

**THE CULTURAL LANDSCAPE OF NORTHCOAST LUMBER COMMUNITIES**

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## **ABSTRACT**

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Cultural landscapes are a recognized type of historical resource and also an interdisciplinary category of analysis that can help to illuminate the relationship of people to their environments- how people interpret space. Cultural landscapes reflect the values and conflicts of society as well as the physical results of changing practices and attitudes toward the environment that we inhabit. This paper is an introduction to academic research on the concept of cultural landscapes, and will demonstrate the application of this method of analysis in case studies of three cultural landscapes of worker communities in the lumber industry. Studies such as these can provide additional insights into the relationships between immigrants and citizens, labor and management, gender roles and gendered occupations, “marginal” and “productive” lands, cultural identities and Western and non-Western cultural perspectives.

The goal of federal laws, practices and policies for the documentation, interpretation and preservation of historical resources is to create a sense of history and national identity. Federal and state guidelines for the assessment of historical significance are based on the long established practice of memorializing people, places and events, and fine architectural and engineering design. This approach privileges a

view of history which is based on Western culture, and a dominant narrative of American history with its roots in the 19th Century. This perspective is further framed into local programs to document cultural resources, and have typically focused on individual examples of the built environment.

The cultural landscape of the Northcoast region can illustrate the often conflicting cultural attitudes, values and perceptions of space and place, and the political processes that have shaped the landscapes of settlement and industry. Among the men and women who arrived here were large numbers of immigrants whose stories have largely been bypassed in local histories. The histories of Indigenous peoples and their cultural resources are popularly considered as part of pre-contact history. This study of cultural landscapes highlights a few of these undocumented stories in order to provide a more complex analysis and illustrates how different concepts of place and space, history, culture and political processes have shaped the landscapes of settlement.

## TABLE OF CONTENTS

ABSTRACT.....	ii
TABLE OF CONTENTS.....	iv
LIST OF TABLES.....	vi
LIST OF FIGURES.....	vii
CHAPTER I: INTRODUCTION.....	1
CHAPTER II: REVIEW OF LITERATURE & HISTORICAL CONTEXTS.....	9
Concepts and Definitions.....	10
Cultural Landscapes as Historical Resources .....	14
Historic Preservation in the United States.....	16
Evaluating Properties as Historical Resources .....	21
Layering the Cultural Landscapes of the Humboldt Bay Region.....	23
The Indigenous Cultural Landscape.....	25
Landscape & Economy of Settler Colonialism .....	27
Worker Housing .....	33
The Company Town.....	36
Labor, Housing, & Company Towns.....	42
CHAPTER III METHODOLOGY & CASE STUDIES.....	44
Case Study research .....	44
Case Study 1: Samoa Historic District.....	47
Case Study 2: McGrath Boarding House/Marine Apartments:.....	49
Case Study 3: "Little Italy" Neighborhood .....	50

CHAPTER IV RESULTS.....	52
Case Study 1 Samoa: The Home of Industry.....	56
Case Study 2: McGrath Boarding House & Tidewater Lumbering.....	87
case study 3: “Little Italy” Neighborhood & Marginal Lands.....	103
CHAPTER V: CONCLUSION.....	117
BIBLIOGRAPHY.....	130
APPENDIX A: Preservation Brief 36: Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes.....	145
APPENDIX B: California Environmental Quality Act (CEQA) and Historical Resources, Technical Assistance Series 1.....	166
APPENDIX C: Belcher Atlas of HumboldtCounty, California, North bay section.....	229

## LIST OF TABLES

Table 1: An Examination of Cultural Landscape through Cultural Resources Evaluation of Samoa Company Town, McGrath Boarding House and the “Little Italy” Neighborhood .....	53
Table 2: An Examination of the Samoa Company Town as an Example of a Planned Industrial Community and Designed Landscape .....	80
Table 3: An Examination of the McGrath Boarding House as an Example of a Vernacular Landscape.....	114
Table 4: An Examination of “Little Italy” Neighborhood as a Vernacular Landscape.....	113

## LIST OF FIGURES

Figure 1: Location map of Samoa Historic District.....	82
Figure 2: Residential properties, Samoa Company Town.....	83
Figure 3: Worker Cottage, Vance Redwood Lumber Co. (1903) .....	84
Figure 4: Portable buildings, Hammond Lumber Company, (1910).....	85
Figure 5: Aerial view of Hammond Lumber Company and Samoa (1946).....	86
Figure 6: Location map of McGrath Boarding House (1886).....	100
Figure 7: Aerial photo of McGrath Boarding House (1946) .....	101
Figure 8: McGrath Boarding House/Marine Apartments (2013).....	102
Figure 9: Map of Granite Avenue Italian immigrant neighborhood (1945).....	114
Figure 10: Aerial photo of Granite Avenue and 24 <sup>th</sup> Street (1951).....	115

## CHAPTER I: INTRODUCTION

This paper is an introduction to academic research on the concept of cultural landscapes, focusing on the cultural landscapes of worker communities in the lumber industry on the Northcoast of California. Cultural landscapes are an interdisciplinary category of analysis that helps to illuminate the relationship of people to their environments- how we interpret space. They provide insights into the economic, social and political relationships of one group to another, as well as one cultural perspective to another. Cultural landscapes reflect the values and conflicts of society as well as the physical results of changing practices.

Our perception of the value of any landscape is framed by our cultural values. They are dynamic, and therefore may be altered if we decide that they are no longer functional. Residents of the Northcoast inhabit a layered landscape created by the diverse peoples and cultures that have lived here. This landscape continues to shape the lives of the residents, their homes, their occupations, and their cultural practices. Therefore, this study is based on the assumption that insight into the cultural practices of diverse groups can be attained through the study of cultural landscapes.

In the last two decades there has been a renewed interest in cultural diversity in historic preservation, not just in diversifying the professionals involved in the field but also diversifying the types of resources, as well as the definition of historical resources (Lee 2014). This change was due in part to the influence of the New West history, which

introduced a multicultural interpretation of the West and encouraged a reexamination of the Turner thesis to place western founding myths in context (Limerick 1987).

The National Park Service, the federal agency responsible for historic preservation programs, has encouraged State Historic Preservation offices to examine potential historical resources in a broader context, to consider how class, race, cultures and social values are reflected in our use of physical space (Lee 2012). As a result, surveys and studies were conducted in the United States that used a new category of analysis and documented a new property type, the cultural landscape. In California, the first broad study of ethnic community history was conducted and published by California State Office of Historic Preservation as *Five Views: An Ethnic Historic Site Survey for California*. Included in this volume were a diverse group of cultural landscapes, including the Yurok village of Re-Kwoi (Requa), the African-American settlement of Allensworth, the Chinese immigrant villages of China Camp and Locke, the Japanese Manzanar War Relocation Center and Tule Lake Relocation Camp, and Chicano Park (Office of Historic Preservation, California Department of Parks and Recreation 1988).

I was first introduced to the concept of cultural landscapes when I served as a State Historian at the California State Office of Historic Preservation. Working at the state level one becomes aware that historic preservation is constructed within a framework of codes and regulations, which are embedded in cultural perspectives and assumptions. While historic preservation programs are based on state and federal codes and regulations, in compliance with the California Environmental Quality Act, the

documentation of historical resources is primarily conducted at the local level (California Office of Historic Preservation 2001). This approach can be problematic for the study and documentation of historical resources in that local land use issues, the availability of technical support staff, and economic development priorities, as well as local prejudices favoring or disallowing certain types of resources, all factor into local decisions to recognize properties as historically significant. The histories of ordinary people and those who have been marginalized, not based on standard American historical figures and events, often receive little attention. These are the empty spaces on the historical timeline that are difficult to document and which this study will examine.

Landscape use and change reflect the beliefs and perceptions of different human groups who belong to a particular place or community. These communities are comprised of ordinary people living ordinary lives who also have made contributions to history. Landscape thus contributes to an individual's identity, which is often defined in opposition to other social groups. For example, different styles of farm houses and barns denote the different identities of ethnic immigrants; the desert or plains combine with idyllic farm scenes to produce a "Southwest" or "Midwest" identity.

In other words, landscape defines normative understandings of "self" and "other," "insider" and "outsider," for various social categories and the human beings who dwell within those categories. The purpose of this thesis was to test the assumption that cultural landscapes are an important tool with which to examine contested spaces and to document the people and institutions that have constructed them.

Chapter II will review the literature on cultural landscapes, including how they are framed within federal programs for historical resources. I will provide a contextual overview of the history of the region and a discussion of, worker communities, labor and housing as a basis for the case study analyses. I will present the concept of the cultural landscape as a historical resource and as a category of analysis which I will apply to selected examples of cultural landscapes characteristic of the lumbering communities of the Northcoast. While these spaces may have been created with a specific intent, they have been reinterpreted and reworked for other purposes by the people who live or work there.

In the context of worker communities, places such as company towns are managed spaces designed to control and shape worker behavior. Workers had to weigh company incentives such as housing and benefits to their families against the ability with whom they may associate, organize, or support. Those who are not allowed to live in the company town or to be employed there had to find other spaces to live or different ways to make a living. Sometimes the spaces available to them were in places considered marginal, in a less desirable location, or in jobs with less status. These marginal areas, outside the purview of those in power, may have allowed for alternate constructions of personal space.

This thesis uses the lens of cultural landscape to illustrate the relationship between labor and management in the development of three types of worker housing that typically existed in Northcoast lumber communities. Humans interpret and assign meaning to the

spaces they inhabit. In the case of the company town, managing labor is facilitated by manipulating the worksite, the home and in the community and the values assigned to them. Labor constantly negotiates, accommodates, resists and modifies these spaces, so the way we use the spaces created by management are never exactly as originally planned. Underlying the creation of these forms are also the societal values implanted in the settler colonial system which occupied the territory, erased the previous inhabitants and their interpretation of the landscape, as well as assigning different values to various aspects of the landscape along with the inhabitants.

This thesis employs a comparative case study approach, as I explain in Chapter III Methodology. Case studies, in general, study one person, one event or a phenomenon in depth. The phenomena under study in this thesis are the spaces of home as interpreted in the cultural landscape. Three case studies represent the diversity of these spaces in Northcoast lumbering communities. The three cultural landscape case studies associated with the lumber industry are broadly typical of the Northcoast and illustrates concepts of home and community that were shaped to a particular purpose. They are also representative of a particular period in local history as introduced in the historical contexts in Chapter II.

Chapter IV will present the results of my analyses. The company town of Samoa created a home for workers, defined by the Hammond Lumber Company. The origin of the company town of Samoa is a reflection of Progressive Era concepts of scientific management and a pragmatic approach to managing labor. Both the McGrath Boarding

House and the Dal Porto House present spaces of home created by workers. These homes were consigned to “marginal” spaces, lands not considered otherwise valuable property. In the case of the McGrath Boarding House, a young widow with children converted her home on the industrial border between the first residential area and the industrial waterfront of Eureka into a boarding house. This land was largely industrial and over time the first residents moved to new residential areas far from the waterfront. Italian immigrants, sometimes in accommodation to existing conditions and resources and in resistance to ethnic bias, created an ethnic neighborhood for extended family on cutover land near Arcata. The land had been logged before was sold for inexpensive house sites and was commonly referred to as “Stump Town”

Gaps in labor history are highlighted in this chapter, focusing on the lumber industry’s manipulation of concepts of home and contested personal spaces. Race, ethnicity and gender divisions were used as tools by management to reinforce the management perception of home in the company town. Alternate spaces of home were created on marginal lands in the waterfront boarding house while immigrants maintained their family and cultural ties by recreating the familiar landscape of the home country.

In Chapter V, I review the barriers and potential opportunities for further research. These places are documented as historical resources under programs that were created originally to recognize buildings and structures of architectural merit, memorials and monuments. Landscapes are dynamic, so change is inherent and cultural landscapes may

challenge the commonly accepted criteria of significance and integrity that are applied to other historical resources.

Our cultural biases are embedded in the standards and practices we use for documenting historical resources and may complicate or present an obstacle to documentation of cultural landscapes. There are many other landscapes that have not been documented; marginal lands and satellite communities provide alternative spaces of home, work, cultural and recreational activities. Framed within current local, state and federal land use codes and regulations, every project is conducted within a political context. The culturally biased perspectives on which these laws were created make it difficult to shape an equitable system to recognize our shared history (California State Office of Historic Preservation 2014a; California State Office of Historic Preservation 2014b).

This thesis is based on extensive archival research conducted over several years and draws upon local repositories, particularly the extensive archives found in the Humboldt Room, and Special Collections Humboldt State University Library. Other materials relevant to this subject were found in the Bancroft Library and at the Forest History Society at Duke University. The case study is based on historical resources reports prepared according to guidelines established by the California Environmental Quality Act (CEQA), and for which I was a primary or sole consultant. It is also informed by my work for the last twenty years both as a public history consultant in the field of historic preservation and as an archives consultant focusing on community

archives. The Case Studies included in this paper provide an introduction to some of the characteristic cultural landscapes of this region and to the concept of cultural landscapes as a tool of analysis that can help us to understand the relationships between peoples, cultures and the environment.

## CHAPTER II: REVIEW OF LITERATURE & HISTORICAL CONTEXTS

To ask if such-and-such a place is a “cultural landscape” is absurd and perhaps delusion; the need to ask is an unfortunate necessity among the members of a (settler ) culture whom would sooner imagine that their/our culture has not been imposed on the multitude of landscapes (of other people) we depend on for our survival. A more practical question for theory is *how many* cultural landscapes can be seen in such-and-such a place (O’Flaherty 2010, 8).

In this chapter I explain the origins of the term “Cultural Landscape”, how it has been applied to historical resources and how the commonly accepted definitions under which a cultural landscape is analyzed are codified in state and federal guidelines for historic preservation. I will explain the process under which properties may be evaluated as historical resources in California under CEQA, the most frequent of study of potential historical resources undertaken in this region. I will then provide a general introduction to the cultural landscapes of the Humboldt Bay Region, from the Indigenous landscape through the settler colonial period. I also review the literature on company owned or dominated towns and labor history focusing on the lumber industry and their management of the physical space of community and the places of home. Alternate spaces might be created on lands considered “marginal” and therefore deemed of little value.

## CONCEPTS AND DEFINITIONS

Western thought about cultural landscapes is rooted in the pastoral views of agricultural landscapes found in art, particularly in the 16<sup>th</sup> and 17<sup>th</sup> centuries when industrialization was first starting to change the landscape of Europe. (Birnbaum 1994). The landscape was bounded by what we could view and composed of the elements we found there. Our understanding of a cultural landscape shifts as our physical position shifts so, while there may be only one landscape, there may be many interpretations of the land co-existing at one time.

German geographer Otto Schluter first used the term cultural landscape as an academic term in 1908, to define geography as a landscape science. He defined only two types of landscapes, original landscape or the landscape that existed before major human related changes and the cultural landscape or a landscape created by human culture (Fowler 2003). Carl O. Sauer stressed the agency of culture as a force shaping the visible features of the environment. His paper "The Morphology of Landscape" was probably the most influential in developing ideas on cultural landscapes (Sauer 1925; Fowler 2003)

The cultural landscape is fashioned from a natural landscape by a cultural group. Culture is the agent, the natural area is the medium, the cultural landscape is the result (Longstreth 2008,24).

This is the definition by which most cultural landscapes have been identified, assessed, managed and listed as cultural and historical resources. The cultural landscape is viewed as the physical medium within which cultures interact. In 1992 the World

Heritage Committee included cultural landscapes as one of the categories in the identification of World Heritage Sites (Fowler 2003).

As geographer P.J. Fowler expressed in his own report to the Commission, by recognizing cultural landscapes, “we have, almost for the first time, given ourselves the opportunity to recognize places that may well look ordinary but that can fill out in our appreciation to become extraordinary...” (Fowler 2003, 18). In this way heritage preservation programs may construct narratives that shape our view of the past by legitimizing landscapes that may reinforce certain views of the past and omit others.

The ordinary or vernacular landscape was the primary interest of John Brinkerhoff Jackson, an interdisciplinary scholar whose major writings include his magazine *Landscape*. In these writings he explains that his goal to interpret the contemporary American landscape as a fulfillment of changes which began two centuries ago, in the process he influenced a whole generation of geographers (Jackson 1984). Many of these scholars contributed essays to another important work on vernacular cultural landscapes, *The Interpretation of Ordinary Landscapes, Geographical Essays*. Among these was Yi-Fun Tuan, who described the difference between Human Geography and Humanistic Geography in that the latter also focuses on the sense of place and the individual’s interpretation of place. He expanded on this concept in his books, *Space and Place: The Perspective of Experience* and *Topophilia: a study of environmental perception, attitudes, and values*. He has explained the difference in this way:

Human geography studies human relationships. Human geography's optimism lies in its belief that asymmetrical relationships and exploitation can be removed, or reversed. What human geography does not consider, and what humanistic geography does, is the role [relationships] play in nearly all human contacts and exchanges (“Yi-Fu Tuan - Wikipedia, the Free Encyclopedia” 2014, 1 ).

Tuan’s perspective on the study of place and space echoed that of Philosopher Henri Lefebvre. In his book, *The Production of Space*, Lefebvre argued that space is a social product, or a complex social construction based on values, in which we produce meanings. Space is more than a process, which may reflect power relationships, space and spatial relations yield insights into unacknowledged biases, prejudices and inequalities that may go unexamined. Lefebvre distinguished between three different types of spaces. The first is social-spatial practices and perceptions (le perçu). Representations or theories of space (le conçu) are the formal portrayals of engineers, architects, etc. The spaces of representation (le vécu) are the physical spaces where everyday life is lived (Dinius, and Vergara 2011).

Labor geographer Andrew Herod, focusing on the relationship between spatial engineering and social engineering, argues that the physicality of landscapes reflects the social interests of those who construct them, and that the production of the landscape shapes the way in which social relationships unfold. Capital may create a workspace or a company town, but it may be recreated, reinterpreted, or repurposed by labor. In the company town workers accept limited control of physical space, homes that could never

be purchased, and rules for behavior in exchange for low rent and amenities such as schools and recreational activities (Dinius, and Vergara 2011).

Michel Foucault introduced the concept of “governmentality,” which encourages us to think of power not only in terms of the hierarchical power of the state, but also in spaces of discipline and control, or of knowledge such as practices of mapping. According to Foucault, governmentality involves the examination of practices and programs to shape, guide and govern the behaviors of others and the self, and also in knowing and directing the qualities of a population. In these terms, management is a form of governance and the management of spaces, men and objects is then a form of governmentality (Dinius, and Vergara 2011). From this perspective a company town is an integrated component of a production system designed to meet the needs of industry at a particular time. It managed spaces of work and home, established codes of conduct, provided incentives such as schools and housing, and ensured compliance by enlisting workers and neighbors to reinforce rules. (Crampton and Elden 2007)

As part of an industrial system, spaces may also be discarded if no longer needed (Dinius, and Vergara 2011). Thus the company towns of Scotia and Samoa were eventually converted into real estate when they were no longer useful. This did not prevent the residents of the town from investing them with more personal significance. Displaced tenant workers considered the town their home. Although homes were still available as rental housing, the camaraderie and social capital of co-workers, and generations of the same family, living and working in the same place was gone.

## CULTURAL LANDSCAPES AS HISTORICAL RESOURCES

Cultural landscapes are a natural and human produced physical environment and ideas projected onto the land. Landscapes are dynamic and change is inherent so they challenge the accepted criteria of significance and integrity, which are embedded in the processes we use to document, preserve, and interpret historical resources.

The National Park Service added cultural landscapes as a category of historical resources in the National Register in 1988, and published a set of guidelines for defining, identifying, evaluating and treatment in 1994. This step represented a new understanding that buildings can best be understood as parts of a place or community, the way that we invest it with meaning, according to specific sets of values and ideals, is as important as the physical components. It was a major shift in our attempts to identify historical resources.

Landscape and setting had previously been only one aspect in the description of a property. It was not uncommon to at that time to find landscape descriptions reduced to a few words and the measurements of the lot or just the footprint of the building (Longstreth 2008; Sprinkle Jr. 2014; Greider and Garkovich 1994). All documented historical resources are framed by federal and state definitions, guidelines and procedures (Page, Gilbert, and Dolan 1998). The National Register program defines these cultural landscapes as "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person

or exhibiting other cultural or aesthetic values" (How to Apply the National Register Criteria for Evaluation, National Register of Historic Places 1990).

The National Park Service has outlined an interdisciplinary process for conducting cultural landscape studies within their agency that has in turn influenced the documentation of historical resources. *The Guide To Cultural Landscape Reports: Contents, Process, and Techniques* outlines a process that includes the analysis of place, the natural and human produced physical environment, and of process, or the creative act of shaping a place according to underlying values and ideals. This was one of the first attempts to integrate the study of natural and cultural resources evidenced in a cultural landscape, and can be a useful tool with which to gain insights on economic, social and political relationships (Page, Gilbert, and Dolan 1998).

The International Council on Monuments and Sites (ICOMOS), which evaluates and designates World Heritage Sites, in 1992 included cultural landscapes in order to further its goal of "focusing on the interaction of people and nature over time," (ICOMOS 2004,1) and described cultural landscapes as the nexus of biodiversity and cultural diversity. In 2004, the *Natchitoches Declaration on Heritage Landscapes* was adopted at an ICOMOS symposium in Louisiana,

There is a convergence of natural and cultural values in the landscape, and a growing recognition that the traditional separation of nature and culture is a hindrance to protection, and is no longer sustainable. Further, heritage landscape protection is required at the local, national and global levels in order to transmit these universally valuable

heritage resources to future generations. (ICOMOS 2004, 1)

## **HISTORIC PRESERVATION IN THE UNITED STATES**

Historic preservation programs in the United States were originally created in order to recognize buildings and structures of architectural merit, national memorials and historic monuments. The guidelines and procedures under which all historical resources have been evaluated still focus on the documentation of buildings of architectural merit, nationally significant Americans and sites of important events.

Towards the end of the 19th century, as the United States was rebuilding after the Civil War, the country was ready to embrace a sense of national identity and history. At that time, attempts to preserve and maintain historic sites were still largely limited to private citizens or local organizations and for more than a century, the focus had been on national monuments. The first efforts were in 1813, to preserve Independence Hall, and in 1856 the formation of Mt. Vernon Ladies Association of the Union to preserve Washington's home. There was also increased interest in the new field of anthropology with studies focusing on the disappearing "traditional" Native American communities in the western states (Sprinkle Jr. 2014).

At that time the government began to enact legislation for the preservation of sites and objects deemed significant to the nation's history. In 1872, an Act of Congress established the first National Park, Yellowstone. In 1890 Chickamauga and Chattanooga Battlefields were protected (25 Stat. 961; 16 USC 431) as public-memorials. In 1906, the

Antiquities Act enabled the President to declare landmarks or objects as a national monument. This Act (PL 59-209; 34 Stat. 225; 16 USC 431-433) provided for protection of historic, prehistoric, and scientific features on federal lands, authorized the President to proclaim national monuments, and permitted scientific investigation of antiquities on federal lands under federal regulations (Sprinkle Jr. 2014).

Congress had retained the power to create national parks and could recognize historical monuments. This had placed the acquisition and preservation of significant sites into a political framework, with decisions subject to political influence. The Roosevelt administration was encouraged by conservation groups, historical societies, as well as scientists to set up a program with evaluative criteria, administered by professionals in those fields. The 1916 National Park Service Organic Act 1916 created the National Park Service (NPS) within the U.S. Department of the Interior with a dual mandate to promote and to regulate the use of the national parks in order to preserve and protect the resources for the public (PL 64-235; 39 Stat 535; 16 USC 1; Sprinkle Jr. 2014).

Historic preservation, as we understand it today, was created with the passage of the 1935 Historic Sites Act of 1935 (PL 74-292; 49 Stat. 666; 16 USC 461-467). This declared "a national policy to preserve for public use historic sites, buildings, and objects . . ." (Sprinkle Jr. 2014 ,11) and authorized the programs known as the Historic American Buildings Survey, the Historic American Engineering Record, and the National Historic Landmarks Survey. Under this new law, the NPS was given the authority to restore,

reconstruct, rehabilitate, preserve, and maintain historical or prehistoric sites, buildings, objects, and properties of national historical or archaeological significance as well as to establish and maintain museums (Sprinkle Jr. 2014).

At that time, it had become apparent to local patriotic groups and historical societies that they did not have the ability to maintain all of the resources they had acquired, and Congress was pressing the federal government to take ownership. Local preservationists feared that communities were changing quickly with the construction of new highways, widening of streets and demolition of properties such that the government needed to step in. Another factor was the economic and social instability of the Great Depression, with a need to stimulate the economy as well as to infuse the public with “a spirit of patriotism and devotion to our form of government” (Sprinkle Jr. 2014, 10).

The next major development in historic preservation policy came during a similar period of major social change. In 1966, Congress passed the National Historic Preservation Act (NHPA), a significant legislation for the preservation movement, which created the National Register of Historic Places, the National Historic Landmarks program and established State Historic Preservation Offices. The nation was once again experiencing social unrest and as it , approached the bicentennial of the nation, it was re-examining the founding myths and histories. At that time, the NHPA was considered the most far-reaching preservation legislation ever enacted in the United States.

Several other pieces of legislation were passed at that time that would be linked to the NHPA. Of these, the National Environmental Policy Act of 1969 would be the most significant by recognizing impacts on historical resources as impacts on the environment. Federal funding programs for transportation, housing and infrastructure projects would be linked to historic preservation by requiring review and documentation of historical resources and assessment of potential impacts in order to obtain federal assistance (Sprinkle Jr. 2014).

The Department of the Interior, National Park Service (NPS) is the umbrella agency for federal and state cultural resource management in the United States. The NPS standards and guidelines for the identification, documentation and treatment of historical resources are universally accepted as the appropriate tools for evaluating potential historical resources. Every cultural resource is assessed for historical significance in the National Register Program against a historic context. Historic contexts have generally emphasized nationally significant people, places, events and structures. Although state and local preservation programs allow for contexts that recognize state, local and regional significance, these national contexts have been largely incorporated intact into local historic property registration programs.

The first NPS thematic framework, adopted in 1936, was conceived in terms of the "stages of American progress" and focused mainly on the achievements of military and political figures. Revisions in 1970 and 1987 provided more chronological detail and expanded the number of historical themes although the basic conception of the past as a

movement toward progress remained the same. The current thematic framework was developed by the National Park Service in 1993 and spans prehistory to the modern period with broader themes that are designed, for the first time, to reflect the diversity of the peoples of the United States (Park History Program, National Park Service 1993).

Cultural landscapes are categorized as historic districts, a collection of buildings, sites, structures, objects and landscapes that relate to a shared historic context. The National Park Service, in *Preservation Brief 39: Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes*, outlines a strategy for dealing with cultural landscapes. It recognizes two types of cultural landscapes the Historic Designed Landscape and the Vernacular Landscapes. The Historic Designed Landscape was consciously designed or laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or an amateur gardener working in a recognized style or tradition, such as parks, campuses, and estates. This type is more compatible with the existing guidelines and criteria for historical resources, which are based on buildings and structures based on a particular architectural style or designer (Birnbaum 1994).

The Historic Vernacular Landscape is a resource that evolved through use by the people, whose activities or occupancy shaped that landscape. It reflects the physical, biological, and cultural character of those everyday lives. Examples include rural villages, industrial complexes of all types, a single farm or large agricultural landscapes.

This is the category into which the ordinary landscapes, ethnic communities and cultural sites, are fitted (Birnbaum 1994).

Two sub-categories were created for landscapes, which are a carryover of the earlier emphasis on historic monuments and antiquities. These are 1) the Historic Site, a landscape significant for its association with a historic event, activity, or person such as battlefields and a president's house; and 2) the Ethnographic Landscape, a landscape containing a variety of natural and cultural resources that associated people define as heritage resources and may include settlements, religious sacred sites, geological structures, flora and fauna, and subsistence and ceremonial grounds. In practice, many preservation professionals find the documentation thresholds for Ethnographic Landscape difficult to navigate and this category is used most frequently for Native American archaeological sites (Birnbaum 1994).

## **EVALUATING PROPERTIES AS HISTORICAL RESOURCES**

In order to evaluate a historic resource under CEQA, it is necessary to determine if it is listed, or eligible for listing, in the California Register of Historical Resources. The National Register Criteria for Evaluation are the federal standard for assessing whether a property is historically significant and have been incorporated into the California Register and CEQA in order to assure consistency (California Office of Historic Preservation 2005). Usually referred to as the NR Criteria, they provide a guide for the analysis of a property's age, integrity, and significance and establish the basis for

assessing impacts. The California Register recognizes properties that meet at least one of the following eligibility criteria, which parallel those of the National Register:

Criterion A: 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

Criterion B: It is associated with the lives of persons important to local, California, or national history; or

Criterion C: 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; or

Criterion D: It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation. (California Office of Historic Preservation 2005) .

Properties must also possess integrity, as defined in the California Register they must “retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance” (California Office of Historic Preservation, Technical Assistance Series #6, p 67). Properties should be at least 50 years, though properties reaching 45 years may be evaluated. Significance is based on the association with events, activities, or developments that were important in the past; the lives of people who were important in the past; significant architectural history, landscape history, or engineering achievements; or the potential to yield information through archeological investigation about our past (California Office of Historic Preservation 2001f; *How to Apply the National Register Criteria for Evaluation, National Register of Historic Places* 1990; “Determining the Significance of Impacts to Archeological and Historical Resources” 2014).

The Northcoast serves as a perfect environment in which to study cultural landscape. This region exhibits all of the aspects of cultural landscapes described above. This includes designed landscapes and vernacular landscapes, archaeological resources, ethnic communities, landscapes of industry, settlements, ethnographic and sacred sites, subsistence and ceremonial grounds, the spaces of everyday life, and those exhibiting cultural or aesthetic values.

#### LAYERING THE CULTURAL LANDSCAPES OF THE HUMBOLDT BAY REGION

The North coast was colonized during the Gold Rush, as a shipping and supply point for the Northern Mines. Colonization imposes a new order on pre-existing systems; and is accompanied by a redefinition of the occupied environment. Indigenous names that describe the role, function or significance of a place to the original inhabitants are replaced by others that assign a different relative value or commodify some resources as settlers occupy the landscape (Giblett 1996). Australian Anthropologist Patrick Wolfe has described this invasion as a structure and not an event. Settler colonies were designed to displace and replace the indigenous populations rather than exploiting them for their labor (Wolfe 1998)

Geographer Andrew Sluyter proposed that “settler geographers” had continued to perpetuate colonial fusions of knowledge, such that indigenous populations were viewed as part of the landscape rather than interacting, shaping or managing it (Sluyter 2001a; Sluyter 2001b). Countering Frederik Jackson Turner’s agrarian image of the

development of the West, historian Andrew Isenberg explains that colonization was characterized by rapid industrialization, city building and a focus on the redwood lumber industry in the Northcoast region (Isenberg 2005; P. Robbins 2004; W. G. Robbins 1994).

In the 19<sup>th</sup> century, the characteristic natural and indigenous landscapes of the Northcoast were greatly impacted by the Tidewater Lumbering era, which dominated the American colonization of coastal areas in the West such as the Puget Sound and Humboldt Bay. A group of influential immigrants from New Brunswick, who had all been involved in the timber industry, would become the owners and founders of the first mills, shipyards, and lumber companies on the Northcoast. These men all recruited workers, investors, and associates from their homeland, many of them family members, to convert the new lands to the same kind of resource extraction economy based on forestry, fishing and farming (Coy 1929; Wynn 1981).

Although now officially designated as natural resources, U.S. land law and land use policies promoted the development of a “productive” landscape, often allowing destructive manipulation in order to facilitate the optimum economic benefit. The Swamp Land Acts of 1849, 1850 and 1860 were intended to promote settlement and to “reclaim” swamplands for productive use by allowing the sale of these lands as well as identifying “marginal” lands, which were left to others until they could be reclaimed. A major problem with this policy was the very broad definition of swamplands, and included all types of seasonal wetlands as well as tidelands.

Tidelands, the strip of land between ordinary high tide and ordinary low tide, were particularly valued by both native peoples and colonists as the transportation corridor between land and sea and would be among the first places converted to industrial or commercial use by the colonizers. Marginal lands themselves could be contested spaces, the location of camps and shacks for laborers, refuge and subsistence for remaining Indigenous populations. Historically these marginal environments remained on the fringe until they were filled in as the urban area grew, as worker neighborhoods or industrial sites (Giblett 1996; Isenberg 2005; Van Kirk 2001).

## **THE INDIGENOUS CULTURAL LANDSCAPE**

Wiyot contacts with white explorers and fur trappers prior to the California gold rush changed the character of northwestern California forever and led to the decimation and displacement of the Wiyot in the short course of 15 years. From 1850 to 1865, the territory of the Wiyot became the center for the largest concentration of Euro-Americans in California north of San Francisco. This was caused by the use of Humboldt Bay first as a shipping point to the Northern Mines, the establishment of a redwood timber industry shortly thereafter, and the homesteading of the Eel River and Arcata Bottoms (Coy 1929; Eder 1963).

At the time of first contact the Wiyot population was estimated at 1,000 to 3,300, almost exclusively in villages along the protected shores of Humboldt Bay and near the mouths of the Eel and Mad Rivers (Loud 1918). The Wiyot used the ocean very little for

either food or travel. Major settlements were generally located on still water, where redwood dugout canoes could be used around Humboldt Bay. Wiyot material culture was diverse and sophisticated. Wiyot people hunted and gathered a wide variety of plant and animal resources that enabled them to live in fairly settled communities within their territory. Deer, elk, and acorns constituted the more important land based resources, so colonization of resource lands made a significant impact on their survival (City of Eureka: 1997; Department of Water Resources, Northern District: 1976).

Primarily hunter-gatherers, Native populations were pushed out of the tidelands, riversides and prairies where they had harvested their foods and materials, and soon their survival was compromised. Settlers grazed stock on the prairies and also exploited local fish and wildlife for market. Fencing in elk herds and prohibiting fishing on settler-owned lands, only increased the competition for natural resources. The network of trails, which had enabled travel and the redistribution of raw materials and food supplies between Indian communities, were now controlled by merchants and miners (Department of Water Resources: 1976).

Within the local settler population, there was also an element that believed in a policy of extermination. On February 26, 1860, planned and coordinated attacks were launched on Indian villages on the South Spit and on Indian Island, resulting in the deaths of over 100 people, mostly women and children. Within the Wiyot territory around Humboldt Bay, more recent population studies have calculated a total of 3300 people prior to contact. An estimated population of 2,000 in the Van Duzen Basin and South

Fork of the Eel dropped to 100 by 1910. By the winter of 1864-1865, the Indigenous population had been largely removed from most areas of settlement (Coy 1929; Van Kirk 1977).

While Indian Island on Humboldt Bay is the most obvious remaining landscape of this period, underlying our roads and farms are remnants of the larger indigenous landscapes. While many indigenous place names are still known by descendants, and find their way into archaeological studies, these were largely replaced by colonial geographers. Among the least recognized of the remaining cultural landscape elements from this period are the original trails upon which settlers later constructed their roads, such as Fickle Hill Road and the Old Arcata Road, which follows the contour of North Bay and has been identified as an early trail. Many of these connected settlement sites, hunting grounds, and food gathering sites. The “natural” prairies over which many early settlers would remark, and claim immediately for farming, were good examples of indigenous land management for food and fiber. An example of a restored indigenous cultural landscape would be the habitat restoration project at Potawot Village Health Center, located on a remnant of Wiyot territory adjacent to four historic habitation sites an oxbow section of the Mad River channel (Butler 2002; James Roscoe 1996).

## **LANDSCAPE & ECONOMY OF SETTLER COLONIALISM**

The establishment of a land route from the mining district to the coast led to the development of Humboldt Bay as a major supply center. What is now Humboldt County

was part of a much larger area that included the Northern Mining Districts and was called Trinity County.

Many large tracts of land were assembled after the passage of the federal Timber and Stone Act of 1878. Both this act and the Homestead Act allowed individual mine or land owners to acquire up to 160 acres for farming or harvesting timberland. Prior to this time mill operators purchased timber from individuals and leased or purchased small lots (Mengel:1974; Wettenberger 1924). During the Tidelands Era lumber was moved on local waterways to mills on the Bay. Humboldt Bay, though extensive, is not very deep and large ships depended on deep water channels to navigate around local shipping docks. The region is seismically active and these channels are really earthquake faults. Soil deposited from logging operations periodically obstructed navigation. Consequently the earliest mills and docks were situated adjacent to deep channels so that lumber could be loaded directly on ships.

Most settlements within this region were laid out on a rectangular grid pattern, with a central main street, and oriented to major roads or trails. Large lots were divided as families grew, with newer homes and auxiliary structures added each time. For this reason, older family homes and commercial structures, a modest cottage and the home of a prosperous merchant, would be located on adjacent parcels within the same neighborhood. Apartments to accommodate the business owner's family, a meeting hall or rental rooms were often located above a storefront. Urban homesteads of the earlier

era might include a pump house, barns and other outbuildings, orchards, gardens or a horse pasture on a large lot.

Communities grew by “Additions” or development tracts, as large tracts of land were incorporated within its boundaries. Adjoining tracts were laid out by developers even though street alignments might not exactly match. The grid of streets planned on paper had to adapt to the natural curve of hills, streams and marshes, and to contend with the numerous gulches and river crossings by wooden bridges and board walkways. Dykes were created to provide beds for the logging railroads that were laid across the marshes and wetlands, and to provide additional farmland without the labor required to clear forests. Evidence of the early sloughs and waterways are marked on Sanborn maps and often visible in aerial photos of the region. The presence of dykes and levees to contain the marshes indicate the maritime agricultural landscape that is characteristic of the Humboldt Bay area (Shuster 1946; “Western Air Photograph Collection” 1940).

The largest group of colonists to the Humboldt Bay area during what is referred to as the Settlement Period (1850-1885) arrived from the New England area and the Maritime Provinces. The regional economy in that region was based on the exploitation of timber. Loyalists, such as John Vance’s grandfather, had moved their families north to Canada from the American Colonies after the American Revolutionary War. The colony of New Brunswick which had been, until 1784, part of Nova Scotia, was created for the almost 12,000 refugees had arrived. The majority of them were farmers, craftsmen and merchants. A similar landscape of rivers, marshlands, islands, and forests in New

Brunswick had resulted in the development of a logging and fishing economy in the late nineteenth century, while agriculture was seasonal. In 1803, the timber trade and shipbuilding industry began to service the British fleet and the region became the principle British timber colony in North America (Wynn 1981). Using technologies such as oxen logging, the single bitted axe and relying on natural waterways to convey logs to mill and ship, this was the Tidewater Logging Era (Coy 1929; Ericson 1966).

Among the first immigrants to California from this region were men that would shape the lumber industry around Humboldt Bay, including John Vance, James T. Ryan, J.R. Duff, John Dolbeer, Isaac Minor, David R. Jones and William Carson. A.B Hammond, who had made his first fortune in Montana, was originally from New Brunswick. The acquisition of the Vance Lumber Company established a solid base for the transformation of a family owned timber companies into a corporate lumber industry during the early twentieth century (Wettenberger: 1931; Wynn 1981).

Logging, milling, shipbuilding, farming, fishing, packing and freighting, and the attendant commercial enterprises resulted in the establishment of communities that were designed to support various industries, including logging company towns, mill towns and logging camps, farming communities, freighting, fishing and shipbuilding villages. Timber industry settlements constructed during this period on Humboldt Bay were situated on tidelands adjacent to deep water channels. Large wharves housed lumber awaiting shipping, while adjacent log ponds held logs awaiting milling. Waste from the mills, dumped ballast and silt washed down the streams feeding the Bay soon filled in the

channel around the wharves. It was common practice at that time to “reclaim” wetlands considered “unfit for cultivation,” so waterfront mills and business owners had no problems building on this fill. These early communities were typical of the boom and bust development of the Gold Rush era (Coy 1929; Willis 1969).

In 1850, the census had reported around 55 people in Eureka, mostly single males. By 1860, 302 people resided in Bucksport Township, including Fort Humboldt, with 22 women residing at the Fort and 73 in the surrounding area. At that time, Humboldt ranked second in California counties for the production of lumber with four sawmills in operation. All settlements were small at that time, and housing could be inadequate even when available, with many people still living in tents. Even James T. Ryan and James Duff, lumber contractors for the Fort and co-founders of Eureka, had lived aboard their ship for several years. When Mrs. McGrath started her boarding house at the foot of I Street in 1863, many people in Eureka would still be living in temporary quarters (Guerra 2008; Roscoe 2009).

The cultural landscapes in some of the oldest neighborhoods in the Old Town Historic District, the Eddy Tract in Eureka, or downtown Arcata, were sometimes compared to New England but actually have their origins with the immigrant population from New Brunswick. They recreated their local architecture in a new setting, along with a familiar industrial economy. Settlement period (1850-1885) houses in the Humboldt Bay Region are recognizable examples of simple and straightforward Folk or Vernacular forms with the unadorned classic lines of the Greek Revival Style. Two story houses

were typical of New England, but many of the houses constructed locally were no more than one and one half stories. Basements were uncommon, but raised foundations were a practical measure and accommodation to a landscape of wetlands, sloughs and creeks. In older residential areas one can still find board walkways and raised steps bridging the sidewalk or street to the house (Ennals and Holdsworth 1981; Wynn 1981).

The entrance to Humboldt Bay, and the channels which allowed development of wharves, were the primary connection for Humboldt County to the outside world. At the turn of the 20<sup>th</sup> Century, the major mills were located in Eureka-the Dolbeer and Carson Mill at the Foot of L Street, the Occidental Mill and the Excelsior Redwood Company on Gunther (Indian) Island. Mills on the tidelands were landlocked. They dominated the waterfront but were hemmed in due to commercial and residential development on the surrounding streets. The Vance Mill had burned down in 1893 and was reconstructed on a larger site directly across the Bay on the Samoa Peninsula. This would become the site of the company town of Samoa and operations headquarters of the Hammond Lumber Company (Architectural Resources Group 1987; Heald, Guerra, and Cannon 2004; Roscoe 2009; Stanton 1990).

More wetlands were being drained around Humboldt Bay in an effort to create more agricultural lands, and diking to establish railroad beds. The diking of North Bay was generally completed by 1884 and, as the forests nearest the Bay were cut and milled, the land was soon converted to agriculture. The cultural landscape of the Arcata Bottom,

including the dyke system, is a visual reminder of the major transformation of the wetlands which fostered the growth of the dairy industry (Van Kirk 2001).

Transportation within the region and connections to markets elsewhere had become a concern to business and local residents. From the earliest settlements, residents had relied on oceangoing steamers to connect them to San Francisco, since the overland stage was available only during the dry summer months. The lumber industry now maintained its own fleet of ships. Railroads had been introduced into the region in 1884, but only to extend logging operations further inland or to connect with local mills. Remnants of these early rail lines and dykes are still visible on the sloughs and creeks around the Bay. Since they preferred to operate their own railroad lines, lumber companies eventually expanded into common carrier service. Competing rail lines dominated First Street in Eureka, often constructed on fill, as would become evident in 1968, when the City conducted an environmental study of the shoreline as part of a suit to recover the tidelands (Coy: 1929; Eddy: 1893; Willis 1969).

## **WORKER HOUSING**

Although young single males were the main labor force in lumber industry of the Tidewater Lumbering era, these idealized loggers or railroad worker of local legend were often transient and lived in largely temporary camps, bunkhouses, boarding houses and hotels. During the Tidewater Lumbering era logging was seasonal and mills only operated while they had a supply of lumber. Temporary logging camps provided seasonal

housing, often in tents, and wooden structures were largely introduced when railroads made portable structures feasible. Large bunkhouses were constructed in company owned towns, and bunkhouses in field camps were never very large (Heald, Guerra, and Cannon 2004).

Mill owners in town might provide housing for managers but they expected workers to find their own housing. Hotels were largely constructed in the 1870s when a number of mills dominated the Eureka waterfront and mill workers need only cross one or two streets to be at their job. Some of the smaller ones catered to an ethnic clientele and might also accommodate seamen. A large number of boarding houses also operated at this time, generally housing no more than a dozen residents. Loggers arrived every weekend from the camps on the logging railroads to spend the weekend at the nearby restaurants, brothels, saloons and hotels. During this period saloons might be open all day, which caused problems with workers arriving late or drunk on the job (Architectural Resources Group 1987; Buckley 2000; Carlson 2003; Stanton 1990).

Modern industrial markets required a constant and reliable supply of lumber and management soon began to view the man with a dependent family as the ideal laborer. Progressive era industrial lumbering began to use strategies such as low cost housing, schools, and recreational facilities to recruit and retain workers with families. They banned saloons and liquor from company property. Labor shortages had induced them to recruit immigrant workers so they also promoted “Americanization” programs, often targeting their wives, in order to minimize the potential for collective labor organizing

and to build company loyalty. While bunkhouses were still in use they now provided smaller sleeping rooms instead of the large bunk room. Although his company never established a company town, William Carson constructed his own home on the bluff above his mill and constructed several cottages in the neighborhood nearest the mill site for managers and skilled workers (Allen 1982; Crawford 1995).

Immigrant architecture is the architecture of ethnic identity through the built environment and the cultural landscape. This may be expressed by the use of traditional building practices, with new architectural forms evolving from older ones, or the construction of buildings, structures and objects that reflect the culture. (Carter 1995) Although skilled workers were found in every racial and ethnic group, higher status and higher paid jobs were usually reserved for those identified as “Americans” at that time. Both immigrants and many American workers sometimes traded lower cost housing and material comfort for personal space where they could maintain their cultural identity and a degree of autonomy (Cornford 1987; Roediger 1991; Roediger and Esch 2012). In many of the small towns around Humboldt Bay, they would create worker neighborhoods with fraternal lodges, churches, grocers and small businesses. The Dal Porto House, in Case Study 3 , anchored a neighborhood on the outskirts of Arcata with homes owned by the same extended family over several generations in an area known as “Little Italy.

## THE COMPANY TOWN

The general definition of a "company town," is a community designed and operated for workers by a company owner or sponsor (Crawford 1991; Wright 1981). While we are accustomed to think of these as remote or planned communities, what matters most are the power relations between industry and the working class. The recent book *Company Towns in the Americas, Landscape Power and Working-Class Communities*, illustrates the use of the company town as a tool in the spread of transnational industrial capitalism (Dinius, and Vergara 2011). As such they are useful in understanding settler colonialism and the creation of the industrial landscape of the American West.

The earliest company towns were created in Europe and imported in various forms to the United States during the 18th century industrial revolution, of which the mill villages of New England were probably the best known examples. Not simply housing facilities, these worker communities allowed the employer to maintain control of the workers' time on the job and at leisure, spaces where Christian stewardship translated into moral supervision. While we may be more familiar with the lumber industry dominated communities in this region, examples have been documented in many other industries, including mining, textile mills, railroads and agriculture each with a different mix of gendered roles, a class structure and racialized spaces of work and home. This includes studies such as *Like a Family, The Making of a Southern Cotton Mill World, The House That Lemons Built : Race, Ethnicity, Gender, Citizenship and The Creation of a*

*Citrus Empire, 1893-1919*, as well as *The Road to Ludlow: Work, Environment, and Industrialization, 1870-1915*, (Alanen 1979; Allen 1982; Andrews 2003; Hall et al. 1987; McBane 2001; Pope 1942).

Landscapes of labor may not be confined to one site. Architectural Historian Michael James Buckley makes the point in his dissertation that the cultural landscape of the redwood lumbering industry was regional, with worker communities centered on production in Humboldt County and marketing and shipping in the San Francisco Bay Area. Mic(Buckley 2000). Historian Don Mitchell, in his book *The Lie of the Land: Migrant Workers and the California Landscape*, explains that the Central Valley is an agricultural landscape that is experienced very differently by the workers who have shaped it (Mitchell 1996).

Scholar and cleric Carlton Pope produced one of the first social histories of worker communities with *Millhands & Preachers: A Study of Gastonia in 1942*. Pope studied the actual role played by the church in the textile industrial community of Gastonia, North Carolina and. provided a critique of the paternalistic relationship between the operators of the textile mills and the churches. More recent studies of workers in the lumber industry in the United States have begun to examine the commonalities of experience between worker communities in different regions and different ethnic groups. This includes path breaking books such as *The Tribe of Black Ulysses: African American Lumber Workers in the Jim Crow South*. The similarities between the experiences of lumber workers in other regions of the United States with

western lumber workers should not be surprising. Many of the forest resource industries in the developing West were supported by investors from the Great Lakes Region, the South, as well as New England and the Maritime Provinces looking for new opportunities as lumbering declined in those regions. In some cases they purchased mills and land and then imported management practices and laborers from their existing operations (Gordon 2014; Hall et al. 1987; Isenberg 2005; Mann 2002; Roediger 1991; Roediger and Esch 2012).

Worker housing on both sides of the Atlantic became notorious in the 19<sup>th</sup> Century for its unhealthy environment and dispiriting monotony. Social reformers during this later period attacked the ills of the new industrial city and in particular industrial housing, which was considered to be a factor in labor unrest and the demoralization of the worker. At the turn of the century, with the influx of immigrants and non-English speaking workers, companies also discovered new barriers due to language and cultural differences. The challenge would be to reshape disparate groups of workers into the dependable labor force necessary for the success of their industries.

The period from 1900 to 1930 saw the development of a new model of the company town that incorporated the new approach to city planning with a more complex set of management programs for a diverse group of workers. This new approach was created by the “industrial betterment movement,” and popularly known by the terms social welfare or industrial welfare (Crawford 1995). Planners began to consider how the design and placement of buildings could shape social behavior. Factories, houses and

community facilities were clearly defined and carefully stratified and established the worker's routines.. Not only could the disposition of buildings and grounds, but factory layouts could also have an effect upon the productivity of the enterprise and efficiency of the work force. For this reason, most company towns constructed at this time were designed in whole or in part by professional architects or engineers (Buckley 2000; Garner 1984).

In the mid-1920s, roughly 80 percent of the nation's largest companies practiced some form of what was by then described as "welfare work," designed to prevent labor problems such as strikes and the formation of trade unions and to create incentives for retaining skilled workers. Most of these studies of industrial welfare programs examine urban industrial workers. Margo McBane's study of the Limoneira Company, the largest lemon ranch in the United States by the 1910s, was the first to apply the professionally planned model of urban industrial betterment, or what McBane calls corporate paternalism, to the isolated rural industrial setting of agriculture (McBane 2001). Similarly the isolation of logging camps, such as Falk, or the Pacific Lumber Company in Scotia, was conducive to systems for social control under a benevolent paternalism that cast the company in the role of caretaker or protector of the worker (Buckley 2000; Cornford 1987; Roman 1993).

These new concepts of management and labor relations were planned and administered by trained professionals, though they might enlist churches, social betterment organizations, and women's' groups as allies. Explicitly created to minimize

the two major problems identified by management, unionization and labor turnover, these towns were focused on improving industrial relations by providing workers with significantly better working and living conditions. As increases in productivity became tied to operating efficiency, company towns were restructured to attract and retain the ideal industrial worker-the working man with a family (Crawford 1995).

The housing design reinforced the nuclear family unit and limited the possibility of boarders or extended families. This was employee housing, so those who retired, became unemployed, or were not accepted as tenants found housing elsewhere. One alternative for those unable to reside in company housing, would be to create alternate domestic space in what was typically considered marginal land outside of the company town. Despite the fact that these spaces were usually within an industrial landscape, they afforded a greater degree of flexibility in the use of personal space and offered individuals some control through property ownership. Larger communities have sometimes been termed “satellite settlements” because their economy depended on the primary settlement. In the local lumber industry this could apply to communities such as Manila or Rio Dell (Goddard 1999).

Progressive Era industrial hygiene programs provided recreation and social activities in community spaces as incentives to build family loyalty and to create a sense of shared identity. They also developed programs focused on the role of wife and mother as an agent to reinforce social values preferred by management. Programs for women, such as child care classes, mothers’ clubs and domestic science courses, instructed them

in middle class values, habits, and aspirations, and aided in assimilating immigrant workers. Women were considered the conduit to their husbands, encouraging them to remain gainfully employed and helping to raise the moral character of the family.

The town of Samoa is representative of the common heritage of the North Coast, and of the type of lumbering community developed by people of diverse backgrounds. Memoirs and reminiscences by former workers and their families should also be incorporated into our interpretation of that history (Dearing 1990; McCormick 1984; McCormick 1989; McCormick 1992; Price 1987). Until the last decade historical documentation of the lumber industry communities across the United States has focused on the industry itself, the founders, corporate histories, and technology. The first studies of labor struggles, which were done in the 1980s, have been bolstered by more recent studies that document the role of ethnicity, race, class and gender in the organizing of labor unions and the establishment of class and status in the workplace and in the creation of worker neighborhoods (Cornford 1983; Cornford 1987; Roman 1993).

The design of company housing reinforced the nuclear family unit and company towns typically prohibited boarders, subletting rooms, or rentals to those no longer employed for whatever reason. While co-workers might take up a collection for the family of a worker who died or was injured on the job, and some companies might offer some compensation to the family, remaining in company housing was not an option (Alanen 1979; Heald, Guerra, and Cannon 2004; Carlson 2003). In case of death or injury of the main breadwinner there were no safeguards for workers or their families,

and few options for women with dependent children or a disabled spouse. Operating a boarding house in one's own home or managing residential hotels became an accepted occupation for single women and widows. It also met the need for affordable housing in both urban and in rural settings where no other accommodations were available for skilled workers, ranch foremen, or managers (Jameson and Armitage 1997; Roman 1993; Stanton 1990; Wright 1981).

The lumber industry, through its logging, milling, railroad and shipping operations provided jobs for many immigrants and people of color. A few recent studies have begun to document the social and cultural history of these forest worker communities in more detail. Geoff Mann described the creation of a segregated company town and racialized work in the lumber company town of Weed, California. Many of the African Americans who were recruited to Weed had been working in similar jobs in the pine forests of the South, as William P. Jones describes in his book *The Tribe of Black Ulysses: African American Lumber Workers in the Jim Crow South*. The lumber industry in that region had employed more African American men than any southern economic sector outside of agriculture (Carlson 2003 Jones 2005; Mann 2002 Roman 1993).

### LABOR, HOUSING, & COMPANY TOWNS

Due to its relative geographic isolation Humboldt County had always lacked a pool of surplus labor. The great major of workers during the tidewater lumbering era, prior to the introduction of railroads and steam power, were young single males. Since

wages also tended to be higher in this region than in other parts of California, workers knew that it was not difficult to find another good paying job. In the lumber industry average skills could be acquired within a relatively short period by most untrained workers, many of whom would then move on to a better paying job. During the settlement period, through 1885, it was not uncommon for males of all ages to work seasonally in fishing, farming, or logging in order to support their families or to purchase their own land (Buckley 2000; Cornford 1983; Coy 1929).

Mill workers often lived in boarding houses and hotels near the waterfront mills. Temporary field logging camps provided seasonal housing, often in tents, and wooden structures were largely introduced when railroads made portable structures feasible. Larger base camps would become semi-permanent settlements as the hub of operations within an outlying lumber operation. They could then provide cabins suitable for a small family, a schoolroom, recreation room, and store along with the usual cookhouse and bosses office (Buckley 2000; Conlin 1979; Ericson 1966; Wettenberger 1924).

This new conceptual landscape of the company town was imposed on a place that already had meaning and value to others, though it is beyond the scope of this paper to present that earlier perspective or to document those cultural landscapes. The same landscapes may appear and may be experienced differently by different people, in this case by the workers who live there, and the managers who created and manage it and may or may not also reside there.(Dearing 1990; McCormick 1984; McCormick 1989; McCormick 1992; Price 1987).

## CHAPTER III METHODOLOGY & CASE STUDIES

In order to conduct this case study extensive archival research was conducted in local repositories. One major source was the LP/Hammond Samoa Collection, which includes thousands of original maps, plans, and documents amassed over the last hundred years. Oral history research was incorporated into the historical resources reports as noted and there were no additional interviews conducted for the thesis. The case studies are based on historical resources reports prepared between 2003 and 2012 for local clients under contract, and were subject to peer review and public review based on the lead agency for that project. The framework for these analyses is based on state and federal guidelines for the research, documentation and treatment of historical resources. These guidelines and relevant codes are contained in the Appendix ( California Department of Transportation 2004; O'Donnell 1991; Office of Historic Preservation 1995).

### CASE STUDY RESEARCH

These Case Studies are based on historical resources reports created for the assessment of historical resources under the California Environmental Quality Act (CEQA). CEQA applies a two-part test to determine if a proposed project requires an assessment of impacts on historical resources. First, it must be “historically significant” and secondly, the project would cause “substantial adverse change” to the resource (Bass et al 1999). In order to qualify as “historically significant,” a resource must meet one of

three qualifications: it can be listed in, or eligible for, the California Register or Historical Resources, listed in a local register of historic resources, or it may be identified as important in a cultural resources survey. If none of those thresholds apply, it can be considered significant if the Lead Agency, the one responsible for CEQA review, determines it to be so. Any project that demolishes or alters the physical characteristics of an historical resource that convey its historical significance ( the” character-defining features”) is determined to have materially impaired the resource’s significance (California State Office of Historic Preservation 2002).

The Cultural Resources Analysis or Historic Property Report is designed to assess the historical significance of the property consistent with the requirements of the California Environmental Quality Act. Archaeological sites, buildings, structures, objects and cultural landscapes are all documented on Department of Parks and Recreation (DPR) 523 report forms consistent with the California Environmental Quality Act and in conformance with the Secretary of Interior Standards (California State Office of Historic Preservation 1995).

Preliminary research establishes a context, which includes the identification of periods of significance and geographical, social, economic and physical development themes relating to the study area. Research may be conducted in archival repositories, specialized libraries and government records offices, museums and historical associations, business records, and fraternal or cultural organizations.

Oral history interviews are essential in providing documentation of previously unrecorded properties, the lives of the inhabitants, as well as the various activities that shaped the landscape and built environment. Oral history interviews are framed within a historical context based on an analysis of existing oral histories, archival research, and any previous studies. Photographs, journals or letters contributed by the interviewees that are not already in any repository may be copied and included in the report.

Site inspections are a key component of the analysis and are based on map research as well as any findings in the oral history record. These may include recording building measurements and photographing of building interiors, exteriors, and landscape features, and on site oral history walks and interviews.

A thorough analysis for the purposes of CEQA would also include a definition of the proposed project or activity, description of research methods and resources consulted, a location map and description of the site, the historical context against which it was evaluated, the research bibliography, and DPR 523 forms documenting each building, structure, object, site, or landscape. The assessment of potential impacts and recommended mitigation measures may be conducted separately by a planner rather than cultural resources professional.

The following is a brief outline of the three case studies included in this thesis. Each was selected as meeting the basic criteria for a cultural landscape. Together they

provide a profile of the cultural landscape of worker housing characteristic of the lumber industry on the Northcoast which will be reviewed in Chapter IV Results.

Each of the examples introduces a particular type of housing that was characteristic of the lumber industry on the Northcoast and each is also representative of a particular period in local history. The McGrath Boarding House was established during the Gold Rush and Settlement Period (1850-1885) at the beginning of the Tidewater Lumbering Era. Samoa; was created at the turn of the Twentieth Century when the introduction of industrial lumbering and scientific management resulted in the company town. Arcata's "Little Italy" neighborhood was created during the first half of the twentieth century when the industry was actively recruiting immigrant laborers.

I will also develop a set of tables based on guidelines for the identification and evaluation of cultural landscapes established by the National Register for Historic Places. This includes Table 1, a summary comparison of the three sites, and Tables 2-4 which provide an overview of observations for each property.

### **CASE STUDY 1: SAMOA HISTORIC DISTRICT**

The project proposed for the company town of Samoa was a master plan for development of the site and would incorporate rehabilitation of the existing housing stock, selected demolition of some of the larger service structures, new housing and new recreational facilities. Despite the age of the town and mill site the property had never been evaluated as an historical resource. Preliminary historical research included a search

of property records, photographs, and maps at the County Planning Department, Humboldt County Historical Society, and Humboldt Room at Humboldt State University. The LP Hammond Samoa Collection provided original architectural and engineering plans and site maps. Additional research was conducted in the old company housing office files at Samoa, courtesy of DANCO Builders .The archeological staff conducted a records search for the plan area, the site of the original company town, at the North Coastal Information Center in Klamath, California. For this EIR study, they worked in consultation with Marnie Atkins, Cultural Director for the Table Bluff Wiyot Tribe. Archaeological field methods involved a pedestrian survey of the entire plan area by archaeological and Native American monitors, when sites were mapped and photographed.

A field survey of historical resources was conducted in August and September 2003 by Leslie Heald and Suzanne Guerra, which identified and recorded all above-ground historic resources within the plan area. Prior to the survey an interview was conducted with Robert Thomas, Town Maintenance Chief, who had worked for the company for 30 years. This included a driving tour of the entire site to identify sites of buildings and structures which had been demolished or moved and a tour of the interiors of all buildings and structures considered individually eligible. All resources were photographed at the time of the field survey. All of the buildings, structures, archaeological sites and landscapes were recorded on California Department of Parks and Recreation series DPR 523 forms and incorporated into the Cultural Resources Survey of

the Samoa Town Master Plan Site for the comprehensive EIR prepared by Planwest Partners, and submitted to the County of Humboldt.

**CASE STUDY 2: MCGRATH BOARDING HOUSE/MARINE APARTMENTS:**

The McGrath Boarding House/Marine Apartments was included on a list of properties along the waterfront which could be impacted by the proposed development of the Waterfront Drive connection from G to J Streets. This area of the original tidelands had only been partially paved and had instead been the site of the first logging railroads on the waterfront. The McGrath Boarding House property is listed as a Contributor to the Old Town Historic District, which was listed on the National Register of Historic Places in 1991. Preliminary research was conducted at Humboldt State University Library, Special Collections, Humboldt Room; Humboldt County Historical Society; Humboldt County Library; and the office of the Humboldt County Recorder. This included previous published and unpublished histories and historical context studies, historic property nominations, prior surveys, professional journals and academic research papers. Research was subsequently conducted at the Environmental Design Library, University of California, Berkeley on prefabricated buildings and boarding houses, the National Register listings and updates, the California Register of Historical Resources, the California Landmarks and Points of Historic Interest, and the City of Eureka Local Register of Historic Places. A site inspection was conducted on September 5, 2012 when photographs were taken of the exterior of the building and grounds. The building and landscape were recorded on California Department of Parks and Recreation series DPR

523 forms and a summary report was submitted to the Cultural Resources Facility, Humboldt State University, and incorporated into a report for the City of Eureka in conjunction with a waterfront development project in the Old Town Historic District.

### **CASE STUDY 3: "LITTLE ITALY" NEIGHBORHOOD**

Most of the properties on this street had been purchased by a property development company which was converting some of them into apartments and proposed to demolish others. The Dal Porto house was the oldest of this group. This set of properties had not previously been studied as a potential historical resource under any local, state or federal historic property registration program. Preliminary research included a search of the National Register listings and updates, the California Register of Historical Resources, the California Landmarks and Points of Historic Interest, and the City of Arcata list of Historical Resources. These investigations uncovered an assessment of potential significance prepared by Susie Van Kirk for the previous owner. Further research was conducted at Humboldt State University Library, Humboldt County Historical Society, and Humboldt County Library, Humboldt County Planning Department, and the Office of the County Recorder. Archival collections consulted include the Pamphlet Files, newspapers on microfilm, and map collections, theses and student research papers in the Humboldt Room, Humboldt State University Library.

No previous oral history research on these properties or Italian American neighborhoods was found in any local repository. Interviews were conducted with Floyd

DaMassa, nephew of Charles and Teresa Dal Porto, and Lily Dal Porto Ghidinelli, daughter of Charles and Teresa, who both grew up in the neighborhood. Mrs. Ghidinelli provided photographs from her personal collection. A site inspection was conducted on August 3, 2005 when photographs were taken of the exterior of the buildings, structures and landscape. All of these resources were recorded on California Department of Parks and Recreation series DPR 523 forms and a final report was submitted to the client, Planwest Partners, Inc., Arcata, California, for a CEQA analysis report required by the City of Arcata.

## CHAPTER IV RESULTS

This section presents the results of the analyses of three case studies of cultural landscapes on the Northcoast.. These were developed from the historical resources documented in reports submitted to the County of Humboldt-Planning Department, the City of Eureka and the City of Arcata. For each report, the properties' historical background included a location map, historic context, and description of historical development.

A set of tables provides a summary overview of the case studies. These are based on the theoretical framework employed by Melnick (1984) and by David H. Cops in their guide *Views from the Road. A Community Guide for Assessing Rural Historic Landscapes* (Birnbaum 1994; ; Cops 1995; Melnick 1984). They incorporate the standard criteria for evaluating the significance and integrity of historical resources under federal and state guidelines for the identification and evaluation of potential historical resources (Melnick 1984; Shrimpton, Andrus, Staff, National Register 1990). Table 1 offers a summary and comparison of all three of the cultural landscapes with more details about each property included in Tables 2-4.

There are five categories of analysis presented in each individual table. The first category established the theme or historic contexts under which each landscape was evaluated. These are based on the overview of the cultural landscapes of the Northcoast, which were presented in Chapter I. Then the property is evaluated under a set of criteria

for determining significance and integrity established by the National Register program and incorporated into state codes regarding historical resources. These criteria are used to assess every type of potential historical resource including buildings, structures, objects, historical sites and cultural landscapes (McClelland et al. 1989).

The next step is to identify the major category or type of landscape. Based on National Register guidelines, every cultural landscape is either a designed landscape that is the product of a plan or a vernacular landscape that has evolved over time through use and with no specific design. This is followed by a list of the eleven characteristics of cultural landscapes as identified in the National Register guidelines and also outlined in the Copps book, *Views From the Road*. The Eligibility Notes provide a brief description of the final outcome of the development project for which the environmental review was originally conducted, or any property owner action.

Table 1

An Examination of Cultural Landscape through Cultural Resources Evaluation of Samoa Company Town, McGrath Boarding House and the “Little Italy” Neighborhood.

PROPERTIES	Samoa	McGrath	“Little Italy”
Historic Theme			
1. Indigenous & Cultural Landscape	NA	NA	Italian immigrant
2. Landscape of Settler Colonialism	Tidewater Lumbering	Gold Rush waterfront	NA
3. Worker Housing	Industrial	Boarding House	Immigrant
4. Labor Housing & Company Towns	Company Town	Working class	Working class

PROPERTIES	Samoa	McGrath	“Little Italy”
Evaluation-Significance			
A. Broad pattern of events in history’s	Redwood lumber industry; company towns	Settlement Period (1850-1885) ; Tidewater lumbering;	Immigration; “Little Italy” in Arcata
B People	NA	NA	NA
C. Architecture	Company town	Early prefabricated	Bungalow
D Potential to yield info.(archaeological)	1 documented site	NA	NA
Evaluation- Integrity			
1. Location	Original site	Original site	Original site
2. Design	Architectural designs, original plans	Prefabricated; Italianate additions	Vernacular; Craftsman,
3. Setting	No significant alterations	Alterations to landscape	Neighborhood greatly altered
4. Materials	Original or of the same type	Original or of the same type	One original; one with major alterations.
5. Workmanship	Original, site adaptations	Original, period additions; some new materials	One original, one greatly altered
6. Feeling	Historic sense of the past	Historic sense of the past	Compromised sense of the past
7. Association	Period appearance and setting	Period neighborhood, since 1862	Remnant neighborhood
Landscape Type			
1. Designed	Planned industrial community	NA	NA
2. Vernacular	NA	Tidewater Era’ industrial; marginal land	Ethnic immigrant, marginal land

PROPERTIES	Samoa	McGrath	“Little Italy”
Landscape Characteristics			
1. Land Use Activities	Industrial & Residential	Residential	Residential
2. Patterns of spatial organization	Planned community	Street, unfinished road below	Residential; adjacent, property shared yards
3. Response to natural environment	Reclamation	Adaptive	Adaptive
4. Cultural traditions	NA	NA	Italian immigrant
5. Circulation networks	Extensive footpaths; roads, streets; boardwalkways stairs; rail; Bayfront	Paths, street	Overgrown paths; street
6. Boundary demarcation	Fences, tree lines, roadways	Fence, natural bluff	Fence , retaining walls
7. Vegetation - land use	Adaptive	NA	Subsistence; fruit trees, grapevines, garden space
8. Buildings, structures, objects	Commercial; residential; industrial	Residential; commercial	Residential Outbuildings, animal pens
9. Clusters, groupings	Functional; recreational, garages and outbuildings	NA	Outbuildings, garden terraces, fruit trees
10. Archaeological sites	1; historic	NA	NA
11.Small scale elements	Wooden signs, walkways, retaining walls	Railroad tracks; retaining wall	Retaining wall
<b>ELIGIBILITY NOTES</b>			
	Eligible as historic district, design guidelines required.	Individually eligible; landscape alteration by redevelopment.	All subsequently demolished or remodeled

## CASE STUDY 1 SAMOA: THE HOME OF INDUSTRY

Company towns were created in a deliberate effort to create a dependable and loyal industrial worker. Company towns were typically located close to the worksite and, just as with lumber camps, the distance between the two was usually just a short walk. This was a landscape of industry with the worker neighborhood and the work site planned as integrated components. Industry owned or dominated communities were associated with a paternalistic approach to labor management. Samoa was created during the Progressive Era, and incorporates elements of the “model industrial town” with architect designed housing and industrial welfare programs directed at the entire family. The mill site had been largely demolished at the time of the study and references to the mill site are based largely on archival research and a field site inventory (Allen 1982; Carlson 2003; Dinius, and Vergara 2011; Roman 1993).

The transformation of Samoa, and also of Scotia to the south, from industrial site and company owned town to a purely residential development is fairly recent. Since 1892, the life of the company town of Samoa has been focused on the redwood lumber industry, housing current and former employees within view of the industrial site. Only since the sale of the town, in 2000 when it was purchased by the Samoa Pacific Group, has the town ceased to be actively associated with the industry. The creation of the town and mill site and conversion of the previous landscape of sand dunes, wetlands, tidelands, thickets and woods, required the application of a design and technologies that reflected the values of 19th century industrialists. The alterations to the mill and town site

mirrored the manipulation of the natural environment just as much as the railroad lines and portable camps which constituted industrial logging penetrated into the forest. The management approach of the town reflects a view of labor as a tool that is both essential and malleable. Technology had not yet begun to replace the worker in this industry so a reliable labor pool was essential. Labor was also considered malleable in that it could be shaped by an engineered social system.

In 1893, lumbermen Edgar and Silas Vance purchased property in Samoa for construction of a lumber mill. The Vance brothers had constructed a new sawmill, planing mill, boiler house, and railroad line, plus a cookhouse and boardinghouse to accommodate workers. In 1900, the Vance operation was purchased by A.B. Hammond, an industrialist who had made his first fortune in Montana. Hammond wanted a west coast base and sought to expand the operation in Samoa and, to ensure a stable and adequate labor supply, he began construction of a company town. Beginning in 1902, Hammond constructed additional bunkhouses, single family homes for married workers, a company store and other amenities. The town was expanded again in the early 1920s by A.B. Hammond's son, Leonard C. Hammond, who had become General Manager.

In 1956, the Georgia Pacific Corporation purchased the Hammond business and operated it as a subsidiary until 1971, when ownership was transferred to Louisiana Pacific Corporation. In 2000, approximately 174 acres of the former lumber company holdings were purchased by the Samoa Pacific Group LLC. In 2002, the Samoa Pacific Group proposed to refurbish existing housing at Samoa, add new housing units, create a

business/light industrial park, and establish a cultural and museum center near the existing Cookhouse. A cultural resources study of archaeological and historical resources was conducted as a part of the required Environmental Impact Report. The study identified five archaeological sites within the plan area, all potentially eligible for the California Register of Historical Resources. The study also identified the town itself as a potentially eligible historic district, significant for its association with redwood lumbering; as a highly intact example of an early 20th century company town; and for its ability to teach us more about company towns and worker life in them. This historic district includes 227 buildings, structures and sites and numerous landscape features which together constitute a cultural landscape.

Around the time of the sale of the town, a number of original records were donated to Special Collections, Humboldt State University Library. Most materials in this very large collection were still unprocessed at the time of the study but many were made available in order to document the architecture, engineering, and management of this place. Though the mill site has been largely demolished, the town of Samoa is still largely intact and the unique archival record is now accessible and helps to recreate the landscape of the industrial site. Together they provided a rare opportunity to revisit a cultural landscape that is typical of an industry and that in turn influenced the shaping of the Redwood Region.

In 1911, the various Hammond operating companies in Humboldt County, central and southern California, and Oregon and Washington were merged into the Hammond

Lumber Company, New Jersey. Although born in New Brunswick, A.B. Hammond had arrived on the West Coast with over 20 years of experience as a merchant, investor, banker, lumber broker and railroad owner in Montana. Hammond had already made business investments in the Columbia River salmon canneries, and mills in Washington and Oregon. The Vance Redwood Lumber Company was already one of the largest redwood lumber companies in the world when Hammond began acquiring mills and retail outlets in California and Oregon. That same year, the Hammond Lumber Company became the first major redwood lumber company to log all year and the mill at Samoa was upgraded once again. (Mengel 1974).

Samoa had not been planned as a company town; local developers had begun to promote the Samoa Peninsula as a resort. The Vance Lumber Company had seen no need to create a separate worker community but A.B. Hammond, had very different ideas about the relationship between labor and management. The worker village at Samoa is a reflection of an overall set of land use and labor management practices that characterized all of the Company's operations in this region, including their other company towns Big Lagoon, Crannell, and Fieldbrook, and their mobile logging camps until the sale of the company in 1956 (Allen 1966; Cornford 1987; Crawford 1995). A recent study chronicling Hammond's operations in Montana, Oregon, and Washington demonstrates a consistent approach to labor, finance and management. Hammond maintained tight control over his business interests, and his closest associates remained the members of his extended family and his closest friends. (Gordon. 2014). All of the major elements in the

village of Samoa, as well as the expansion of the Samoa mill site and associated transportation corridors, were to be planned and constructed at once. The layout and function of the company town, including the social welfare programs created by the Vance Redwood Lumber Company, and its successor the Hammond Lumber Company, demonstrate the accepted management practices of progressive businesses of that time (Crawford 1995).

During the 19th century, labor shortages were prevalent in Humboldt County due to its relative isolation, and workers could maintain some flexibility to change jobs. Wages followed the fortunes of the industry as well as the larger economy. The average monthly wage for a mill worker in 1893 was \$37.54, for a logging company worker \$43.34, farm workers earned from \$20-\$35, and clerks ranged from \$40-\$60. By 1892, there were 50 mills in Humboldt County, producing finished lumber and shingles, tank material, pipe stocks, coffin material, pilings, clapboard siding, posts, ties, stakes, lath and pickets (Cornford 1987; Eddy 1893).

Historian Daniel Cornford, has identified several factors that made it difficult to sustain an organized labor movement in the local lumber industry. From the very beginning, the lumber industry had always been sensitive to the prevailing economic climate. A depression during the late 19th century caused local declines and closures. Logging work was also seasonal, logging operations could be widely dispersed, and even mills that operated year round might reduce operations. This made it difficult for labor organizers, who depended upon a stable workforce for their membership. Ten assemblies

of the Knights of Labor had been founded in Humboldt County between 1884 and 1886. There had also been a few attempts to organize other workers in 1866, when a branch of the Coast Seaman's Union was established in Eureka, along with the International Typographical Union and a local clerks' union (Cornford 1987).

Company towns and inland labor camps restricted labor organizing by controlling access to the work site, prohibiting organizing efforts within the grounds, and by firing workers who were actively involved. This also meant potential eviction from the town since non-employees could not rent homes (Cornford 1987; Melendy 1952). According to one former employee, in the 1970s workers were still discouraged from actively participating in on site activities such as posting flyers or discussing union meetings by being transferred to a different job or moved to a different shift (Heald, Guerra, and Cannon 2004).

The first local mill owner-operators, John Vance and William Carson, had sometimes taken pains to show benevolent interest in their workers, in part to avoid labor unrest. Mill operations in the tidewater lumbering era were smaller; the average employed 10-25 men on a seasonal basis with the largest employing no more than 100, with few intermediaries shaping relations between labor and management. The first large mills in Humboldt County had been located primarily in Eureka, which had become a mill town. Lumbering was then a seasonal occupation and many men would rotate between farming, fishing and logging for employment. Most lumber workers at that time were young single men and lived in waterfront hotels and boarding houses, or bunk

houses in the logging camps. In Eureka, the business and residential community had developed in the streets surrounding the Bayfront industrial sites. (Buckley 2000). On the Samoa Peninsula, access was limited because there were no roads and everyone had to cross the Bay by ship or ferry. .

Workers from many different backgrounds interacted in these communities, through their political activities, fraternal associations, as well as in the workplaces. In this environment, local lumber barons deliberately cultivated a paternalistic image by offering company sponsored activities for children, annual community events, and funding civic improvements designed to appeal to the workingman. The image of the successful lumberman as having worked his way up from humble origins was true of many of the first company owners, and acts of benevolence could be perceived as proceeding as much from a real empathy for the common man as from enlightened self-interest. All of the first mill owners resided locally and had various other business interests in the area. This paid off politically, such as when John Vance was elected Mayor of Eureka by a two to one margin (Cornford 1987).

All of this began to change with the acquisition of local lumber companies by absentee owners. Under the new consolidated lumber companies, employers could afford to recruit laborers nationally, often at lower wages than were offered locally. They also recruited recent immigrants in order to reduce the potential for workers to organize collectively (Cornford 1987; Roman 1993). They imported labor from San Francisco, the Midwest and the East, by offering to pay half of the railroad fare of \$50 after six months

of service. Workers became wary of the tactics of these new “outside” capitalists when they became blatantly anti-labor (Cornford 1983; Cornford 1987). William Carson had warned the newcomers, Hammond and the outside investors who owned the Pacific Lumber Company that this kind of action would “do more to foster the growth of labor unions here than anything else...” (Cornford 1987, 54). Hammond’s letters to the editors of the Humboldt Times and Humboldt Standard criticized labor leaders and ridiculed the idea of negotiation with employees and he would soon become notorious within the labor movement for his anti-union positions (Cornford 1987; Onstine 1980).

A.B. Hammond’s goal, and that of his associates, was to gain greater control over the workforce. The company could shape employee-employer relationships, socialize immigrant workers to “American” attitudes,” avert or diffuse employee discontent by providing amenities, and foster workers’ loyalty to and identification with the employer (Roman 1993). In turn, the company would provide maintenance free low cost housing, recreational activities, a school, and stores (Crawford 1995). Hammond also wanted to avoid some of the problems that he had observed in other lumbering communities so he had eliminated several types of facilities.

Intoxication on the job had become a safety issue in the lumber industry, a danger to both mill and railroad operations, so he did not allow the sale of liquor and prohibited saloons and bars in the town. Fraternal organizations and fraternal halls were not permitted as he considered them sites of political and labor organizing. Churches were not necessary since Eureka and Arcata had several and were readily accessible. There

were no roads to the Peninsula at that time and most people traveled via ferry while larger shipments arrived on the company rail lines. Since the company owned the dock, the railroad line and the ferry system, this would be an advantage in case of labor actions because they could control access to the town and worksite. Employees considered essential to the entire operation would be required to live in Samoa, everyone from the managers and shop foremen down to the cooks and servers in the Cookhouse.

The plan was to create an integrated operation that would serve both the mill site at Samoa and as the headquarters of operations within the region, as reported in the Daily Humboldt Times (Daily Humboldt Times 27 November 1903).

To house the employees of the Samoa plant, seventy-five cottages and nineteen five room houses are already completed and many more are being constructed. These dwellings are equipped with all modern improvements including electric lights and patent toilets. A sewer connects each house with a main sewer which empties into the bay. A fifteen room hotel is now being constructed with all modern appointments, for the accommodation of the clerks and tallymen and others holding positions of trust with the company... The large office building is ready for occupancy. It is designed on the combination plan with the main offices on the ground floor and the private offices, engineering and drafting rooms upstairs. Connected with this building is a hall 90 X 30 feet, fitted with a stage and dressing rooms. ...

Below the hall is the company's store. A large waiting room in natural wood occupies part of the ground floor of the building and will be used by the passengers of the Eureka and Klamath River Railroad...

Hammond had begun the conversion of Samoa in 1902, and the Daily Humboldt Times (Daily Humboldt Times 17 January 1902) reported the construction of more bunkhouses for single workers and a dozen new cottages designed to accommodate families. Bunkhouses were a typical component of most lumber camps, and had remained fairly simple in design and usually featured a large open room with rows of bunks along the perimeter walls and a stove in the center for heat. The first new units at Samoa were designed similar to barracks with communal sleeping rooms and onsite showers and laundry facilities. Later buildings would feature single and double rooms, a reading room or library, a barber shop, and a recreation room, along with the basic amenities. These buildings were clustered around the large new cookhouse which was open during all mill operating hours. The resident crew of cooks, assistants, and servers lodged upstairs while the head cook lived in an adjacent cottage. Logging camps were also to be provided with similar amenities, and portable buildings such as schools, offices, bunkhouses, and cookhouses, would be constructed on skids so they could be moved to from camp to camp (Cornford 1987).

At the time that the company had been sold, the Vance farm and orchards at Essex, site of John Vance's original Big Bonanza Mill, provided food supplies for the cookhouse. The new company dairy, located north of town, now delivered fresh milk every day. The Samoa bakery provided bread for company logging camps, while the butcher shop provided meat, with supplies shipped out every day on the company rail lines. A large chicken farm, for poultry of all types, was constructed just northwest of the

cookhouse. Up to one hundred pigs could be fed on refuse from the cookhouse at the adjacent five acre hog farm. The Daily Humboldt Times (Daily Humboldt Times 15 January 1904) could now report that new rail lines connected to the cold storage warehouse so that meat and supplies might be loaded directly into the rail cars bound for the field camps.

During the early 1900s, an image of a good home for the worker had begun to crystallize; it was in the suburbs, with a tiny yard and fresh air for growing children. The small, simply built square cottage based on colonial designs was reintroduced at the Philadelphia Centennial became a visual inspiration to social reformers and designers of the model company towns (Crawford 1995; Wright 1981). According to The Daily Humboldt Times (Daily Humboldt Times 6 March 1904) many of the buildings and structures that established the essential character of the village during this period were designed by Mathias DeLin, company architect, working with C.K. Cadman, the Superintendent of Construction.

The first homes were modest designs for the nuclear family unit and did not accommodate extended family or boarders. Single parent women and widows were rarely present in a company town unless employed. Most social and cultural activities took place outside of the town, while community events were held in the assembly hall at the Samoa Block. Houses were set close together with a small yard in front and shared storage buildings in back. Tenants were encouraged to plant gardens in order to recreate the familiar landscape of home. Social service programs at this time took the form of

recreational activities for the largely male population and self -improvement. The emphasis was on a modest efficient home and healthy activities (Heald, Guerra, and Cannon 2004).

Simplified versions of the gable roofed worker cottage were adapted into portable units used in field camps for offices, bunkhouses, recreation rooms or cookhouses. At this time, company housing and company towns in most industries did not vary much in style or materials, especially those in a rural setting (Garner 1984). However, a lumber company could use this as an opportunity to make use of surplus materials and showcase their products for residential housing. Housing for the skilled workers and mid-level managers was usually larger and, in style and appearance, was similar to homes found in most middle class residential neighborhoods.

As with most of the land around Humboldt Bay, the landscape was reshaped for utilitarian purposes, diked and graded, filling in marshes and leveling sand dunes. The original mill had been placed at the edge of the tidelands, where a small section of the shoreline was blocked off for a log pond. The Bath House for the former resort would be torn down and replaced by the Samoa Block company offices. The new town was constructed in a landscape of sand dunes and seasonal wetlands while the expanded mill site had been created by filling the tidelands with sand from nearby dunes and then dumping in pilings and logging debris. This would also level the dunes to provide building pads for more homes. The Daily Humboldt Times (Daily Humboldt Times 27

November 1903) provides an ongoing account of the construction that was underway at this time:

The sand dunes surrounding these many improvements will soon bear vegetation as the company has at great expense reclaimed this wild waste and now has the entire place sown in Australian rye grass.

Work proceeded on the mill site and the village at the same time: Men and horses are busy cutting down the sand hills and laying out streets and building sites, while carpenters with saw and hammer are busy erecting homes. The streets are strong tramways built upon the sand. ...A nice plank walk leads from the bay directly through the town to the ocean beach...

Until graveled roads were constructed, horses were needed to pull the thick-wheeled carts around the planked lumberyard in the mill site, as well as to deliver milk from the company dairy north of town. This was a pedestrian friendly environment so roads remained narrow and limited until the advent of automobiles. Board walkways were constructed between the mill, factory, shops, cookhouse and other facilities, with board side rails, landings and steps to bridge steeper gullies and dunes. Board retaining walls edged yards, paths and roads, and created level building sites. Neat picket fences surrounded the cottages and yards. Top soil was brought in to be spread around the yards for small lawns and gardens.

Workers were encouraged to identify with their house as a home rather than as simply a part of their wage. Communities could be closely bound together by kinship. Families tended to migrate to places where they had relatives, and when and if their

children married in the worker village they created further family ties (Wright 1981). In Samoa, applications for housing from workers during the 1950s through the 1980s frequently cited a desire to return to the community to reside near friends and other family members and to provide good schools for their children (Housing Manager 2003).

Although the town was constructed to attract families, lumbering was a gendered occupation and mill workers as a group were largely male. While the bunkhouses were still in use, the majority of residents of the town were males though bachelors usually had no interaction with married men after work hours. /Bunkhouses were self-contained units all located adjacent to the cookhouse located on a bluff above the rail yard while family residences were located south of the bunkhouses in the center of the town site.

Aside from the village schoolteachers, cleaning, cooking and serving, and laundry were the only occupations open to single women at the time the town was constructed. The few single female workers in Samoa lived in a female dormitory at the cookhouse, Cooks in field camps were generally males or older married or widowed women with their own cabin. Though the wives of employees might also work outside the home it was not encouraged. City directories from the first two decades indicate that few female residents of the company towns of Scotia or Samoa were employed for pay, though former residents might refer to regular barter and exchanges of services such as laundry, cooking, or sewing. Some residents at that time have commented that the company did not want wives to bring in extra income and reduce dependence on their husband's paycheck. .By 1930, women were employed in office positions in both company towns,

and Scotia had begun to employ women in lower level roles in the mill (Directory of Humboldt County 1898; Carlson 2003; Eureka City & Humboldt County Directory 1905; R.L. Polk & Company 1928; Roman 1993; Wettenberger 1924).

By 1920, the average industrial town provided company built housing for only a third of the workers, typically skilled workers and management. Social programs at that time were also designed to reinforce hierarchy and upward mobility among employees, with the wives of skilled employees and managers serving as appropriate role models (Wright 1981). The Hammond Lumber Company had established the first program focused on women in 1904. Mrs. G.W. Fenwick, wife of the Samoa mill Superintendent, and Mrs. W.R. McMillan, wife of the plant manager, instituted physical culture classes and a Home Circle Club (Melendy 1952; Mengel 1974). In 1916, a Bluebird Troop, a branch of the Campfire Girls for primary school girls, was established (McCormick 1992). In 1924, Mrs. L.C. Hammond, wife of the new manager, initiated community beautification projects and encouraged the development of a Women's Club to host activities for women and families. The Women's Club House, also known as the Community Club, soon hosted the Parent Teacher Association, dinners, dances and social activities (Cornford 1987). The first Girl Scout Troop in Northern California was formed, along with a local Boy Scout Troop (McCormick 1989).

Samoa Hall, a large theater and assembly room at the top of the new Samoa Block became the social center of town. The Daily Humboldt Times (Daily Humboldt Times 29 October 1903) reported dances and card parties sponsored by the Volunteer Fire

Department, as well as company sponsored movies, and exhibition boxing matches. Beach parties and picnics at New Era Park in nearby Fairhaven were also popular. Sports teams not only structured leisure time but also served as object lessons in discipline and obedience to rules. By sponsoring a favorite pastime, owners also hoped to transfer the workers loyalty from the team to the mill (Crawford 1995). In 1904, the newly organized Samoa baseball team played at New Era Park. Recreational activities such as boxing, bowling and basketball teams were organized by the Company's housing manager (McCormick 1989).

By the end of the decade, family housing in Samoa accommodated 500 workers. Those who preferred to live in Eureka could commute by ferry, or took the train through Arcata. Company stores usually encouraged workers to shop by providing credit, sometimes in the form of scrip or coupons, or simply established charge accounts. At Samoa, the Company allowed workers to charge meals at the cookhouse and at the dining hall at the Samoa Block, with payroll deductions for the market, butcher, bakery, rent, and later at the gas station. By 1909, wages for skilled workers averaged \$1.75 per day, and around \$2.20 by 1920. The average mill worker earned much less, though a single man might still save money by staying at the bunkhouse and buying his meals at the cookhouse. Rent for a two or three bedroom home in Samoa then averaged \$20 per month including utilities (Heald, Guerra, and Cannon 2004).

Potential tenants filled out an application form that included questions on length of employment and present position as well as family size and references. Applicants

were evaluated on the basis of their employment record as well as past history of residence, a factor that was sometimes mentioned in admonitions to current tenants. Despite this, there was usually a waiting list for housing. Homes were technically not assigned by class or ethnicity but rather according to the employees' rank in the company, which was influenced by both. It was understood that skilled workers, supervisors and managers always received better housing. Consequently most towns had a small population of ethnic or non-white workers (Carlson 2003; Crawford 1995).

At this time, Italian immigrants constituted a high percentage of the workforce in the lumber industry in California. In Samoa, the resident work force by 1920 included immigrants from the Azores, Mexico, and Italy. Logging and railroad crews were more ethnically diverse with crews of Russian, Croatia and Finnish workers. Although California Indians were a significant percentage of loggers in the field, few were identified as working at the mill or found to have lived in Samoa at this time. In Scotia, one residential street contained a number of immigrant workers but most of them lived nearby in Rio Dell (California. Dept. of Industrial Relations 1912). The homes of the management staff might be upgraded with new plumbing, storage or kitchens more frequently. Bob Thomas, retired Maintenance Chief for the Housing Office, in a conversation on September 25, 2003, recalled that in the 1970s the homes along Sunset Avenue were still referred to as "Snob Hill."

The rental agreement outlined a set of guidelines that were used throughout the operation of the company town. Tenants could not sell meals, take in boarders or sublet

the house, which could undercut the profitability of the company services. Tenants would comply with rules and regulations established for employees, prohibiting the use of foul language, public inebriation, or creating a public nuisance. Complaints might be submitted by neighbors, supervisors or co-workers to the Housing Office, and continued infractions could lead to eviction. Once the tenant ceased to be an employee they were required to vacate within three days, though during the Depression or in case of personal hardship this rule was often relaxed. Tenants were required to maintain the house and premises, which were subject to periodic inspections by the housing maintenance crew. Rent and damages were deducted from employee paychecks (Housing Manager 2003).

The Samoa school was constructed within the five years of the completion of the first housing in the town to serve elementary grade students. Middle and high school students could take the ferry to schools in Eureka. The classroom could be the most egalitarian space in town, where children of every resident employee attended. The company provided summer jobs for older children who would help by painting houses or building fences. As described by a resident who grew up in Samoa, daily life for the families in Samoa was very similar to that in any local community around 1918:

The shipyard was off-limits to us but not the rest of the company waterfront. On any summer evening, the wharf would be lined with people of all ages fishing with hand lines. Directly east of the school yard and over a ridge was a little valley where picnics were held almost weekly during the summer. This was a sheltered spot where various games and picnic tables were set up. Just south of that, near the trail that led from the school to midtown, was a huge Spruce tree. A big horizontal limb, some twenty feet above

the ground, provided a place for a large rope with a board tied on the bottom... In the early spring, long connecting ponds were formed in the sand dunes paralleling the present road south of town. Here we raced our rafts and took many a chilly dousing.

All of the kids found spare time jobs. There was wood to be chucked into sheds and carrots to be weeded for Mr. Pedro at the company farm. The laundry route was profitable. The laundry was collected from the homes on Mondays, shipped to Eureka via the steamer Antelope and delivered to the owners on Fridays. My favorite job was as assistant to the movie projectionist. I met the boat bringing the film from Eureka and rushed it to the Hall on a steel-wheeled cart, then helped in the projection room where the reels were shown one at a time. This was a family effort, where one sister printed the handbills which were delivered door to door during the week and another sister served as cashier in the Hall (Price 1987, 22).

In 1922, Leonard C. Hammond, son of A.B. Hammond, was appointed as manager at Samoa. He had spent some of his vacations at Samoa, visited other lumber camps during his college days, and was acquainted with staff. A Stanford graduate and engineer, during his brief tenure L. C. Hammond supervised the design and construction of the last employee housing tracts as well as more community facilities (Cornford 1987). In 1924, the Hammond Lumber Company purchased the last three private residences in Samoa and began the final intensive phases of company housing projects. In planning the changes he also incorporated new ideas about the design of communities. The large gully, edged by new retaining walls and walkways, would become Samoa Park. Five new garage units were placed along "Gasoline Alley," a graveled road flanked by embankments on the southwest side. The Arcata Union (Arcata Union 1 February 1923) would report that the new Samoa Gymnasium, constructed on Vance Avenue near the

present day Peninsula School, was soon considered one of the best facilities in the county. The building offered basketball courts, a stage for boxing exhibitions showers and dressing rooms, and steam heat (“LP/Hammond Samoa Collection” 1873).

A new baseball park, with bleachers, was created on the north side of the gymnasium. Baseball had arrived locally before the turn of the 20th century and became popular with both men and women. The Hammond Lumber Company, Northern Redwood Company at Korb, Pacific Lumber Company at Scotia, and the Little River Redwood Company at Crannell had formed the Industrial Baseball League. The Company provided uniforms and a playing field, with hard dirt hauled in for the infield (McCormick 1992). In 1923, the Humboldt County Baseball League was formed with teams in Eureka, Arcata, Scotia and Samoa.

While labor levels might remain steady, it was not unusual to lose 25% or more of the labor force each season as they traveled in search of better pay and working conditions. Workers paid for their room and board in the camps and in bunkhouses in these company towns. Due to the high caloric intake required for these physically demanding jobs, men sometimes quit abruptly and crews were known to have stopped working in order to register their dissatisfaction with the food or the cook. A few historians have noted that the ability to withhold labor over food was considered an important strategy by laborers, and one of the few areas where they could successfully negotiate with management (Conlin 1979).

Workmen's wages had improved, and the cost for three meals a day at the cookhouse was now 60 cents (McCormick 1992). Rents from the 1920s into the 1930s ranged from \$11 to \$25 per month. The houses available ranged from a single-story, 650 square foot two bedroom unit, to a two-story, 1,200 square foot three bedroom unit. Factory dried wood scraps were provided as heating fuel for 50 cents a load, to cover the cost of the driver, horse and wagon. Utilities, maintenance and improvements on all company buildings and structures, including the homes, was still provided by the company (McCormick 1989).

By the end of the expansion period the entire sawmill had been modernized. A large railroad shipping warehouse had been constructed on the Bay, expanded to 900 feet long, it became a local landmark. When the work was completed, in 1924, it was the most extensive modernization of the mill operation since its original construction in 1893 (McCormick 1989; Mengel 1974). At the same time, the lumber industry was undergoing a change due to technological innovation and the depletion of old growth lumber which would create the new forest products industry. Operations shifted from areas of once heavily forested land, while new products were being explored in an effort to capture waste material generated by the mills.

The Depression slowed construction everywhere and affected foreign and domestic markets. Only four sawmills were in operation locally in 1931, including Dolbeer & Carson at Eureka, Pacific Lumber Company in Scotia, and the Hammond & Little River Lumber Company at Samoa and Crannell (Melendy 1952; Mengel 1974).

Workers saw a 10 percent reduction in their wages that same year. Many workers in Samoa felt fortunate to have both a home and a job. By scheduling shorter work periods and suspending operations several days per week, the renamed Hammond & Little River Lumber Company was able to retain many workers. Even the cookhouse closed for a time, and workers were shifted to the mill (Adams 2003; Onstine 1980).

The building boom after World War II provided other opportunities in construction and in the new forest products industry for many workers. New schools and new homes were being built and affordable to workers so life in the company town was no longer the most attractive option. Longstanding issues had been set aside by labor and management during wartime, and by 1946 workers had again begun to organize and all the major mills in the region went out on strike. The Hammond Lumber Company was the last major lumber company in the region to accept a union shop.

Worker safety had long been a concern in the lumber industry. Previously, with no death or disability insurance for workers, company attorneys had fielded numerous legal claims from disabled workers and the families of deceased workers. Management notes on some of these cases make it clear that injuries were viewed as largely occupational hazards. A resident company doctor had been hired in 1920, and an infirmary located across from the Samoa Block, mandating a company imposed safety program. In 1937, 628 accidents were reported at the Hammond Lumber Company, one for every two or three employees. Under a union shop in 1946, the company would

institute safety committees, composed of representatives from different departments, safety inspections and first aid classes (“LP/Hammond Samoa Collection” 1873).

In 1956, Georgia Pacific, in what was then called “the largest lumber deal in California history” purchased the company (Mengel 1974). The new owners focused on conservation and the pulp and plywood market where once the redwood lumber mill had been the sole focus. Their new plywood plant, opened in 1959, would employ fewer workers because of the major shift to automation. Samoa now housed only key personnel and the majority of workers commuted from nearby towns. Many of the services associated with a company town were no longer provided. The old Hammond company town at Crannell was closed and eventually all of the buildings were demolished (Allen 1966). After a prolonged strike from 1982 through 1984, the company enclosed the mill area at Samoa, and the mill at Big Lagoon was closed and the company owned housing was eventually sold.

The mill and town were sold to Simpson-Samoa in 1998, which was primarily interested in the pulp mill and offered the 65-acre town site for sale in 2000. The Humboldt Beacon (Humboldt Beacon 21 September 2000) reported that the town had been purchased for more than \$1.7 million by local investors, Lane Devries of Sun Valley Floral Farms and Dan Johnson of Dance Construction Company. Most of the buildings and structures at the mill site would be demolished except for those considered safe for use as rentals, or of unique historical significance such as the Railroad Yard Complex.

The town had fulfilled the goals of its creators for almost 100 years by helping to ensure a dependable onsite workforce for an industry that dominated the region and created an industrial landscape. Absent the incentive of home ownership to encourage workers to remain, the homes and attendant social programs and services provided by the company were of significant value for working families. While it had not prevented labor organizing, the limited accessibility to the outside had provided some obstacles for a time.. Changing conditions in the lumber industry and in the communities nearby had made this type of housing unnecessary and eventually maintenance costs became a financial burden to management. For many of those who had worked and lived in the town, and the generations who had grown up there, it simply became home.

As a planned community, designed by architects and engineers, Samoa is a designed landscape created to meet the needs of industry. The management made a deliberate effort to create a unified identity for the community and did not permit cultural activities such as churches, fraternal organizations, or any cultural or recreational activities that were not sponsored by the company. The original site has been drastically altered so no signs of Indigenous habitation and culture were identified in the town. Table 2 provides a summary of the findings. A map of the entire company town site is included in Figure 1 and depicts the extent of the cultural landscape. Figures 2 through 4 provide examples of the worker housing in the town and the portable buildings in field camps. Figure 5 is an aerial view of the entire site and illustrates the integration of the town as a component of the industrial site.

Table 2

An examination of the Samoa Company Town as an example of a planned industrial community and designed landscape.

PROPERTIES	Samoa Company Town
<b>Historic Theme</b>	
Settler Colonialism	Original mill constructed during first wave of industrial lumbering; required massive alteration of previous landscape and setting; company significant in exploitation of redwood forests
Worker Housing	Housing integrated into industrial site, worker community of employees and families
Labor Housing & Company Towns	Company Town, control of physical and social space by management
<b>Criteria of Significance</b>	
A. Events, the broad patterns of history	Redwood Lumber Industry; Tidewater lumbering era; company towns
C. Work of merit, significant physical qualities	Company town architecture; engineering technology, site adapted building techniques
D Potential to yield info important to history or prehistory.	Documented archaeological sites, historic period
<b>Evaluation for Integrity</b>	
1. Location	Located on the original site
2. Design	Original architectural designs, confirmed with original drawings and plans, alterations consistent with design
3. Setting	Bluff and dunes adjacent to Bay mill site; mill buildings largely demolished. No other significant alterations to setting at the time of the report.
4. Materials	Materials for construction, maintenance and alterations are original or of the same type, largely manufactured on site
5. Workmanship	Original workmanship, built environment adaptations to site
6. Feeling	Historic sense of the past, largely continued in original use as residences, cookhouse;

PROPERTIES	Samoa Company Town
	surrounding natural landscape
7. Association	Period appearance and setting, except for loss of mill site
Landscape Type	
Designed Landscape	Planned industrial community, integrated maritime and railroad network.
Landscape Characteristics	
Land Use Activities	Industrial & Residential
Patterns of spatial organization	Planned community; single family units, commercial & office space; community services; recreation areas
Response to natural environment	Reclamation, major alteration of landscape, removing dunes, filling tidelands
Circulation networks	Footpaths; roads and streets; board walkways & stairs; railroad; Bayfront
Boundary demarcation	Fences, tree lines, roadways
Vegetation and- land use patterns	Original site was seasonal wetland ,tideland and dune, some native vegetation retained
Buildings, structures, and objects	194 commercial; residential; recreational, service; industrial buildings and structures; designed landscapes-parks, gardens, playing fields; ; transportation network.; eligible as contributors to historic district
Clusters, groupings	Functional; recreational, garages, outbuildings
Archaeological sites	1 site, historic period bunkhouse foundation
Small scale elements	Wooden signs, board walkways and stairs, retaining walls,
NOTES	
+	Historic district; a few properties individually eligible.

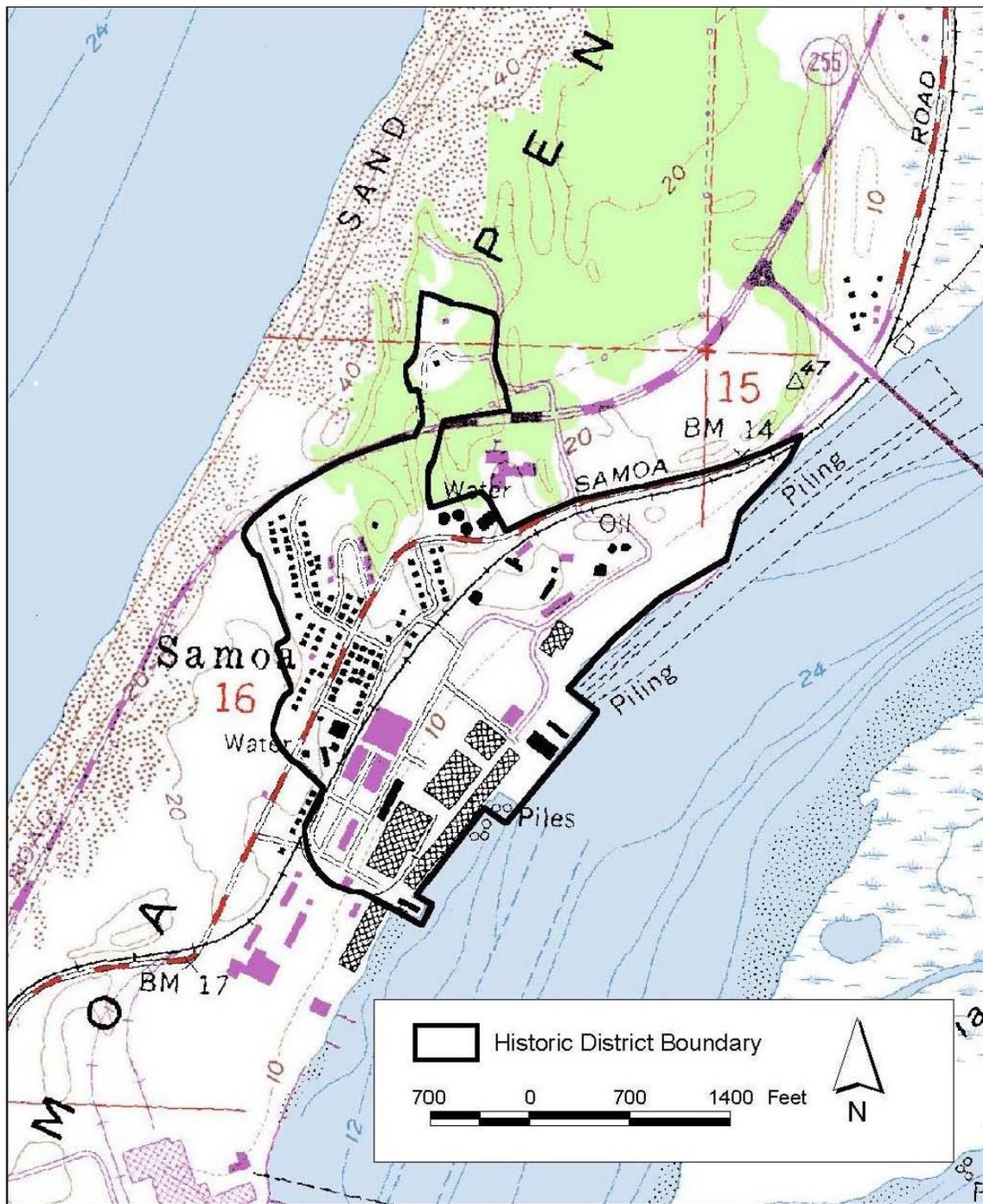


FIGURE 1: Location map of Samoa Historic District



*Figure 19. 6 Vance Avenue – This house is one of seven intact dwelling built according to an unknown plan in 1902 (Leslie Heald 2003).*



*Figure 20. 17 Vance Avenue – This larger house is one of four constructed according to House Plan #6 in 1903 (Leslie Heald 2003).*



*Figure 21. 125 Sunset Avenue - This simple bungalow is one of at least 13 renditions of House Plan #20 constructed in the early 1920s along Sunset Avenue and Samoa Court Extension (Leslie Heald 2003).*



*Figure 22. 9 Samoa Court Extension – This house was built in c. 1923. It is substantially larger than surrounding houses and in later years was the home of the pulp mill manager. It is the only house in Samoa of this design and there is no known building plan (Leslie Heald 2003).*

## FIGURE 2:

Residential properties, Samoa Company Town, Page 6. DPR 523 forms, Cultural Resources Survey of the Samoa Town Master Plan Site (Heald, Guerra, and Cannon 2004)

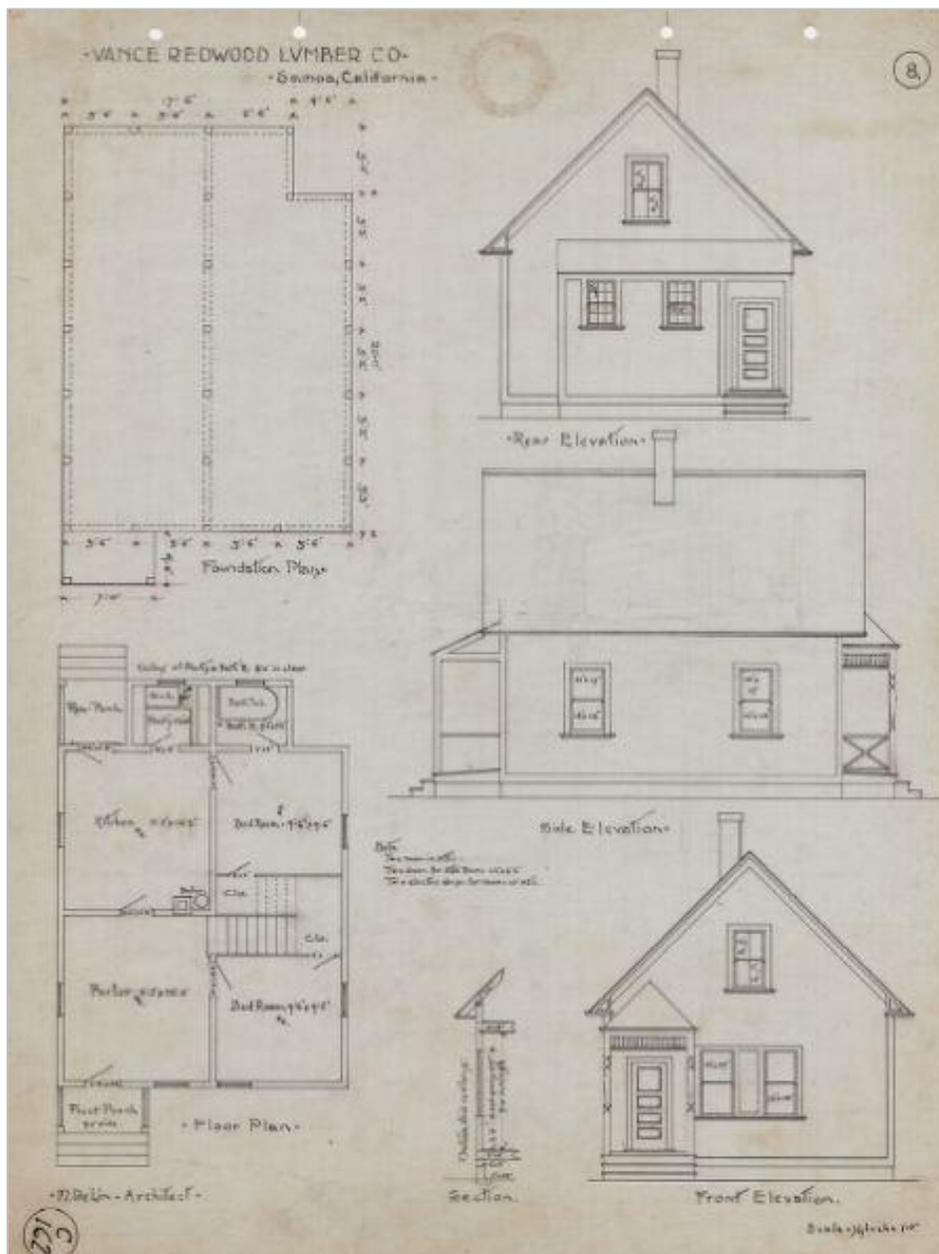


FIGURE 3:

Worker Cottage, Design Number 8, Sheet C 162, Vance Redwood Lumber Co. Samoa, California, circa 1903. Courtesy of LP/Hammond Samoa Collection, Special Collections, Humboldt State University Library.



FIGURE 4:

Portable buildings being hauled to logging camp, Hammond Lumber Company, circa 1910, Humboldt County . Courtesy of Boyle Collection, Special Collections, Humboldt State University Library.



FIGURE 5

Aerial View from east of Hammond Lumber Company, Samoa Operations on Humboldt Bay, and company town of Samoa on north and west side of industrial site (1946) (Heald, Guerra, and Cannon 2004).

## CASE STUDY 2: MCGRATH BOARDING HOUSE & TIDEWATER LUMBERING

Marginal lands are frequently contested spaces, serving as the location of camps and shacks for laborers, refuge and subsistence for remaining indigenous populations, and offering alternate spaces for activities not permitted in the dominant community. During the Tidewater Lumbering era these marginal environments remained on the fringe to be filled in as the urban area grew, or converted and “reclaimed” for other uses. As sites of home they offered a lower cost alternative to housing in town, the opportunity to buy their own property, and to configure the space and activities themselves (Ericson 1966; Giblett 1996; Vileisis 1997).

The McGrath Boarding House, known since 1949 as the Marine Apartments, is located in the oldest section of Eureka along Humboldt Bay. This area is recognized in the National Register of Historic Places as the Old Town Historic District. (OMB 1024-0018 United States Department of the Interior, National Park Service; Stanton 1990). The McGrath Boarding House is listed as a Contributor, a property which contributes to the historical significance of the District, and illustrates the early land use patterns along Humboldt Bay. The area surrounding Humboldt Bay was heavily forested with little flat or dry land. This was the Tidewater Lumbering Era, where waterways were the main transportation, so the tidelands became the site of the first industrial and commercial development on the Bay (Coy 1929; Giblett 1996).

The City of Eureka developed inland from the shoreline and the Old Town

Historic District documents the first industrial sites, and the commercial and residential areas of the city. Due to the limited amount of developable land at that time, this area of Eureka has a remarkable diversity of residences from this early period, from small cottages to large mansions. The first hotels and boarding houses were located adjacent to the mills, shops, wharves and warehouses on the tidelands which lined the waterfront.

The McGrath Boarding House is situated at 112 I Street on a bluff above the tidelands, a site platted in early maps as First Street. The building is now composed of four sections, the oldest of which is a prefabricated building which was shipped from Boston and was constructed in 1852 by Hugh McGrath as the family home. Due to his untimely death in 1861, his young widow Jane McGrath turned it into a boarding house. Boarding houses were common in the industrial West and boarding house managers were often widowed or elderly women. As the Humboldt Times noted at the time of Mrs. McGrath's death (Humboldt Times: Jan. 4, 1906), in Eureka these operations provided a significant amount of worker housing well into the early twentieth century. It is rare in that it has been in almost continuous operation as a boarding house or apartment complex since 1861 (Eureka Heritage Society 1972).

The McGrath family was actually fairly typical of the immigrants of the settler colonial period. Hugh McGrath was one of the original members of the Mendocino Company, one of the two companies of entrepreneurs that organized the town site of Eureka. McGrath is listed in local records as having been born in Maine or in New Brunswick in 1825, while parents and his older siblings were all born in Ireland (United

States Bureau of the Census 1860). His wife Jane Gibson was born in County Galway, Ireland on February 3, 1832 and left for Australia with her parents when she was still a young child. By 1852, 7,600 people had arrived in California from Australia, including 44% who had been born in Ireland. Irish immigrants who came to the United States from Australia have never been as well documented as those from Ireland, in part because census records at that time only listed the country of birth and not the last country of residence (Barrett 2001).

Local historian Susie Baker Fountain, reporting on the settlement of the Humboldt Bay Region in the Blue Lake Advocate (Blue Lake Advocate: 6/10/1965, 6/17/1965), noted that McGrath was known as a ship's pilot, carpenter, and entrepreneur. He had been employed by Ryan and company in laying out the city of Eureka boundaries and lots and also in putting up the so called "knock-down" or prefabricated houses that had been shipped from Boston.. As architectural historian Harold Kirker has described this period, "In the scramble for gold, building was reduced to a question of shelter" (Kirker 1991,15). California was experiencing a lumber and building shortage and these Gold Rush Era colonists housed themselves in brush shelter, arbors, blanket lean-tos, salvaged tents, and shanties of scavenged wood. Fires were a common occurrence and contributed to the scarcity of building materials. Most communities in the newly industrial West were temporary camps, "boom towns," and there were few permanent buildings at that time around Humboldt Bay. Most of the 150 people who resided in Eureka by April, 1950, were still living in tents or canvas sided structures. As late as 1860, soldiers

stationed at Fort Humboldt would still be quartered in Bucksport hotels due to the shortage of carpenters and lumber (Coy 1982; Hoopes 1971).

In the West, prefabricated wooden structures are an artifact of British colonization, which required rapid building construction in territories where colonists had little knowledge of local building materials or building skills. The most successful house at that time was the Manning Portable Cottage which was designed for export to Australia in 1837. Prefabricated buildings which could be purchased for \$300 to \$500 in New York or Boston, two of the centers of the building industry, might sell for almost ten times their cost in California (Herbert 1972; Lewis 2006). The origins of some of these buildings may be obscured over time as with additions, as in the case of the McGrath Boarding House (Buckley 2000; Eureka Heritage Society: 1972).

The McGrath house had been constructed at the foot of I Street in the new town of Eureka, adjacent to the municipal gas works, on a bluff above the tidelands. Although city streets had been neatly plotted on a map grid several years before, they were unpaved and this section of First Street remained under water for decades. The earliest lumber mills were clustered at the edges of waterways to receive logs that were floated down streams to holding ponds until they could be cut and loaded onto sailing ships. Timber industry settlements constructed during this period on Humboldt Bay, like those in the Puget Sound or San Francisco Bay, were adjacent to deep-water channels. Large wharves built on docks housed lumber awaiting shipping, while adjacent log ponds held logs awaiting milling. Tidelands might be covered with water part of the time but, along with

marshes, they required little clearing to create flat expanses of land (Guerra: 2008).

Wetlands were considered marginal lands “unfit for cultivation” except by draining and filling, and waterfront mills and business owners had no problems building on this fill. Although the McGrath house was one of a number of residences that were constructed in this neighborhood, it was at the edge of the industrial waterfront. At the foot of I Street one would find the large mill operation run by David Jones. The new City Gas Works would be constructed on the lot adjacent to the McGrath House. Though no one today would place a house next to a gas works or industrial site, at that time Eureka was fairly small and settlement was confined to just a few streets adjacent to the Bay so the location was convenient to its residents. In 1857, Hugh McGrath recorded half interests in several lots, including the lot on 1st and I Street where the house was located and one on 1st and E Street where he had a commercial building, and left both properties to his widow.

McGrath is said to have succumbed to "Dropsy," what we would describe today as cardiopulmonary disease, on April 19, 1861 at the age of thirty-six. By this time several of his siblings from New Brunswick had joined him in Humboldt County, and he left behind his widow Jane, age twenty-eight, sons Henry and George, aged 8 and 4, and daughter Kate, age 6. McGrath had tried to make provisions for his family before he passed on, appointing guardians for his children and a family attorney. He and Jane filed their residence as a homestead on April 3, 1860 just two weeks prior to his death. Census records indicate that they had one boarder already. All of these moves would help to

protect her interests in all of the property and allow her to remain fairly independent.

As a young widow with three small children Jane McGrath required more than the income from the McGrath commercial building. There were only a few options for employment open to women outside the home, primarily as laundress, cook or housekeepers. City directories and newspapers from that period list services such as seamstress, dressmaker or milliner operating out of a residential address, though more women may have been employed informally. Jane McGrath's decision to maintain the family home as a boarding house, supplemented by her work as a seamstress, allowed her to support her children in a respectable manner in her own home and to remain in Eureka near her husband's extended family.. This would be a convenient location for a boarding house, adjacent to the city gas works, only a block from the busy waterfront, with the railroad and the prosperous Evans mill below the bluff as recorded in historic maps of this area.

The typical jobs available for men at that time in mining, fishing, shipping, logging, and later in railroading, could be dangerous occupations. Lumbering killed more men at that time than any other occupation, falling trees in the woods, crushed by a log, scalded in a locomotive derailment, maimed by saws, or lost in a fire. No job offered any benefits for illness, death or injury. Though workers might take up a collection for the widow and orphans, accidents were usually considered occupational hazards by management and survivors might need to petition or take the company to court in order to gain small compensation. As a result women could easily become the sole support of

their families, and older children might leave school early in order to help their families. These conditions led to a pattern of single, divorced, and widowed women employed as boarding house or hotel managers, cooks or domestics in order to support themselves and their families which was still common locally into the early twentieth century (Carlson 2003; Guerra 2008; California Dept. of Industrial Relations 2000).

By 1854 there were already seven saw mills in Eureka. Prior to the construction of large residential hotels in the 1870s, typical housing arrangements in the Humboldt Bay region included extended family groups, unrelated people with similar occupations sharing a dwelling, or temporary shelter at the workplace. It was quite common for families to take in a relative, or a co-worker, for a little extra income. This pattern held true for several decades among immigrants as well as American born workers. Hotels catering to laborers would become notorious for crowding tenants into every available space, with beds in kitchens and hallways, and facilities might include only one bathroom or bathtub per building. Workers who could afford better accommodations, usually skilled or office workers often chose to live in boarding houses where they could be assured of a comfortable dwelling, meals, a bath and clean laundry. Some of these catered to an ethnic clientele, where workers could find familiar foods, newspapers and companions who spoke their own language (California. Dept. of Industrial Relations 2000; Guerra 2008; Heald, Guerra, and Cannon 2004).

The introduction of rail technology and the steam donkey would usher in a period of growth and prosperity in the region. By 1884, the town of Eureka had grown to 7000

residents and was now the County Seat. Within a few decades the neighborhood around the McGrath Boarding House had filled in with numerous residences, the first court house, the public school, city jail, commercial shops, and the County records office a few blocks away. Though surrounded by more substantial residences, the large lot across from the McGrath Boarding House usually hosted a tent town for seasonal laborers.

By the time she had sold the McGrath commercial building, Mrs. McGrath was able to add two new wings to the boarding house. This provided six adjacent rooms, which Sanborn maps indicate were accessible to the main house by a long hallway. Although this was a business establishment it was also domestic space. She still resided with her youngest son, who worked for the railroad nearby. She also had continued to offer her services as a dressmaker prior to this time, though she may have met her clients in their own home rather than inviting them to hers (Sanborn Map & Publishing Company Limited 1886).

The lumber industry now dominated the waterfront. In 1856, the City of Eureka had sold most of the parcels along the Bay to the businesses which occupied them in order to promote rapid growth. As a result, the City only retained 100 feet of the waterfront, primarily in property easements for existing streets. The area at the foot of I Street, the north end of 1st Street, was now filled with wharves and mills. In fact, this section of 1<sup>st</sup> Street would remain unpaved for more than 100 years and instead was turned over to industrial railroad lines. The tidelands had now become the industrial fringe of the City of Eureka. The large Carson Mill was nearby and worker housing

would eventually fill many of the neighborhoods nearest the mills and docks while commercial and upscale residential development had begun to move inland away from the Bay. Mrs. McGrath's boarding house was now surrounded on three sides by commercial and industrial buildings (Buckley: 2000).

After a series of worker actions in the agricultural industry in 1913, the new State Immigration and Housing Commission had been charged with improving and regulating worker housing conditions and many substandard facilities had closed. The new regulations also had an impact on lumber worker housing on the Northcoast, where worker complaints about housing conditions had largely been ignored by local officials. During this era, hotels served a largely young single male population of seasonal workers at the local mills and well as logging crews who rode in on the railroads for the weekend. Boarding houses had always served a more stable population of skilled workers, clerks, and trades people who worked in town. Due to the new health regulations both the large workers hotels and the informal boarding houses of the past would soon be replaced by apartment buildings while larger boarding houses would often be converted to apartments. Mrs. McGrath had moved to the home of her married daughter and had left the management to another woman. Mrs. Alice White had arrived in Eureka, from New York with her husband around 1890 but was a widow at the time she had purchased the boarding house. She ran it by herself until 1916, when it was sold and became a private residence for the next decade (Guerra 2012; Western Directory Company 1924).

By 1930, the McGrath Boarding House, received its last building addition, and

soon reopened as the Marine Apartments under the management of one of the long time boarders. Steve Otasevich, a Croatian immigrant, was a middle aged unmarried man and had worked as a foreman in one of local mills. Within a few years several other Croatian immigrants had moved into the Apartments. Reconstruction after WWII would generate a great demand for wood products along with an influx of new workers to meet the demand for skilled labor, and also create another local housing shortage. The current property owner explained that most of his tenants have lived in the apartments for many years and several are now retired (R.L. Polk & Company 1928; R.L. Polk & Company 1940; R.L. Polk & Company 1956; Sanborn Map & Publishing Company Limited 1920).

The cultural landscape and setting of the McGrath Boarding House reflects the creation and growth of the town, the land use patterns of the 19th century, and provides an insight into the worker community. At one time these boarding houses, residential hotels, and apartments were as common in waterfront lumbering communities on the Pacific coast as the mills, warehouses, wharves and shops. While their tenants were usually single working men, and the facilities were often located in marginal neighborhoods, boarding houses provided respectable employment for women during an era when there were few other options open. Until their housing conditions improved, single working men in the lumber industry were often housed in poor conditions whether in the field camps or left to their own resources in mill towns. Boarding houses provided a stable living situation for both working men and women. For single women with children they would also have provided the opportunity to keep the family together in a

reasonably domestic setting.

The building known as the McGrath Boarding House/Marine Apartments was determined to be historically significant as one of the earliest boarding houses on Humboldt Bay, possibly one of the longest in continuous operation in California, and one of the last remaining properties of its type from this era in Eureka. The cultural landscape remained largely unchanged for 150 years. Only recently have redevelopment projects on the adjacent tidelands resulted in new recreation facilities and trails, the removal of original railroad tracks, shops and warehouses, and the paving of the last section of First Street on the tidelands below the building.

The McGrath Boarding House is a vernacular building set into a vernacular landscape, both were created over time by the users with no formal plan or design. The original landscape has been altered through continuous use since the Settlement Period (1850-1885) but it has remained primarily a working waterfront. A summary of findings is included in Table 3. The map in Figure 6 is a section of a Sanborn Fire Insurance Map for Eureka in 1886 and outlines the historic waterfront and the location of the boarding house on the boundary between residential and industrial development. The aerial photo in Figure 7 provides an overview of the entire building and landscape immediately adjacent to the Boarding House. Figure 8 is a recent photograph of the building and illustrates the proximity to the historic railroad lines on the former tidelands below.

Table 3

An Examination of the McGrath Boarding House as an Example of a Vernacular  
Landscape

PROPERTIES	McGrath Boarding House, Eureka
Historic Theme	
2. Landscape of Settler Colonialism	Gold Rush waterfront development and settlement of Eureka; marginal lands adjacent to Bay
3. Worker Housing	Characteristic property type, Boarding House; female owners/managers
4. Labor Housing & Company Towns	Working class housing, adjacent to work sites on waterfront of mill town-Eureka
Evaluation of Significance	
A. Events, the broad patterns of history	Settlement Period (1850-1885) architecture, prefabricated housing (1852) , boarding house worker housing (1862)
C. Work of merit, significant physical qualities	Early prefabricated building (1852 ) now rare type on Northcoast
Evaluation for Integrity	
1. Location	Original site, bluff above tidelands, railroad lines below
2. Design	Vernacular; early prefabricated building; Italianate and Craftsman additions
3. Setting	Little alteration to building lot, road, rail line; alterations to waterfront due to redevelopment
4. Materials	Materials for construction, maintenance and alterations are original or of the same type
5. Workmanship	Some original, original additions; some new materials
6. Feeling	Historic sense of the past due to setting, neighborhood of period buildings with little non-historic infill
7. Association	Boarding house in continuous use since 1862 in same location, overlooking Bay
Landscape Type	
Vernacular	Tidewater Lumbering Era' industrial; worker
Landscape Characteristics	
Land Use Activities	Residential
Patterns of spatial organization	Street, unfinished road below
Response to natural	Adaptive, only minor ornamental landscaping around

<b>PROPERTIES</b>	<b>McGrath Boarding House, Eureka</b>
environment	building, or to stabilize bluff
Circulation networks	Paths, street
Boundary demarcation	Fence, natural bluff above tidelands
Vegetation and- land use patterns	Early tidewater settlement of Eureka
Buildings, structures, and objects	Original building, three major alterations, two wings added before 1884, one circa 1923
Small scale elements	Railroad tracks; retaining walls
<b>NOTES</b>	
	<p>Building previously listed as contributor to Old Town Historic District-Criterion C-Architecture. Additional finding of individual eligibility under Criterion A-broad patterns of history, cultural landscape of tidelands and early development of Eureka, worker housing, women in settlement era.</p> <p>Tidelands setting altered by redevelopment, trail and road project</p>

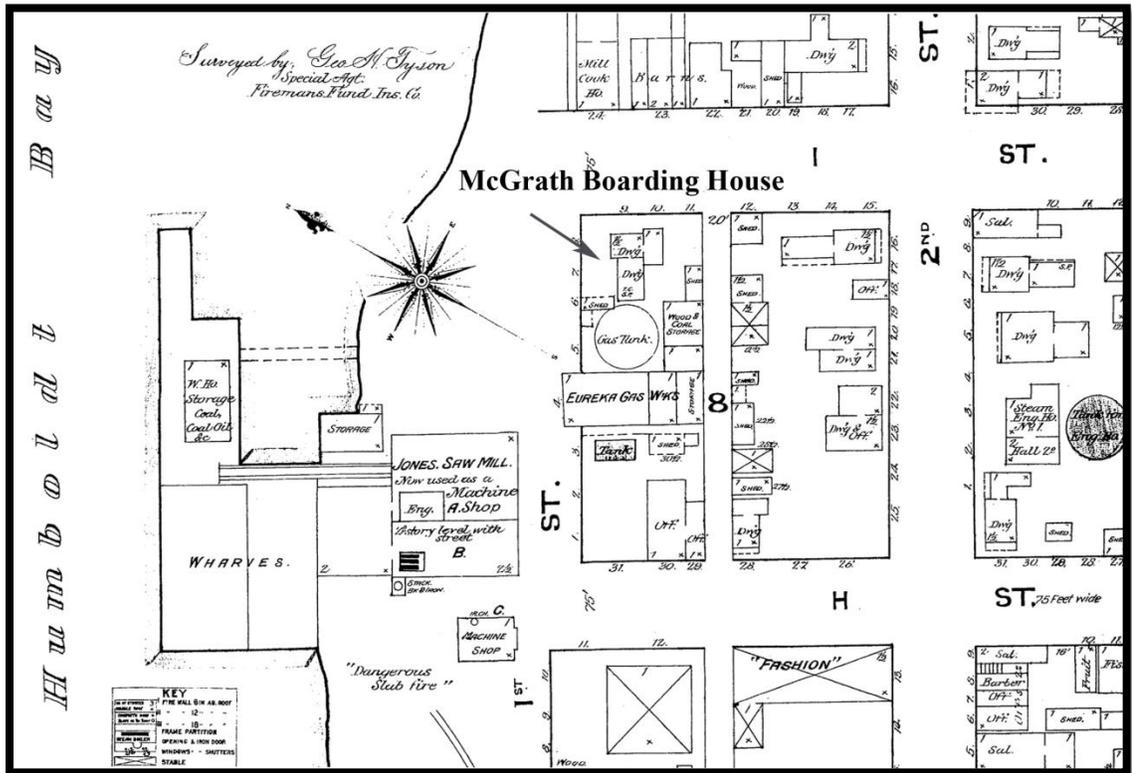


FIGURE 6:

Location map of McGrath Boarding House, Section of Sanborn Map of Eureka 1886

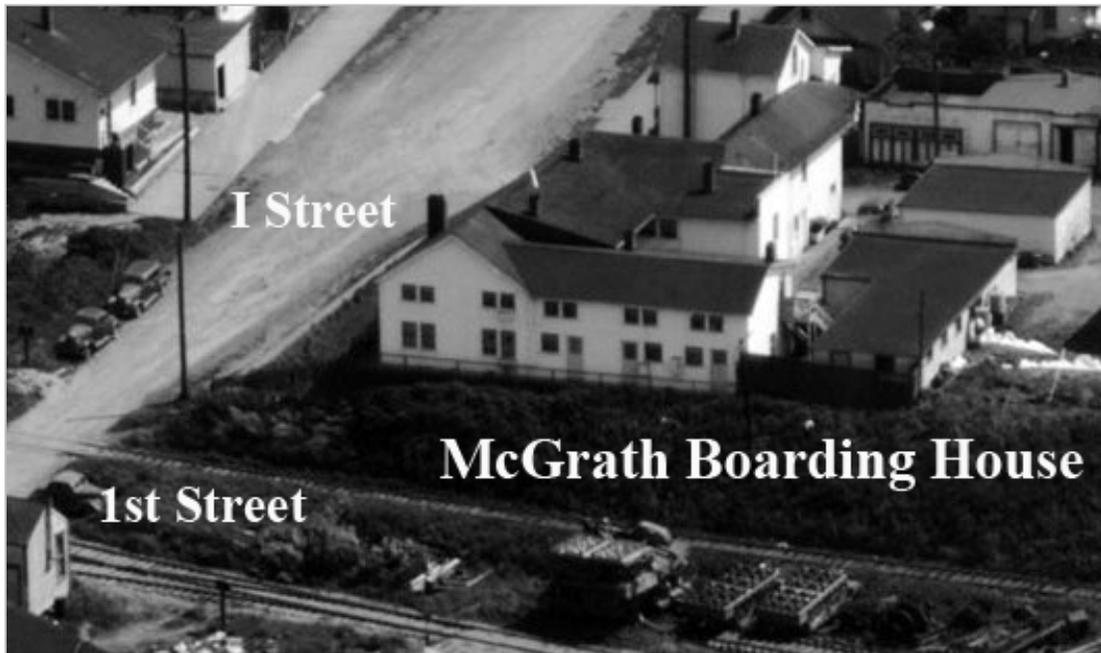


FIGURE 7:

Aerial photo of McGrath Boarding House/Marine Apartments ca 1946. Section of photo courtesy of Merle Shuster Collection, Special Collections, Humboldt State University Library.



FIGURE 8:

McGrath Boarding House/Marine Apartments (Guerra 2013).

### CASE STUDY 3: “LITTLE ITALY” NEIGHBORHOOD & MARGINAL LANDS

In 1921, Charles Dal Porto purchased a small one bedroom house just outside of Arcata for his family in an area which had been logged over earlier . Charles had been born in San Ginese, Lucca, Italy in 1890. In 1902 his parents, Giuseppe and Marie Dal Porto, had immigrated to the United States with their four children, Carlo (Charles), Romeo (Roman), Agustino, and sister Gelsomina. He had married 17 year old Teresa DaMassa, a girl from his hometown, in 1911 and first lived in Fieldbrook where their eldest daughter Hazel was born and where Charles worked in a shingle mill. Their new home at 578 Granite Avenue was only five years old and had been relocated to accommodate the construction of the Redwood Highway, a new permanent two lane highway.

It is difficult to make assumptions about immigrant neighborhoods by looking at the architecture. Most homes in urban areas appear to be constructed in whatever style was popular at that time. A study of the cultural landscape is sometimes useful in revealing relationships and cultural practices. In this case, oral histories with former residents and family members confirmed and contributed to the analysis. This allowed us to establish that, over a forty year period, by sale, exchange or gift of property, the Dal Portos would assemble their extended family into an Italian American neighborhood in what we now refer to as East Arcata (Guerra and Stillman & Associates 2005).

Mr. Dal Porto split the lot on which his home was located when his daughter Lily built her house on the north end of the property. He sold the lower two thirds of the lot adjacent to their home to his brother in law, Lido DaMassa, retaining the portion where his poultry shed was located. At one time, Charles and Teresa Dal Porto lived at 578 Granite Avenue, Teresa's brother Lido DaMassa and family at 570 Granite Avenue and his brother Romeo (Roman) Dal Porto lived across the street at 595 Granite Avenue. Daughter Hazel Bassi and her husband built their bungalow at 480 Granite in the 1930s, while next door was the Brunetto Paoli family. North of them on 24th street lived Charles sister and brother in-law, Peter and Gelsomina Orlandi. Daughter Lily Ghidinelli and husband Mark built their home in 1941, around the corner from her parent's house, at 2376 L.K. Wood Blvd (DaMassa 2005; Ghidinelli 2005).

The area now referred to as East Arcata was not originally within the city limits of Arcata but was a section of Union Township usually referred to as "Stump Town." After the hills above Arcata had been logged to build the town, only a landscape of large stumps remained. This was another type of marginal land once the timber had been removed and since the land was not suitable for farming it had little value. The Preston Place Addition was a new subdivision planned by William A. Preston and R. Foster. It was located in the area directly adjacent to the former L.K. Wood mill, which had been closed after the area was logged and the equipment sold and moved to Trinidad (Carranco 1982). In a fanciful marketing ploy, the subdivision map described a "Trout Pond," located approximately where the old log pond had been located.

Preston began selling off lots in 1907. Located within walking distance from the center of town in the rolling hills east of the railroad line, the area offered affordable lots for the working families who preferred to live within walking distance of town. While streets were laid out they were not paved. There was little construction in the area until 1915, when several blocks were sold to the State of California for the new campus of the State Normal School. The new campus would be completed in 1921. The Normal School had been housed in the former Arcata Grammar School building since it had opened in 1914. The new Redwood Park, site of the City reservoir, was located nearby. Family residences, including faculty housing, would eventually surround the university but the first homes were fairly modest. Commercial development would follow on North G Street and along the Redwood Highway in the next few decades.

In the 1900 federal census, the population of Humboldt County was reported as 27,000 residents. About one quarter of the population was composed of immigrants, with those from Canada and the British Isles accounting for the greatest numbers. These immigrant groups were largely from the same regions as the earliest immigrants to the Humboldt Bay region, and integrated rapidly into the existing communities. As early as 1903-1904, the county press was commenting on the influx of new immigrants from Southern Europe and the Mediterranean. Many of these new arrivals went to work in the woods and mills, especially in southern Humboldt County. The 1910 Census of the Hydesville precinct, which included the Pacific Lumber Company, found that of the 693 lumber workers only 239 were native born. Italians made up 16 percent, with workers

from Scandinavian countries the second largest group, followed by Austrians. Only 14 percent were naturalized or had filed citizenship papers (Cornford 1983; Cornford 1987).

The greater ethnic diversity of the workforce was characteristic of the California lumber industry as a whole. According to reports of labor organizers as well as newspapers, Italians constituted 24 percent of the labor force of the Union Lumber Company of Mendocino in 1909. From accounts of the 1909 strike at the McCloud River Lumber Company in Siskiyou County, about half of their workers were Italian. In 1911, International Workers of the World labor organizers claimed that 60 percent of the Mendocino lumber workers were Italian (Cornford: 1987).

Language and cultural barriers proved a major disincentive to assimilation and citizenship, and it is not surprising that an estimated 60 percent of Italian immigrants to the United States during this period eventually returned to Italy (Cornford: 1987). By 1910, the California Bureau of Labor Statistics in a report on the lumber industry stated that at least one employer had freely admitted to investigators that the labor force was mixed to inhibit labor organization. Many immigrants did not join unions because of prejudice within and outside the labor movement. Although immigrant groups were often divided by class, language barriers were also an obstacle. While the majority spoke some English, a sizeable proportion of Italian lumber workers in Southern Humboldt County in 1910 (38%) were not bilingual (Cornford 1987; Mann 2002).

During the Gold Rush the first wave of Italian immigrants had come primarily from the industrial northern region and had settled primarily in urbanized areas. From 1880 through 1930, southern Italians arrived during a time of economic depression in both Italy and America, and a period of labor unrest. Lured by low steamship fares and promises of jobs and land, some were recruited for lumber industry jobs in the west with the added inducement of a paid railroad ticket and company- provided room and board (Cornford 1983; Gumina 1978). The second wave of immigrants had included more families, intending to settle permanently in the new country (Balan 1983; Coohill 1987). While increasingly integrated into the local community, Italian Americans and Italian resident aliens made an effort to maintain many of their cultural traditions and to preserve family ties (Coohill 1987; Hoover 2003).

Workers from southern Europe often faced the prejudices of Americans, as well as earlier immigrants. Institutions such as fraternal lodges, churches and the establishment of ethnic neighborhoods could ease the transition by helping to maintain the familiar culture of the Old World (Cornford 1983). Italian newspapers from the San Francisco Bay area, such as *Il Voce del Popolo* provided news of the old country, Italian American communities in California, and interpretation of national issues that affected immigrant communities (Coohill 1987; Hoover 2003). By 1936, the Eureka based Latin-American Publishing Co. was publishing the Italian language newspaper, *Il Giornale D'Italia*, and the Portuguese *Luz da Colonia*, with English versions under the title *Northern California Democrat*. The paper included ads in both English and Italian from a

number of businesses within the region (“Italians in Humboldt County” Various). In 1940, the Italian Swiss News was a bi-monthly publication published by the Arcata Union (Coohill 1987; R.L. Polk & Company 1940).

The first lodge of Order Sons of Italy in this state, “Loggia Cristoforo Colombo,” was founded in 1922, in Fresno, California, while the next three lodges were founded in 1924 in regions well known as centers of the lumber industry. This includes the "Cuori Uniti" No. 1269, in the lumber company town of Weed; the "Nobile Pensiero" No. 1275, of McCloud, the company town of McCloud Lumber Company, and the "Eureka" No. 1274 in Eureka (Order of the Sons of Italy in America 2014).

In Eureka the area around Clark Street was known as “Little Italy” with many families living between Fourth Street and the waterfront. About fifty Italian families lived within several blocks of each other, and some families provided temporary housing for new arrivals. In the company town of Scotia, fourteen of the nineteen houses on one block were occupied by Italian families, A large population resided in neighboring Rio Dell, where company restrictions did not apply and workers could buy their property. In Arcata, “Little Italy” was located around G Street and the Redwood Highway, East of the Normal School, with a number of businesses and homes in the area known later as Northtown (Coohill 1987).

As noted by many observers at that time, Italian families often grew gardens or kept animals to reduce food expenditures, purchased from peddlers, and temporarily

housed newcomers until they were settled (Coohill 1987; Hoover 2003; Roman 1993). Like other immigrant families, residents of this neighborhood developed extensive gardens and constructed outbuildings for the poultry and rabbits that supplemented their diet. This was not simply an issue of preference; it was also a strategy for recreating the home place-the familiar cultural landscape and community of home. Only 20 years ago, the Smithsonian Folklife Center study on Italian Americans in the West provided substantial documentation that food traditions play an important role in Italian-American identity, with community-based sacred and secular festivals that disclose the continuity and change of old- world traditions. Informal family spaces such kitchens and landscapes such as gardens, orchards and yards display and help to sustain family history and values (Carter 1995).

At that time Americans usually considered ethnic food preferences as unhealthy and made an effort to instruct new immigrants in what they considered a healthy diet in Americanization programs. Outside of larger urban centers, ethnic foods were not likely to be found in restaurants, and never in the local cookhouse. It was not possible to obtain many of the staples of the familiar Italian diet in grocery stores. This made it difficult to prepare the traditional dishes associated with cultural events, or to obtain herbs used for cooking and home remedies. Just as they would have done in their homeland, these families grew, shared and prepared many of these necessities themselves.

Most of the homes owned by this extended family were closely adjacent, on sunny south sloping lots. Adjoining side and back yards were terraced with concrete or

board retaining walls, fruit trees were planted in back and ornamentals near the front. The Orlandi house, above the DaMassa properties on 24<sup>th</sup> Street, had a small orchard. Two large outbuildings constructed during this earlier period near 24th street, on the DaMassa and the Dal Porto properties, had been divided into sections for a poultry coop and a rabbit hutch. While board fences sometimes separated their yards it was understood that the products of their labors would be shared (Floyd DaMassa 2005; Lily Ghidinelli 2005). At that time, the area adjacent to Redwood Highway, was one of two neighborhoods identified with Italians in Arcata; the other was located on South G Street (Cohill: 1987). Daughter Lily Ghidinelli and nephew Floyd DaMassa recalled that the entire neighborhood was Italian and everyone referred to it as “Little Italy.” One of the best known Italian restaurants in the region, the Big 4, was located on the Redwood Highway at the end of Granite Avenue. At that time North G Street began to be known as Northtown, and was becoming a prosperous commercial district with many Italian owned shops and services (DaMassa 2005; Ghidinelli 2005).

Charles, and brothers Roman and Agostino, and Daughters Hazel and Lily were all employed at one time or another by the California Barrel Company (CABCO), the largest employer in Arcata from 1903 to 1956 (R.L. Polk & Company 1940; United States Bureau of the Census 1930) CABCO was the only plant that cut and milled its own lumber supplying boxes, baskets and veneer for agricultural producers, fish boxes for canneries, petroleum barrels and shipping containers as far as Asia. Charles continued to work at the Barrel Company until it closed in 1956.. In 1940, Teresa Dal Porto was

employed at Arcata Laundry and by 1956 was a laundry worker at Trinity Hospital in Arcata (Ghidinelli 2005).

The younger generation soon moved into other occupations in the Italian American business district that was growing in adjacent Northtown. Nephew Nelo Joseph, son of Agostino Dal Porto, was a clerk at the Papini Brothers grocery and his wife was a clerk at Hutchins Market. Brunetto and Fred Papini had opened a grocery store that served the neighborhood around the Normal School. When CABCO closed permanently in 1956 local jobs had become scarce. That same year Lily and husband Matt Ghidinelli, who had also worked at CABCO, purchased the Northtown 5 & 10 from her cousin Nelo Dal Porto. During the 1930s Dal Porto had acquired the former site of the L.K Wood mill and ran a small shingle mill there until the property was acquired for the construction of the Jolly Giant Housing complex at Humboldt State University in 1960

The greatest impact to the neighborhood was the result of two decades of highway construction and the expansion of student housing at Humboldt State University. During the 1950s, the State of California acquired the block west of the Dal Porto properties to expand the highway.. In 1971, the State of California acquired additional property on the western edge for new freeway construction . By 1980, the only remnant of the original family holdings was the DaMassa property at 570 Granite Avenue. New dormitories were being added and more land was required for parking. In 2005, the family properties had all been sold and the remaining lots in the neighborhood were soon converted to multiple dwellings or student housing. The Da Massa house has since been demolished.

Charles Dal Porto had facilitated the growth of this working class neighborhood by acquiring, selling, lot splits, gifting and exchanging various properties to other members of the extended family. Friends purchased lots in the same neighborhood, and through family ties and mutual support they had managed to recreate the sense of place and cultural landscape of their homeland. These relationships were also reflected in the cultural landscape though they were not obvious by looking at individual homes. While we may note the various ethnic fraternal halls and lodges to be found in the region, or the names of old establishments like the Bella Vista or the Angelina, there still remains much to learn about these worker neighborhoods and the people who created them. (Guerra and Stillman & Associates 2005)

The “Little Italy” neighborhood of Arcata is a vernacular landscape created over time by the residents, primarily members of the same extended family, as they arrived and established their own households. This area had been extensively logged prior to the establishment of the residential neighborhood and there were no signs of Indigenous habitation and culture. A summary of these findings is included in Table 4. A property map of the neighborhood in 1945, prior to the expansion of Humboldt State University and the State Highway, indicates the location of all of the homes of members of the Dal Porto extended family. Figure 10 is a segment of an aerial photograph of the neighborhood taken around 1951 which closely matches the property map and illustrates the configuration of the homes and outbuildings, and the use of the landscape.

Table 4: Examination of the “Little Italy” Neighborhood as a Vernacular Landscape

PROPERTIES	“Little Italy” Neighborhood, Arcata
Historic Theme	
Indigenous & Cultural Landscape	Surviving remnant of Italian immigrant neighborhood “Little Italy;” extended family
Worker Housing	Immigrant ethnic neighborhood, some owner built housing
Labor Housing & Company Towns	Working class neighborhood of small home owners on marginal land.
Evaluation of Significance	
A. Events, the broad patterns of history	Individual & Contributing Resources, Immigration; “Little Italy” neighborhood in Arcata
C. Work of merit, significant physical qualities	Representative examples of working class Craftsman Bungalow style; significant alterations
Evaluation for Integrity	
1. Location	Original site, street has been cut back for freeway construction so one house is now on a corner
2. Design	Vernacular interpretation of Craftsman, one with major alterations
3. Setting	Yards still retain old outbuildings, fruit tree, fencing, adjacent properties buildings and landscape intact
4. Materials	One recently altered, new material.
5. Workmanship	One original, compatible additions; one greatly altered
6. Feeling	Neighborhood greatly altered; remaining properties at rear and adjacent reflect original landscape of neighborhood.
7. Association	A small group of bungalows in a cohesive neighborhood
Landscape Type	
Vernacular	Italian immigrant neighborhood
Landscape Characteristics	
Land Use Activities	Residential, extensive gardening, small animals at one time
Patterns of spatial organization	Residential; adjacent property shared yards, gardens, outbuildings
Response to natural environment	Hillside buildings, raised foundations in front; retaining walls for terraced gardens
Cultural traditions	Italian immigrant subsistence food production, shared use of space, closely adjacent homes
Circulation networks	Overgrown paths; street
Boundary demarcation	Fence , retaining walls
Vegetation and- land use patterns	Recreated ethnic landscape, subsistence; small orchard fruit trees, grape vines, garden space
Buildings, structures, and	Residential Outbuildings; subsistence ag. animal pens,

<b>PROPERTIES</b>	"Little Italy" Neighborhood, Arcata
objects	coops.
Clusters, groupings	Outbuildings, garden terraces, animal pens, coop
Small scale elements	Retaining walls, terraced garden area
<b>NOTES</b>	
	Recommendation for landscape of an Italian immigrant neighborhood. Properties remodeled or demolished.

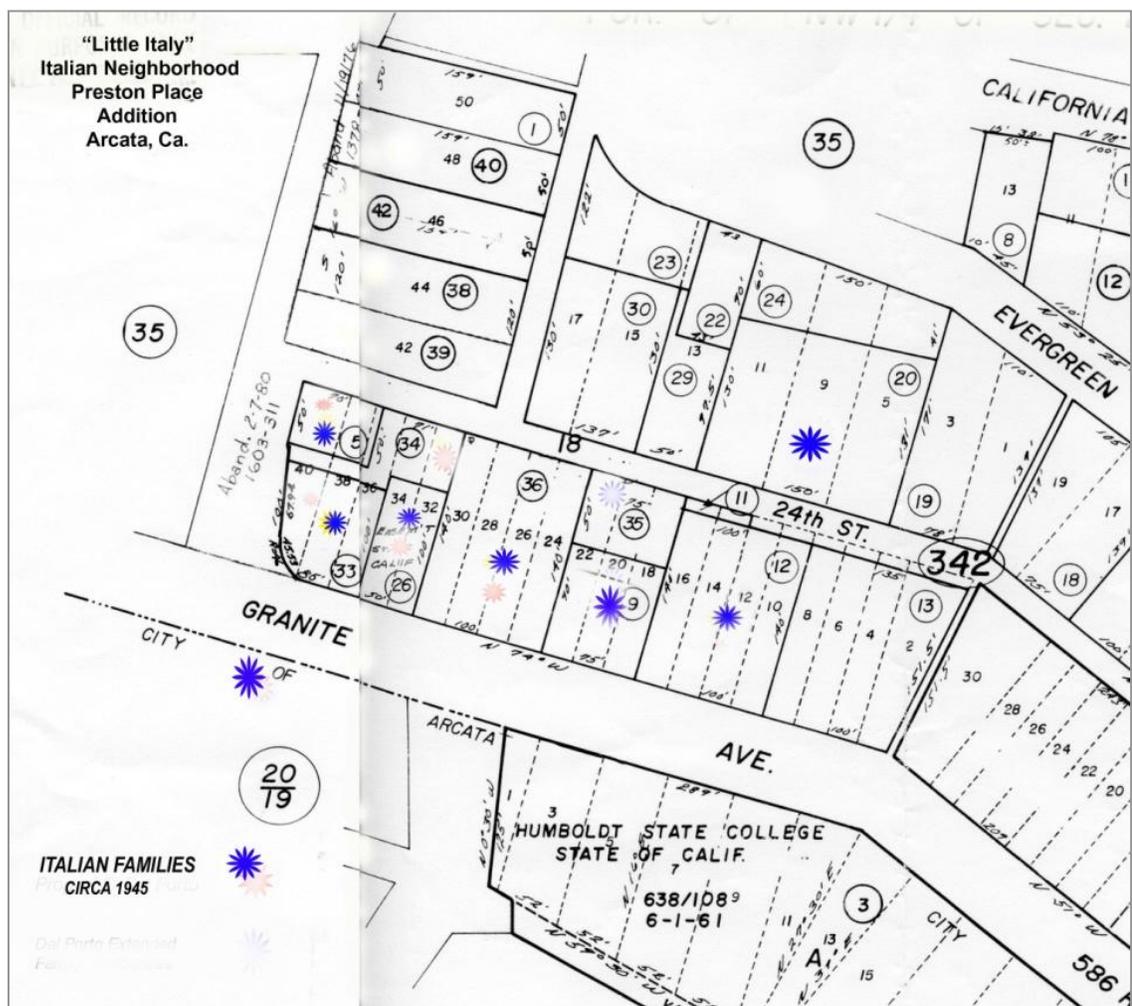


FIGURE 9:  
 Map of Granite Avenue Italian immigrant neighborhood in Arcata in 1945, known as  
 “Little Italy”.

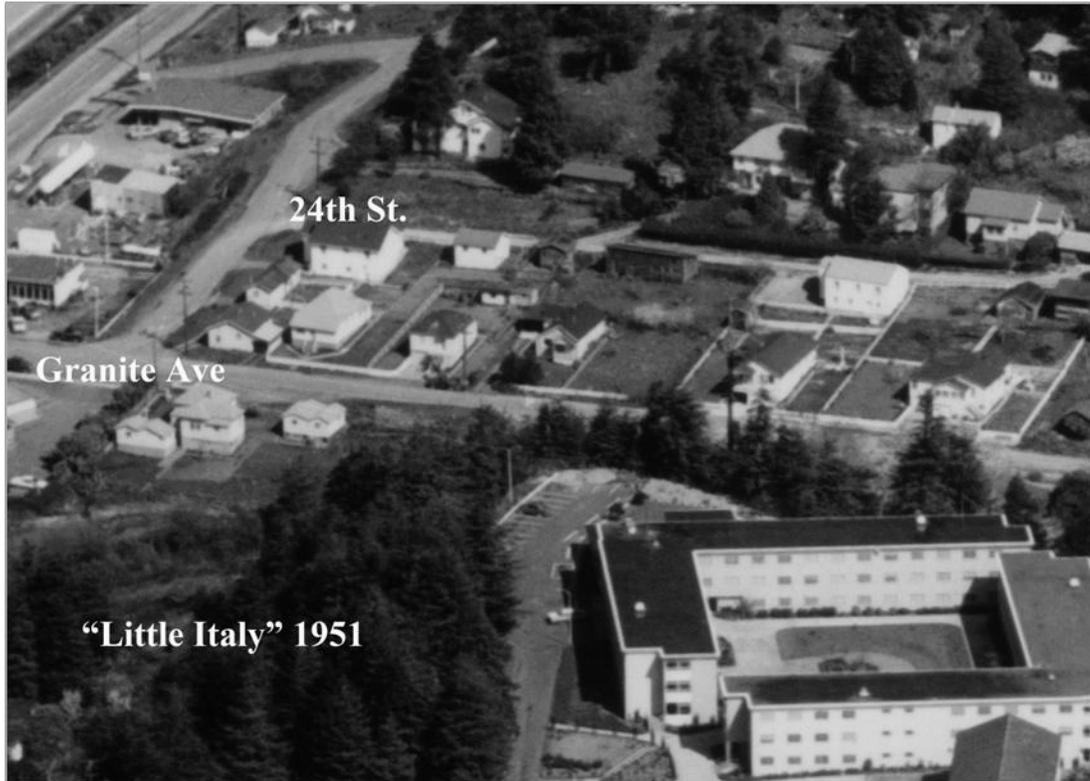


FIGURE 10

Aerial photo of Granite Avenue and 24<sup>th</sup> Street, viewed from south east, illustrating use of landscape, outbuildings, configuration of yards, layout of garden spaces (1951).

Edited section of photograph from the Shuster Collection, courtesy of Special Collections, Humboldt State University Library

## CHAPTER V: CONCLUSION

This study is an introduction to the concept of cultural landscapes in Humboldt County. The case studies that have been included reveal some of the insights we may gain into the historical relationships between peoples and the various ways in which we inhabit the environment. Working at the State Office of Historic Preservation, I learned that the purpose of historic preservation is to encourage the public to integrate the past with the present and the future. By emphasizing the totality of human experience in a community it would provide a sense of identity for every member.

We live in a region that has been shaped by successive waves of resource extraction industries and land use policies that imposed the settler colonial system. The first was gold mining; then commercial fishing and canning; and we are entering the end of lumbering with the last of the redwood forests. While one popular approach is to refer to the history of the region as our “Timber Heritage,” I think it is simplistic and dangerous to reduce our history and identity to that of a commodity. The commodification of natural resources should not be the only value that we consider as historically significant. The Northcoast is a complex cultural landscape shaped by the people who have lived here and whose cultures have also been shaped by engaging with the environment. Referencing the Northcoast only by its major industry is dangerous because it perpetuates the values that led to the commodification of land and natural resources, which we now understand has been so damaging to the environment. It also

limits our understanding of history by perpetuating the same founding myths that have marginalized the stories of those workers or people who were not the titans of industry and were considered to be “outsiders” at that time.

The landscape reveals multiple meanings and, despite laws which establish standards and guidelines with which to evaluate them, our assignment of historical significance is based on cultural perspectives and power relationships. Landscapes are constantly evolving and changing so, unlike individual buildings, strategies for preserving, interpreting and documenting them must include an understanding of the cultural conditions that gave rise to that landscape. These cultural perspectives and contested layers of meaning may not be readily apparent. For this reason, there is also an increasing emphasis on incorporating oral history research and the retrieval of archival materials from community members (Greider and Garkovich 1994; Longstreth 2008; Sullivan, Chambers, and Barberly 2013).

Then whose history are we telling? If we are serious about the importance of a more inclusive history then we must revise the federal standards guidelines to remove the bias in the law and in standards and guidelines that favor buildings and architectural integrity over other values. There are many other landscapes on the Northcoast that have not been documented; marginal lands and satellite communities such as Rio Dell and Manila provided alternative spaces of home, work, cultural and recreational activities. In my personal experience, the most common objections to documenting these types of vernacular or every day types are that they are “ordinary,” “ugly,” “shabby,” “too old,”

and therefore they can't be historically significant. Any association with "marginal" populations does not weigh in their favor either.

This thesis examines the cultural landscapes of three characteristic worker neighborhoods and housing types found in Northcoast lumber communities, including marginal populations. The company town of Samoa is a designed landscape, a planned industrial community created by the Hammond Lumber Company at the turn of the 20<sup>th</sup> Century. Of the three examples, this was the most intact cultural landscape at the time of this study and has attracted public curiosity because of its association with the romanticized history of the early lumber industry. The presence of a substantial part of the industrial operation, which was an integral part of the site, would have made this an outstanding example of the industrial landscape. Fortunately, a substantial part of the archival record on this company has survived and is now accessible at to researchers ("LP/Hammond Samoa Collection" 1873). As one of the last two intact lumber company towns in California, its role as a worker community still remains to be documented. The town and industrial mill operation at Scotia are now the last example of this cultural landscape on the Northcoast.

The McGrath Boarding House is a very early building set in a vernacular landscape in one of the oldest sections of Eureka and has been listed as a contributor to the Old Town Historic District in Eureka for its architecture (Stanton 1990; Architectural Resources Group 1987). As an individual property it would be eligible for listing due to its history and setting in a cultural landscape that recalls the Gold Rush origins of Eureka.

In appearance, this is a fairly nondescript building with few remnants of architectural detail. The cultural landscape and setting are the outstanding features that set this property apart and underscore its relationship to local history. It is located in Eureka on the boundary between the first major residential development and the industrial waterfront. Railroad tracks are still visible below the bluff, and only recently has this section of I and First Street been paved. Large residential hotels were investigated at the time the National Register nomination was developed. The role of the worker boarding house and of the many female boarding house owners and managers, most of who appeared to be either widowed or divorced, is an area that had not previously been investigated.

The “Little Italy” Neighborhood demonstrated the highest number of characteristic elements as a cultural landscape. A previous study of the houses in this section of town had focused on the identification of examples of the bungalow form of architecture. At the time of the study was conducted for the report, work was already underway on the redevelopment project, so the neighborhood was being documented as it was being altered. Only the Dal Porto House, because of its architecture, had previously been considered eligible for listing as a local historic resource. The characteristics that made the neighborhood significant as an ethnic cultural resource were identified by a field investigation of the site and confirmed and further refined by oral history interviews of some of the family members who had lived there. It would not have been possible to document the history of an ethnic neighborhood simply by examining the architecture of

the houses. Homes in this neighborhood were quite similar in general appearance to those in other areas of town. While the outbuildings were old and deteriorated and the garden landscape overgrown, it was very clear that the yards surrounding most buildings had been intensively utilized. The oral histories confirmed that this was for subsistence and not ornamental, for the production of cultural foods and medicinal plants that they could not obtain elsewhere. The recommendation for a further study of the neighborhood as a potential historic district of immigrant workers was not realized. The buildings and structures in this area have been largely converted to student housing and much of the original landscape is now gone.

Cultural landscapes, as a category of historical resource and as an interdisciplinary tool of analysis, provide a more comprehensive method of assessing historical resources as Places. Buildings, structures and objects, sites and landscapes, the recognized categories of historical resources, are all identified with specific locales-Places. For the Northcoast, this means that our land use planning documents and practices should recognize that cultural landscapes may apply to any category or type of resource. The exteriors of buildings and structures do not typically exhibit the ethnicity, gender or culture of the builders or the users. As with the Dal Porto House, it is only when we are able to study the broader context of the landscape that we can understand the cultural and historical significance of this neighborhood as a Place that embodies immigrant cultural practices, identity, and family life.

In practical terms, the documentation, interpretation, and preservation of historical resources all take place in a political context because historical resources are codified as real estate. Property rights advocates often take the lead in opposing the recognition of historical resources. They fear government interference in zoning and land-use, laws that are overly prescriptive in regulating details of private property use (e.g., the species of trees that landowners can plant), and laws that inherently reduce property values. Certainly preservationists have opposed the demolition of buildings, structures and neighborhoods, which opponents view as necessary in order to the community rid of slums and blight. The term “blight”, however, is another culturally created category that has been applied politically in many cases (Rypkema 2012; Vincent and Whiteman 2009). On the Northcoast, cultural resources studies are typically triggered by CEQA and are conducted on individual properties. Even when several properties are involved, the tendency is to segment the study so the emphasis remains on the individual building or structure and does not include the broader context of the cultural landscape.

Cultural landscapes are classified for historic preservation purposes as historic districts or groups of resources that share an association or context, whether it is a mining site, a sacred site, a farmstead or an archaeological site. The difficulty has been that a cultural landscape is made up of many cultural layers interacting at different scales, so these landscapes are not fixed in time but in a constant state of change. For example, if we are considering agriculture landscapes then we would expect some changes due to the

natural cycles of the seasons. When we factor in broader changes-in agricultural technology, labor, weather patterns, different crops or products, markets, etc., we can understand that the form of agriculture itself may change several times before the land goes out of production. Landscapes may also be contested by various groups for ownership of the stories found in the landscape so that issues of class, gender, and ethnicity also demand accurate and equitable representation in the historic record. A school or park may serve several generations of community members but the composition of the community, the languages and cultural practices, the neighborhood, and the uses of the buildings and grounds may be different over time.

The demographic transformation of communities has caused some complications in identifying ethnic and minority cultural resources since the two most important issues to consider in determining eligibility for the National Register are "significance" and "integrity." We may then ask, "To who is this cultural landscape significant-and for what reason?" Integrity is equated with how well a resource is fixed in time. This means that the property must retain enough of its historic physical character (or in the case of archaeological sites, intact archaeological features) to adequately represent its historic period and associations (*How to Apply the National Register Criteria for Evaluation, National Register of Historic Places* 1990; Sluyter 2001b). Under a settler colonial system, the absence of characteristic Western land use practices has frequently been taken as a lack of ability of the indigenous inhabitants to establish sound land use

practices-and a confirmation that the land is “unused” and therefore wasted. Historian Raymond W. Rast points out that underlying these questions is the concern that:

...the fundamental *methods* of the preservation movement continue to spring from—and tend to contribute to—the designation and protection of properties (mostly old buildings) associated with prominent, white, male architects and their wealthy clients, just as they did for most of the 20th century. The goals of the preservation movement have evolved. The methods, for the most part, have not (Rast 2014, p.20).

Vince Michael, Director of the Global Heritage Fund, related that efforts to recognize more diverse resources and different histories in 1993 in Chicago were limited by preservation standards such as “integrity” and practices that focused on architectural design, which have not changed. In particular the concept of “integrity” is determined architecturally even if the resource is significant for other reasons (Michael 2014). The “period of significance” is usually defined by the initial design and construction of the property and may not make sense in a cultural landscape, such as the dykes and levees found on the Northcoast on which the continued use of farmlands have depended for over 100 years.

Projects that may have a significant adverse effect on cultural resources are required to have a study or assessment of impact according to the California Environmental Quality Act (CEQA). Lead agencies for these studies are the local governments or primary jurisdiction under which the property falls, usually a city or county. The study area is determined by the Area of Potential Effect or APE which

identifies the scope of any potential impact due to the project (“Determining the Significance of Impacts to Archeological and Historical Resources” 2014) This practice tends to limit the consideration of cultural landscapes, most of which are historic districts or groups of related resources. The great majority of historical resources studies on the Northcoast document examples of exemplary architecture, sites identified with the “pioneers” and leaders of industry, as individual buildings and structures.

As a result we learn a lot about one particular dairy or industrial site but we may not be able to place these cultural resources into a broader context or identify their relationship to similar sites in the region. In part this is due to the underlying emphasis on documenting only individual resources in order to avoid delaying a project for the property owner rather than the reluctance of the scholar to identify a broader context and significance. Most cultural resources studies are triggered by discretionary projects, those which fall outside of the standard permitting process, and are sometimes conducted when a project is nearly underway.

Some communities lack the technical resources to conduct major cultural resource study projects and rely on outside expertise, which can be costly. This is not true on the Northcoast, where several major studies have been conducted by local based multidisciplinary teams such as *A Cultural Resources Investigation of the Salt River Ecosystem Restoration Project Located near Ferndale, Humboldt County, California* (James Roscoe et al. 2008). Tribes throughout California now include Tribal Historic

Preservation Officers on their staff (California State Office of Historic Preservation 2014b).

It is not really feasible to preserve every site that is considered historically significant; however, it is possible to do a better job of identifying them and of documenting their history. One approach recommended by the California State Office of Historic Preservation is to institute systematic studies of historical resources as a land use planning practice. The resulting historical resources inventories identify both historic and non-historic properties are conducted within a specific region or neighborhood. As a result, larger resources, industrial sites, agricultural sites, tract housing and cultural landscapes can be more readily identified.

Only a few of these studies have been conducted on the Northcoast, and only in Eureka and Arcata, entirely overlooking potential resources in unincorporated areas unless they are included in a project area (“Historic Contexts & Surveys for Local Planning” 2014). Our cultural bias has been to examine potential resources only from the Western perspective or the dominant history. This became a major obstacle during the planning of the Potawot Health Village in Arcata in 1996. Although formally documented as an archaeological site, it is a cultural landscape that illustrates two layers of history and culture, the original indigenous landscape and land use practices as well as Western agriculture through the farm. One of the major objections to their proposal was that the proposed restoration project was not agriculture according to the Western

definition. Taken from another perspective, the proposal could have been considered a restoration to the original indigenous uses. (United Indian Health Services 2014)

We should also recognize the relationship of the culture to the land in ceremony and in maintaining cultural traditions. As Elena L'Annunziata explained in her recent study of the Hmong Community Garden in Eureka, neighbors complained because the garden appeared "disordered and messy." A closer look revealed that the gardeners were using traditional gardening practices and growing traditional plants used for food, medicine or ritual. While we accept that indigenous populations may continue some cultural traditions for food gathering, growing, and medicinal uses, as we saw in the Italian American neighborhood other immigrants utilize similar practices. Rather than dismiss what does not fit our cultural frame of reference we need to record what is there and then assess it using a broader perspective. (L'Annunziata 2010)

Western cultures assign values to landscapes that may not be those of indigenous populations and usually downplay the importance of non-human agency. Indigenous cultures may define a space by more than the terrain or built environment. As defined historical resources, cultural landscapes are framed within our own biases and assign priority to non-indigenous values. While federal guidelines identify traditional cultural properties and ethnographic landscape as property types, the definitions infer that these apply primarily to Native Americans and archaeological resources. Any authentic cultural landscape, whether Amish, Italian or Karuk, may be experienced differently by different people, and may also change over time while still maintaining traditional values.

Places embody layers of meaning over time and we should also be cautious about presenting cultural landscapes in the context of a single (and past) historic period. It is as important to represent indigenous perspectives in contemporary times as it is to represent them in a past time, or we may be accused of trying to erase their present history just as we did their past (Sullivan, Chambers, and Barbery 2013). Often the period of indigenous occupation of a place is phrased as “pre-history,” implying that historic time began when colonists arrived because an oral tradition could provide no written documentation.

This also implies that there was no longer a relationship between that place and the people. This was specifically addressed at a presentation by Cheryl Seidner, past Tribal Chair of the Table Bluff Wiyot Tribe, speaking on “Cultural Landscapes of the Northcoast-A Wiyot Perspective.” She responded to a non-Indigenous person who referred to the period before Euro-American contact as the end of Indigenous history by saying, “My history never ended. You (pointing to the person) are a part of my history” (Seidner 2012). Bengali historian Dipresh Chakrabarty in his book, *Provincializing Europe: postcolonial thought and historical difference*, argues that history is not a continuous unfolding story played out on a level field—a universal human experience but that humans have different inheritances and memories so we should recognize its plurality (Chakrabarty 2000).

Events always take place in a specific place and time. Our concept of recent history tends to focus on the environmental conflicts of the late 20th century, with the

entire region as the contested landscape. Habitat restoration projects, dam removal, reforestation are also reflections of our view of the landscape of the Northcoast and how we define our relationship with it.

A landscape is never simply a natural space, a feature of the natural environment, and the manmade and natural elements may be significant in many different ways to the people who interact with it, so both cultural and natural elements must be considered together. Landscapes need not be monumental or rare to tell us something about history and society, how we see ourselves and the world. In historic preservation, properties may be assessed for their historical significance when they reach 45 years old, so we are always reminded that history is a moving target (Jackson 1984)

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**APPENDIX A: PRESERVATION BRIEF 36: PROTECTING CULTURAL  
LANDSCAPES: PLANNING, TREATMENT AND MANAGEMENT OF  
HISTORIC LANDSCAPES**

# 36 PRESERVATION BRIEFS

## Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes

Charles A. Birnbaum, ASLA



U.S. Department of the Interior  
National Park Service  
Cultural Resources  
Preservation Assistance



Cultural landscapes can range from thousands of acres of rural tracts of land to a small homestead with a front yard of less than one acre. Like historic buildings and districts, these special places reveal aspects of our country's origins and development through their form and features and the ways they were used. Cultural landscapes also reveal much about our evolving relationship with the natural world.

A *cultural landscape* is defined as "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." There are four general types of cultural landscapes, not mutually exclusive: *historic sites*, *historic designed landscapes*,

*historic vernacular landscapes*, and *ethnographic landscapes*. These are defined on the Table on page 2.<sup>1</sup>

*Historic landscapes* include residential gardens and community parks, scenic highways, rural communities, institutional grounds, cemeteries, battlefields and zoological gardens. They are composed of a number of character-defining features which individually or collectively contribute to the landscape's physical appearance as they have evolved over time. In addition to vegetation and topography, cultural landscapes may include water features such as ponds, streams, and fountains; circulation features such as roads, paths, steps, and walls; buildings; and furnishings, including fences, benches, lights and sculptural objects.



Figure 1: The New York Peace Monument atop Lookout Mountain in the 8,100 acre Chickamauga and Chattanooga National Military Park, Chattanooga, Tennessee, commemorates the reconciliation of the Civil War between the North and South. The strategic high point provides panoramic views to the City of Chattanooga and the Moccasin Bend. Today, it is recognized for its cultural and natural resource value. The memorial, which was added in 1910 is part of this landscape's historic continuum. (courtesy Sam Abell and National Geographic).

## DEFINITIONS

**Historic Designed Landscape** - a landscape that was consciously designed or laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or an amateur gardener working in a recognized style or tradition. The landscape may be associated with a significant person(s), trend, or event in landscape architecture; or illustrate an important development in the theory and practice of landscape architecture. Aesthetic values play a significant role in designed landscapes. Examples include parks, campuses, and estates.

**Historic Vernacular Landscape** - a landscape that evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives. Function plays a significant role in vernacular landscapes. They can be a single property such as a farm or a collection of properties such as a district of historic farms along a river valley. Examples include rural villages, industrial complexes, and agricultural landscapes.

**Historic Site** - a landscape significant for its association with a historic event, activity, or person. Examples include battlefields and president's house properties.

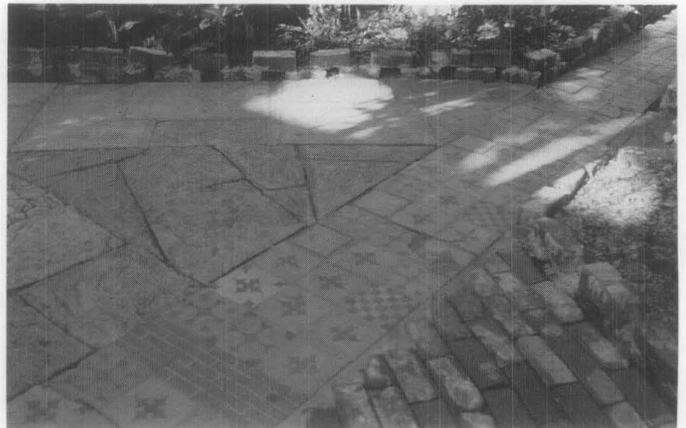
**Ethnographic Landscape** - a landscape containing a variety of natural and cultural resources that associated people define as heritage resources. Examples are contemporary settlements, religious sacred sites and massive geological structures. Small plant communities, animals, subsistence and ceremonial grounds are often components.

Most historic properties have a cultural landscape component that is integral to the significance of the resource. Imagine a residential district without sidewalks, lawns and trees or a plantation with buildings but no adjacent lands. A historic property consists of all its cultural resources — landscapes, buildings, archeological sites and collections. In some cultural landscapes, there may be a total absence of buildings.

This Preservation Brief provides preservation professionals, cultural resource managers, and historic property owners a step-by-step process for preserving historic designed and vernacular landscapes, two types of cultural landscapes. While this process is ideally applied to an entire landscape, it can address a single feature such as a perennial garden, family burial plot, or a sentinel oak in an open meadow. This Brief provides a framework and guidance for undertaking projects to ensure a successful balance between historic preservation and change.

### Developing a Strategy and Seeking Assistance

Nearly all designed and vernacular landscapes evolve from, or are often dependent on, natural resources. It is these interconnected systems of land, air and water,



Figures 2-4: Character-defining landscape features (top to bottom): "Boot Fence" near D. H. Lawrence Ranch, Questa, New Mexico, 1991 (courtesy Cheryl Wagner); paving detail at Ernest Hemingway House National Historic Site, Key West, Florida, 1994 (courtesy author); and, tree planting detail for Jefferson Memorial Park, St. Louis, Missouri (courtesy Office of Dan Kiley)

vegetation and wildlife which have dynamic qualities that differentiate cultural landscapes from other cultural resources, such as historic structures. Thus, their documentation, treatment, and ongoing management require a comprehensive, multi-disciplinary approach.

Today, those involved in preservation planning and management for cultural landscapes represent a broad array of academic backgrounds, training, and related

project experience. Professionals may have expertise in landscape architecture, history, landscape archeology, forestry, agriculture, horticulture, pomology, pollen analysis, planning, architecture, engineering (civil, structural, mechanical, traffic), cultural geography, wildlife, ecology, ethnography, interpretation, material and object conservation, landscape maintenance and management. Historians and historic preservation professionals can bring expertise in the history of the landscape, architecture, art, industry, agriculture, society and other subjects. Landscape preservation teams, including on-site management teams and independent consultants, are often directed by a landscape architect with specific expertise in landscape preservation. It is highly recommended that disciplines relevant to the landscapes' inherent features be represented as well.

Additional guidance may be obtained from State Historic Preservation Offices, local preservation commissions, the National Park Service, local and state park agencies, national and state chapters of the American Society of Landscape Architects, the Alliance for Historic Landscape Preservation, the National Association of Olmsted Parks, and the Catalog of Landscape Records in the United States at Wave Hill among others.<sup>2</sup>

A range of issues may need to be addressed when considering how a particular cultural landscape should be treated. This may include the in-kind replacement of declining vegetation, reproduction of furnishings, rehabilitation of structures, accessibility provisions for people with disabilities, or the treatment of industrial properties that are rehabilitated for new uses.

## Preservation Planning for Cultural Landscapes

Careful planning prior to undertaking work can help prevent irrevocable damage to a cultural landscape. Professional techniques for identifying, documenting, evaluating and preserving cultural landscapes have advanced during the past 25 years and are continually being refined. Preservation planning generally involves the following steps: historical research; inventory and documentation of existing conditions; site analysis and evaluation of integrity and significance; development of a cultural landscape preservation approach and treatment plan; development of a cultural landscape management plan and management philosophy; the development of a strategy for ongoing maintenance; and preparation of a record of treatment and future research recommendations.

The steps in this process are not independent of each other, nor are they always sequential. In fact, information gathered in one step may lead to a re-examination or refinement of previous steps. For example, field inventory and historical research are likely to occur simultaneously, and may reveal unnoticed cultural resources that should be protected.

The treatment and management of cultural landscape should also be considered in concert with the management of an entire historic property. As a result, many other studies may be relevant. They include management plans, interpretive plans, exhibit design, historic structures reports, and other.

## CULTURAL LANDSCAPE REPORTS

A Cultural Landscape Report (CLR) is the primary report that documents the history, significance and treatment of a cultural landscape. A CLR evaluates the history and integrity of the landscape including any changes to its geographical context, features, materials, and use.

CLR's are often prepared when a change (e.g. a new visitor's center or parking area to a landscape) is proposed. In such instances, a CLR can be a useful tool to protect the landscape's character-defining features from undue wear, alteration or loss. A CLR can provide managers, curators and others with information needed to make management decisions.

A CLR will often yield new information about a landscape's historic significance and integrity, even for those already listed on the National Register. Where appropriate, National Register files should be amended to reflect the new findings.

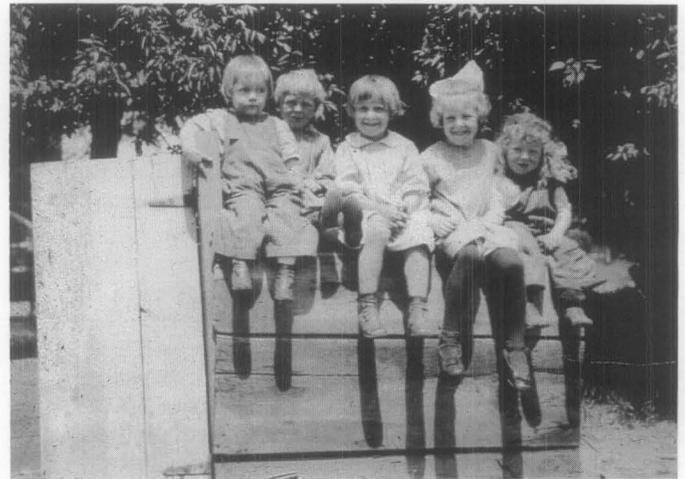
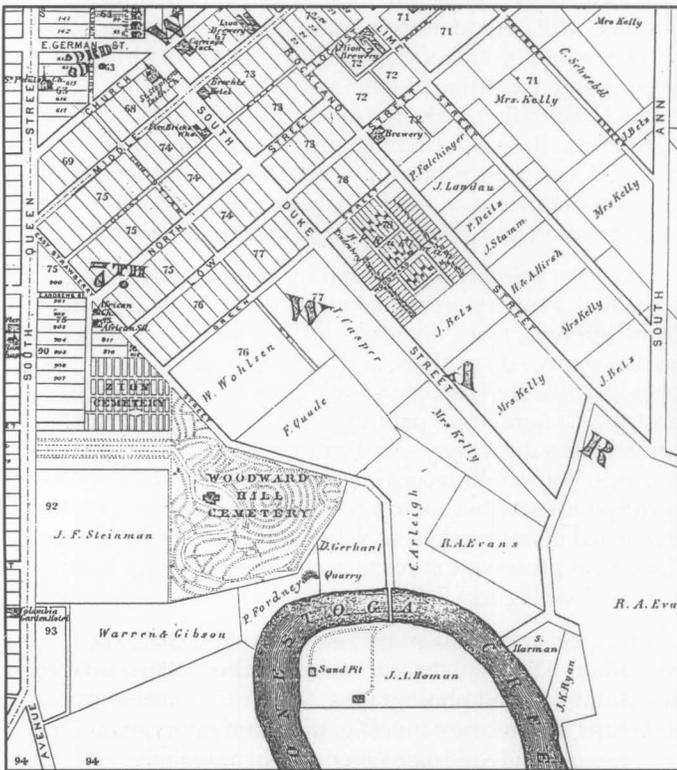
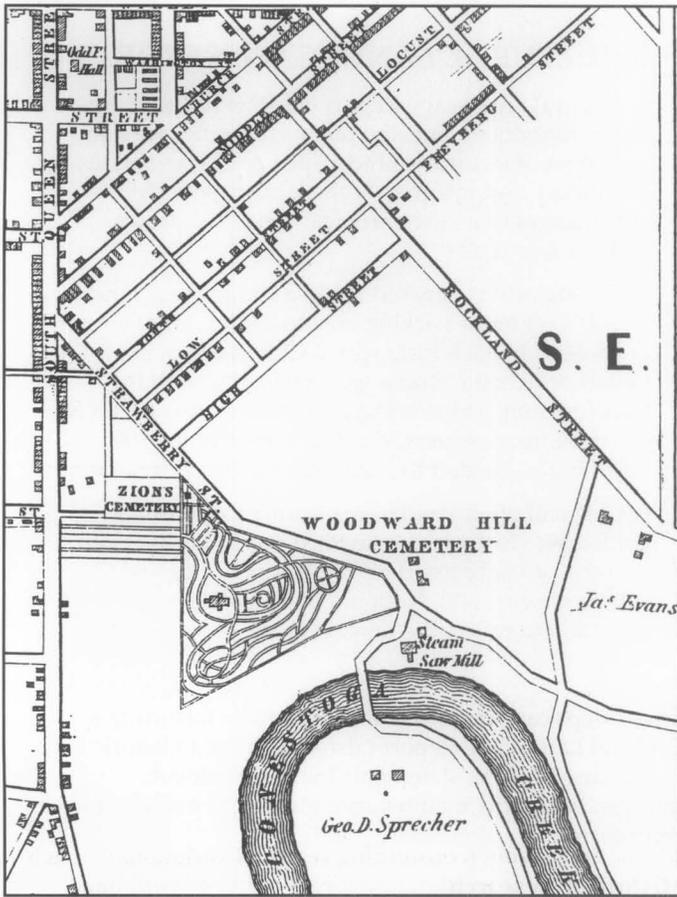
These steps can result in several products including a Cultural Landscape Report (also known as a Historic Landscape Report), statements for management, interpretive guide, maintenance guide and maintenance records.

### Historical Research

Research is essential before undertaking any treatment. Findings will help identify a landscape's historic period(s) of ownership, occupancy and development, and bring greater understanding of the associations and characteristics that make the landscape or history significant. Research findings provide a foundation to make educated decisions for work, and can also facilitate ongoing maintenance and management operations, interpretation and eventual compliance requirements.

A variety of primary and secondary sources may be consulted. Primary archival sources can include historic plans, surveys, plats, tax maps, atlases, U. S. Geological Survey maps, soil profiles, aerial photographs, photographs, stereoscopic views, glass lantern slides, postcards, engravings, paintings, newspapers, journals, construction drawings, specifications, plant lists, nursery catalogs, household records, account books and personal correspondence. Secondary sources include monographs, published histories, theses, National Register forms, survey data, local preservation plans, state contexts and scholarly articles. (See Figures 5-7, page 4.)

Contemporary documentary resources should also be consulted. This may include recent studies, plans, surveys, aerial and infrared photographs, Soil Conservation Service soil maps, inventories, investigations and interviews. Oral histories of residents, managers, and maintenance personnel with a long tenure or historical association can be valuable sources of information about changes to a landscape over many years. (Figures 8-9, page 4) For properties listed in the National Register, nomination forms should be consulted.



Figures 5-7: Atlases and aerial photographs were useful for understanding the evolution of burial grounds in Lancaster County, Pennsylvania. Comparing the plans from the 1864 and 1875 atlases (courtesy Lancaster County Historical Society) with a 1980 aerial photograph (courtesy Lancaster County Planning Commission) revealed the growth and development of Woodward Hill Cemetery and its geographic context for over a century.

Figures 8, 9: Mary Smith Nelson spent her childhood at the Zane Grey family compound in Lackawaxen, Pennsylvania. Recently, her recollections of nearly eighty years ago helped landscape architects to document the evolution of this cultural landscape. These oral memoirs have since been confirmed by archeological and archival findings. (courtesy National Park Service, Zane Grey House Archives and LANDSCAPES)



Figure 10: Traditional land uses are often the key to long term preservation. Therefore, a knowledge of prior landscape management practices is essential as part of the research phase. Land use patterns were often the result of traditional activities such as agriculture, fishing or mining. In Hanalei, Hawaii for example, taro fields are important because they reflect the continuity of use of the land over time. (courtesy Land and Community Associates)

### Preparing Period Plans

In the case of designed landscapes, even though a historic design plan exists, it does not necessarily mean that it was realized fully, or even in part. Based on a review of the archival resources outlined above, and the extant landscape today, an *as-built period plan* may be delineated. For all successive tenures of ownership, occupancy and landscape change, *period plans* should be generated (see Figure 13, page 6). Period plans can document to the greatest extent possible the historic appearance during a particular period of ownership, occupancy, or development. Period plans should be based on primary archival sources and should avoid conjecture. Features that are based on secondary or less accurate sources should be graphically differentiated. Ideally, all referenced archival sources should be annotated and footnoted directly on *period plans*.

Where historical data is missing, period plans should reflect any gaps in the CLR narrative text and these limitations considered in future treatment decisions (See Treatments for Cultural Landscapes on page 13.)

### Inventorying and Documenting Existing Conditions

Both physical evidence in the landscape and historic documentation guide the historic preservation plan and treatments. To document existing conditions, intensive field investigation and reconnaissance should be conducted at the same time that documentary research is being gathered. Information should be exchanged among preservation professionals, historians, technicians, local residents, managers and visitors.

To assist in the survey process, National Register Bulletins have been published by the National Park Service to aid in identifying, nominating and evaluating designed and rural historic landscapes. Additionally, Bulletins are available for specific landscape types such as battlefields, mining sites, and cemeteries.<sup>6</sup>

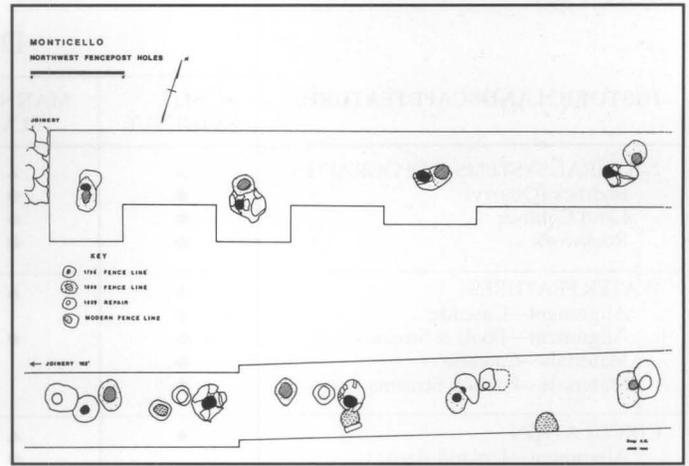


Figure 11: Landscape archeology is an important research tool that can provide location, dating and detail verification for landscape features. At Monticello, the estate of Thomas Jefferson in Charlottesville, Virginia, archeological research has employed both excavational and non-invasive methods. This has included aerial photography, soil resistivity, transect and stratified sampling and photogrammetric recording. As illustrated in the plan above, fence post spacing and alignment can be confirmed with a transect trenching technique.<sup>3</sup> (courtesy Thomas Jefferson Memorial Foundation)

Although there are several ways to inventory and document a landscape, the goal is to create a baseline from a detailed record of the landscape and its features as they exist at the present (considering seasonal variations).<sup>7</sup> Each landscape inventory should address issues of boundary delineation, documentation methodologies and techniques, the limitations of the inventory, and the scope of inventory efforts. These are most often influenced by the timetable, budget, project scope, and the purpose of the inventory and, depending on the physical qualities of the property, its scale, detail, and the interrelationship between natural and cultural resources. For example, inventory objectives to develop a treatment plan may differ considerably compared to those needed to develop an ongoing maintenance plan. Once the criteria for a landscape inventory are developed and tested, the methodology should be explained.

### Preparing Existing Condition Plans

Inventory and documentation may be recorded in plans, sections, photographs, aerial photographs, axonometric perspectives, narratives, video—or any combination of techniques. Existing conditions should generally be documented to scale, drawn by hand or generated by computer. The scale of the drawings is often determined by the size and complexity of the landscape. Some landscapes may require documentation at more than one scale. For example, a large estate may be documented at a small scale to depict its spatial and visual relationships, while the discrete area around an estate mansion may require a larger scale to illustrate individual plant materials, pavement patterns and other details. The same may apply to an entire rural historic district and a fenced vegetable garden contained within. (See Figures 14-15, page 8).

When landscapes are documented in photographs, *registration points* can be set to indicate the precise location and orientation of features. Registration points should correspond to significant forms, features and spatial relationships within the landscape and its surrounds (see

HISTORIC LANDSCAPE FEATURES	DEGREE OF DOCUMENTATION					
	SITE EVIDENCE	MANNING PLAN	HISTORIC PHOTOS	LETTERS 1914-1946	1955-1993 RECORDS	SECONDARY SOURCES
NATURAL SYSTEMS/TOPOGRAPHY Bedrock (Quarry) Land Contour Rockwork	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	?
WATER FEATURES Alignment—Cascade Alignment—Pools & Streams Materials—Cascade Materials—Pools & Streams	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	?
CIRCULATION Alignment—Upland Area Alignment—Perimeter Paths Alignment—Internal Paths Materials—Upland Area Materials—Perimeter Paths Materials—Internal Paths	▲ ● ● ● ●	▲ ● ● ● ●	▲ ● ● ● ●	▲ ● ● ● ●	▲ ● ● ● ●	?
SPATIAL RELATIONSHIPS Garden Site (Quarry) Viewshed (Cuyahoga Valley) Vista over Garden from Terrace Views within Garden Views within Upland Views from Croquet Lawn	▲ ● ● ● ●	▲ ● ● ● ●	▲ ● ● ● ●	▲ ● ● ● ●	▲ ● ● ● ●	?
VEGETATION Native Forest Trees Ornamental Shrubs in Garden Groundcovers in Garden Herbaceous Plants in Garden	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	?
SITE FURNISHINGS Lanterns Seats	▲ ● ●	▲ ● ●	▲ ● ●	▲ ● ●	▲ ● ●	?
STRUCTURES Torii Gate Cistern Stone Wall Concealing Cistern Lagon Bridges Umbrella House Trellis/Lattice	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	▲ ● ● ●	?

Figure 12: This chart measures available documentation for character-defining features in the Japanese Garden at Stan Hywet Hall, Akron, Ohio designed by Warren Manning. Areas with little or no historic documentation are noted, thus identifying areas where future treatment options may be restricted. As illustrated, restoration or reconstruction are viable alternatives based on the rich research findings. (courtesy Stan Hywet Hall Foundation, Inc. and Doell and Doell)



Figure 13: Period plans show the evolution of Aspet, the home of Augustus St. Gaudens, Cornish, New Hampshire. Plans were developed at two scales: first for the entire estate's development, and second for the core area around the house, studio and gardens. For both, plans were generated for five time periods: 1885-1903, 1903-1907, 1907-1926, 1926-1965 and 1965-1992. Illustrated above are the 1885-1903, 1907-1926, and the 1926-1965 plans for the core area. (courtesy National Park Service, North Atlantic Region and Pressley Associates)

## READING THE LANDSCAPE

A noted geographer stated, "The attempt to derive meaning from landscapes possesses overwhelming virtue. It keeps us constantly alert to the world around us, demanding that we pay attention not just to some of the things around us but to all of them—the whole visible world in all of its rich, glorious, messy, confusing, ugly, and beautiful complexity."<sup>4</sup>

Landscapes can be read on many levels—landscape as nature, habitat, artifact, system, problem, wealth, ideology, history, place and aesthetic.<sup>5</sup> When developing a strategy to document a cultural landscape, it is important to attempt to read the landscape in its context of place and time. (See Figures 16-17, page 8)

Reading the landscape, like engaging in archival research, requires a knowledge of the resource and subject area as well as a willingness to be skeptical. As with archival research, it may involve serendipitous discoveries.

Evidence gained from reading the landscape may confirm or contradict other findings and may encourage the observer and the historian to revisit both primary and secondary sources with a fresh outlook. Landscape investigation may also stimulate other forms of research and survey, such as oral histories or archeological investigations, to supplement what appeared on-site.

There are many ways to read a landscape—whatever approach is taken should provide a broad overview. This may be achieved by combining on-the-ground observations with a bird's-eye perspective. To begin this process, aerial photographs should be reviewed to gain an orientation to the landscape and its setting. Aerial photographs come in different sizes and scales, and can thus portray different levels of detail in the landscape. Aerial photographs taken at a high altitude, for example, may help to reveal remnant field patterns or traces of an abandoned circulation system; or, portions of axial relationships that were part of the original design, since obscured by encroaching woodland areas. Low altitude aerial photographs can point out individual features such as the arrangement of shrub and herbaceous borders, and the exact locations of furnishings, lighting, and fence

alignments. This knowledge can prove beneficial before an on-site visit.

Aerial photographs provide clues that can help orient the viewer to the landscape. The next step may be to view the landscape from a high point such as a knoll or an upper floor window. Such a vantage point may provide an excellent transition before physically entering the cultural landscape.

On ground, evidence should then be studied, including character-defining features, visual and spatial relationships. By reviewing supporting materials from historic research, individual features can be understood in a systematic fashion that show the continuum that exists on the ground today. By classifying these features and relationships, the landscape can be understood as an artifact, possessing evidence of evolving natural systems and human interventions over time.

For example, the on-site investigation of an abandoned turn-of-the-century farm complex reveals the remnant of a native oak and pine forest which was cut and burned in the mid-nineteenth century. This previous use is confirmed by a small stand of mature oaks and the presence of these plants in the emerging secondary woodland growth that is overtaking this farm complex in decline. A ring count of the trees can establish a more accurate age. By *reading* other character-defining features—such as the traces of old roads, remnant hedgerows, ornamental trees along boundary roads, foundation plantings, the terracing of grades and remnant fences—the visual, spatial and contextual relationships of the property as it existed a century ago may be understood and its present condition and integrity evaluated.

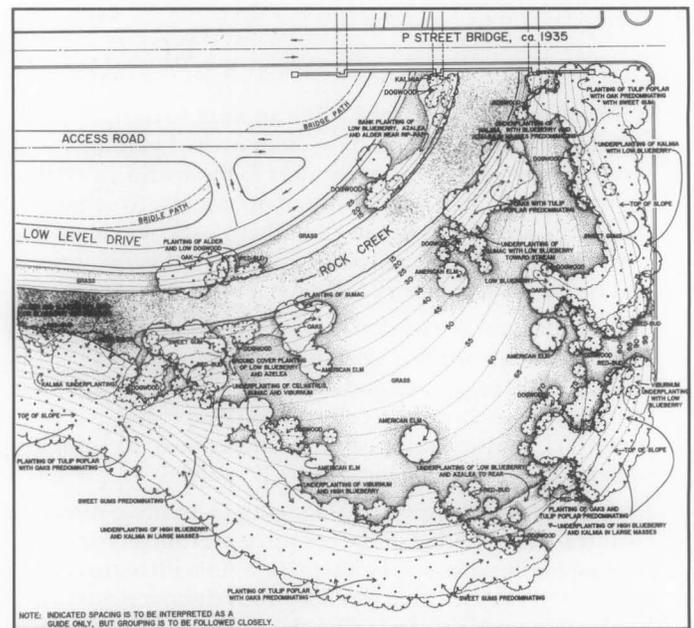
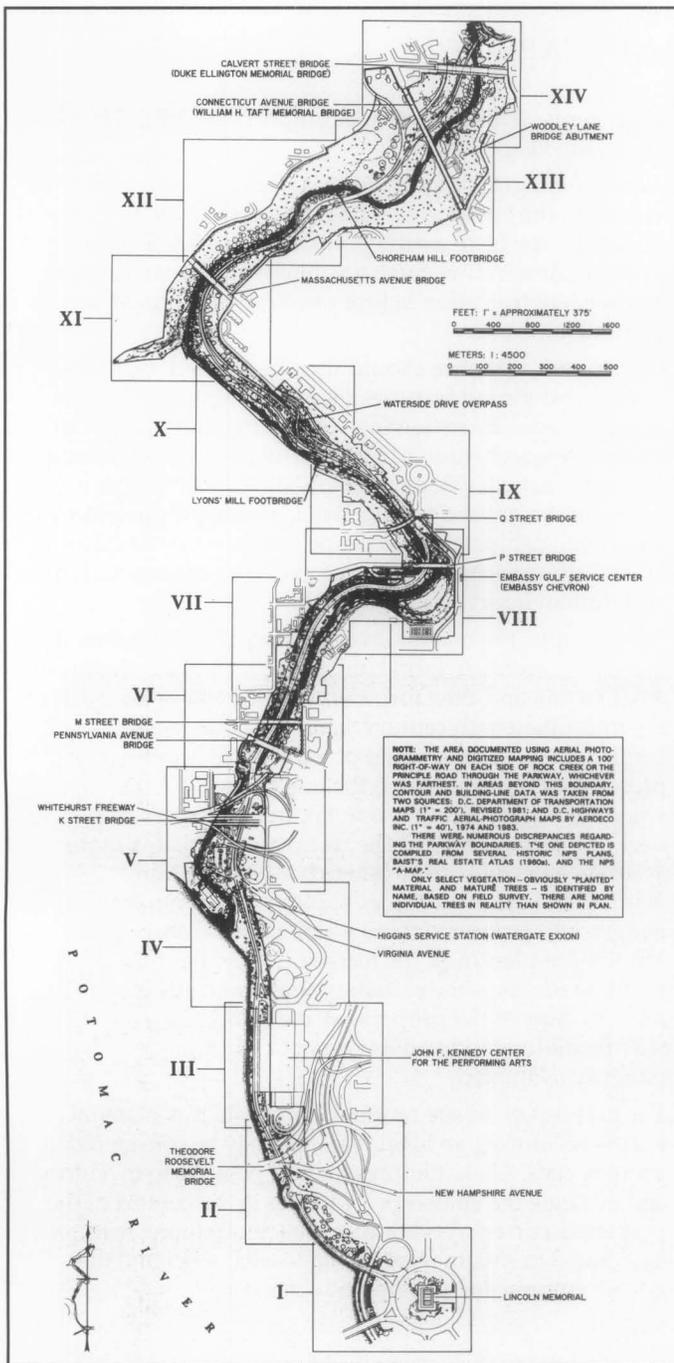
The findings of on-site reconnaissance, such as materials uncovered during archival research, may be considered primary data. These findings make it possible to inventory and evaluate the landscape's features in the context of the property's current condition. Character-defining features are located *in situ*, in relationship to each other and the greater cultural and geographic contexts.

Figure 22, page 11 for an example.) The points may also correspond to historic views to illustrate the change in the landscape to date. These locations may also be used as a management tool to document the landscape's evolution, and to ensure that its character-defining features are preserved over time through informed maintenance operations and later treatment and management decisions.

All features that contribute to the landscape's historic character should be recorded. These include the physical features described on page 1 (e.g. topography, circulation), and the visual and spatial relationships that are character-defining. The identification of existing plants, should be specific, including genus, species, common name, age (if known) and size. The woody, and if appropriate, herbaceous plant material should be accurately located on the existing conditions map. To ensure full representation of successional herbaceous plants, care should be taken to document the landscape in different seasons, if possible.

Treating living plant materials as a curatorial collection has also been undertaken at some cultural landscapes. This process, either done manually or by computer, can track the condition and maintenance operations on individual plants. Some sites, such as the Frederick Law Olmsted National Historic Site, in Brookline, Massachusetts have developed a field investigation numbering system to track all woody plants. (See Table, page 9) Due to concern for the preservation of genetic diversity and the need to replace significant plant materials, a number of properties are beginning to propagate historically important rare plants that are no longer commercially available, unique, or possess significant historic associations. Such herbarium collections become a part of a site's natural history collection.

Once the research and the documentation of existing conditions have been completed, a foundation is in place to analyze the landscape's continuity and change, determine its significance, assess its integrity, and place it within the historic context of similar landscapes.



Figures 14 and 15: Existing conditions plans for large corridor landscapes can employ a variety of documentation methodologies. For the 2-1/2 mile Rock Creek and Potomac Parkway, Washington, D.C., the Historic American Buildings Survey (HABS) used aerial photogrammetric photographs as the basis for digitized mapping and delineated drawings. Overall documentation was done at a scale of 1" = 40' with a 100' either side geographic context. Contours were shown at 2' intervals, tree canopy with trunk placement for specimen species, bridges (also drawn in detail), roads, and the creek itself. In all, there are 36 drawings measuring 34" x 44" for the project. These two sample drawings include the index to plans (above) and an area of existing conditions documentation (opposite top). (courtesy Historic American Buildings Survey)



Figures 16 and 17: Landscapes cannot be inventoried in a vacuum. Therefore, an understanding of its geographic context or setting should be part of inventory process. At Rancho Los Alamitos, Long Beach, California (middle and bottom opposite), a comparison between the 1936 aerial view with a present day aerial photograph illustrates the encroachments and adjacent developments that will affect the future treatment of visual and spatial relationships. (courtesy Rancho Los Alamitos Foundation)

## HISTORIC PLANT INVENTORY

Within cultural landscapes, plants may have historical or botanical significance. A plant may have been associated with a historic figure or event or be part of a notable landscape design. A plant may be an uncommon cultivar, exceptional in size, age, rare and commercially/unavailable. If such plants are lost, there would be a loss of historic integrity and biological diversity of the cultural landscape. To ensure that significant plants are preserved, an inventory of historic plants is being conducted at the North Atlantic Region of the National Park Service.<sup>8</sup> Historical landscape architects work with landscape managers and historians to gather oral and documented history on the plant's origin and potential significance. Each plant is then examined in the field by an expert horticulturist who records its name, condition, age, size, distribution, and, any notable botanic characteristics.

Plants that are difficult to identify or are of potential historical significance are further examined in the laboratory by a plant taxonomist who compares leaf, fruit, and flower characteristics with herbarium specimens for named species, cultivars and varieties. For plants species with many cultivars, such as apples, roses, and grapes, specimens may be sent to specialists for identification.

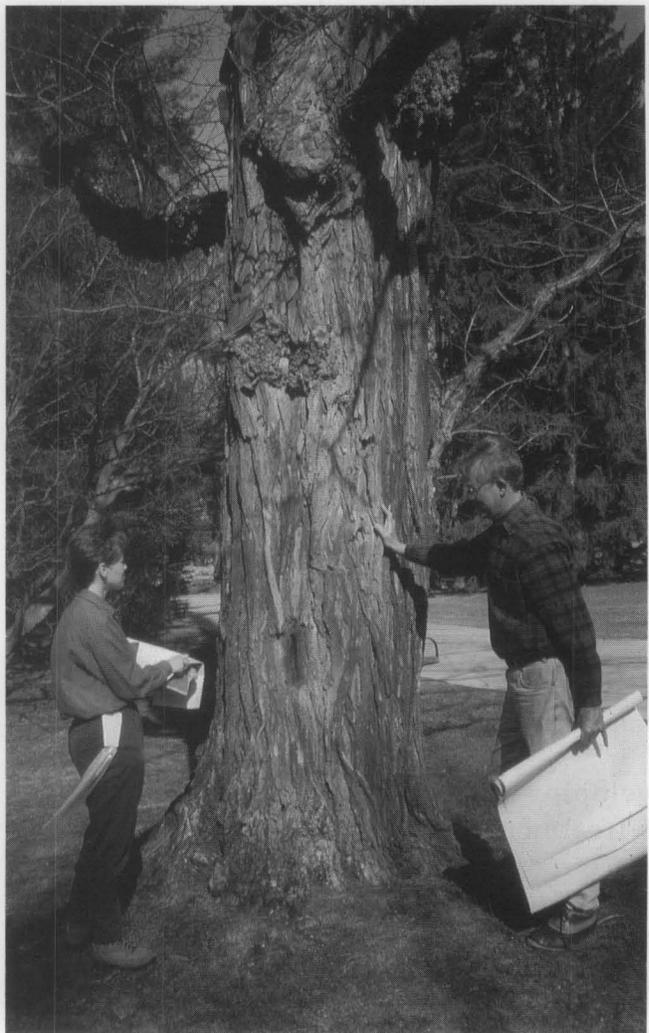
If a plant cannot be identified, is dying or in decline, and unavailable from commercial nurseries, it may be propagated. Propagation ensures that when rare and significant plants decline, they can be replaced with genetically-identical plants. Cuttings are propagated and grown to replacement size in a North Atlantic Region Historic Plant Nursery.



1. The Arnold Arboretum's preservation technician, lilac specialist, and horticulturist compare lilacs from the Vanderbilt Mansion National Historic Site in Hyde Park, New York with lilac specimens in the Arboretum's living collection. (courtesy Olmsted Center)



3. The Arnold Arboretum's horticulturist, landscape historian, and preservation technician examine shrubs at the Longfellow National Historic Site in Cambridge, MA. (courtesy Olmsted Center)



2. The Arnold Arboretum's horticulturist and preservation technician examine an enormous black locust tree at the Home of F.D. Roosevelt National Historic Site in Hyde Park, NY. (courtesy Olmsted Center)

## Site Analysis: Evaluating Integrity and Significance

By analyzing the landscape, its change over time can be understood. This may be accomplished by overlaying the various period plans with the existing conditions plan. Based on these findings, individual features may be attributed to the particular period when they were introduced, and the various periods when they were present.

It is during this step that the *historic significance* of the landscape component of a historic property and its integrity are determined. Historic significance is the recognized importance a property displays when it has been evaluated, including when it has been found to meet National Register Criteria.<sup>9</sup> A landscape may have several areas of historical significance. An understanding of the landscape as a continuum through history is critical in assessing its cultural and historic value. In order for the landscape to have integrity, these character-defining features or qualities that contribute to its significance must be present.

While National Register nominations document the significance and integrity of historic properties, in general, they may not acknowledge the significance of the landscape's design or historic land uses, and may not contain an inventory of landscape features or characteristics. Additional research is often necessary to provide the detailed information about a landscape's evolution and significance useful in making decision for the treatment and maintenance of a historic landscape. Existing National Register forms may be amended to recognize additional areas of significance and to include more complete descriptions of historic properties that have significant land areas and landscape features.

*Integrity* is a property's historic identity evidenced by the survival of physical characteristics from the property's historic or prehistoric period. The seven qualities of integrity are location, setting, feeling, association, design, workmanship and materials.<sup>10</sup> When evaluating these qualities, care should be taken to consider change itself. For example, when a second-generation woodland overtakes an open pasture in a battlefield landscape, or a woodland edge encloses a scenic vista. For situations such as these, the reversibility and/or compatibility of those features should be considered, both individually, and in the context of the overall landscape. Together, evaluations of significance and integrity, when combined with historic research, documentation of existing conditions, and analysis findings, influence later treatment and interpretation decisions. (See Figure 21-23)

## Developing a Historic Preservation Approach and Treatment Plan

Treatment may be defined as work carried out to achieve a historic preservation goal—it cannot be considered in a vacuum. There are many practical and philosophical factors that may influence the selection of a treatment for a landscape. These include the relative historic value of the property, the level of historic documentation, existing physical conditions, its historic significance and integrity, historic and proposed use (e.g. educational, interpretive, passive, active public, institutional or private), long- and short-term objectives, operational and code requirements (e.g. accessibility, fire, security) and costs for anticipated capital improvement, staffing and maintenance. The value of any significant archeological and natural resources



Figure 18: At Lawnfield, the home of President James A. Garfield near Cleveland, Ohio, the Sugar Maple that shadowed the porch during Garfield's 1880 "Front Porch Campaign" is in decline. Cuttings were taken from the historically significant tree by the Holden Arboretum and the National Park Service for eventual in-kind replacement. (courtesy NPS, Midwest Region)



Figure 19: The landscape of Lyndhurst, Tarrytown, New York is significant in American culture and meets Criterion C of the National Register because it embodies the distinctive character of a type and period in American landscape architecture, known as early Picturesque; it possesses high artistic value; and it is the work of a recognized master gardener, Ferdinand Mangold. (courtesy National Trust for Historic Preservation)



Figure 20: Cultural landscapes often contain plant communities such as orchards or meadows—both of which may or may not require a management intervention. When analyzing a landscape, it is important to recognize the present-day biodiversity of these resources—for example at the Fruita Rural Historic District in Capitol Reef National Park in Utah, the landscape contains 2,500 fruit trees associated with settlement and agriculture on the Colorado Plateau (courtesy D. White).

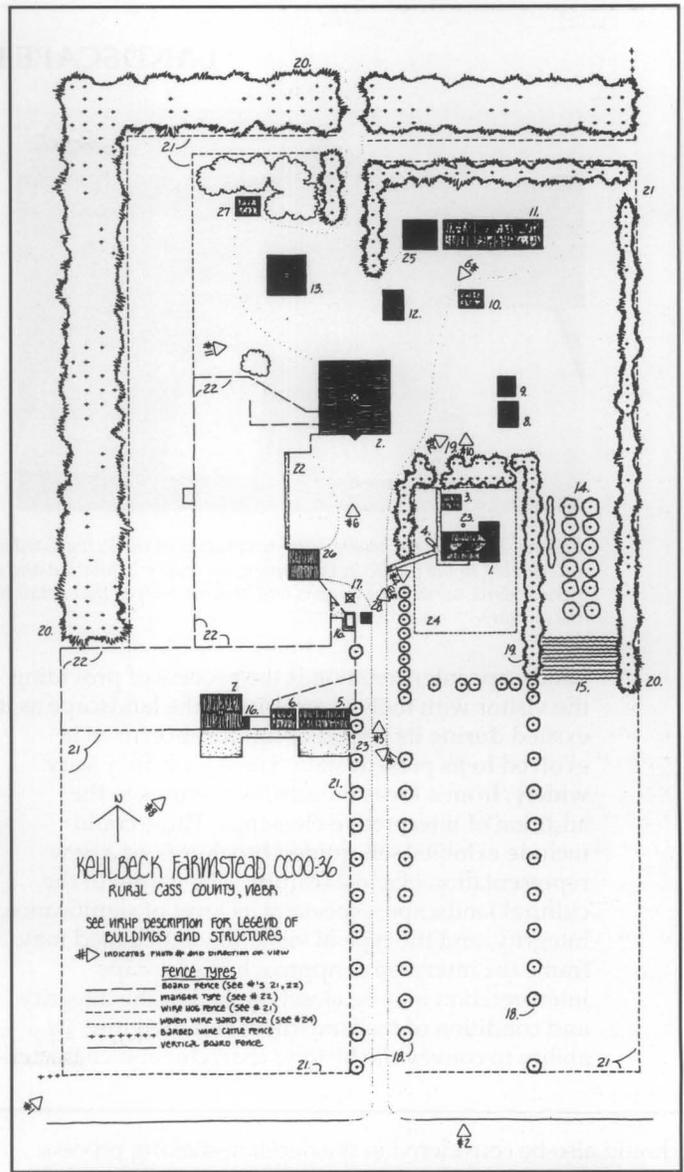
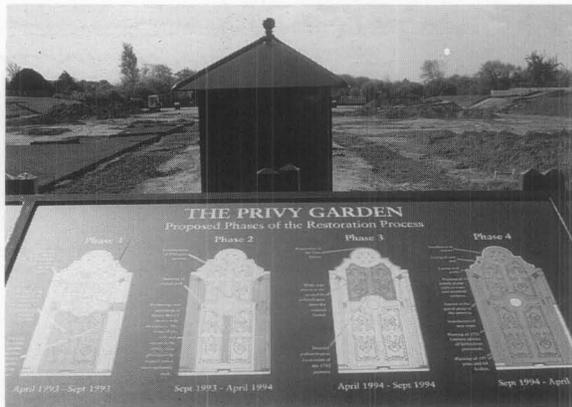


Figure 21: Integrity can involve both continuity and change. This can be evidenced by a detailed review of materials. Although the surface material has changed on some roads through the Port Oneida (near Empire, Michigan) community, the character-defining alignment, width and rows of Sugar Maple trees remain intact. (courtesy NPS, Midwest Region).



Figures 22 and 23: The plan for the Kehlbeck Farmstead, located in Cass County in Southeastern Nebraska, illustrates a well-planned, and aesthetically arranged general farm complex of the twentieth century. The farmstead is composed of 23 contributing and 5 non-contributing resources. Integrity was judged uniformly high because many character-defining resources were present and the visual and spatial relationships intact. Note the varied graphic techniques used to document a variety of fence types, and, the key to photographs illustrating the various landscape features and spatial relationships. The photograph above, labeled #3 on the farmstead, is looking north along the farm lane allee. (courtesy National Register Files)

## LANDSCAPE INTERPRETATION



Figures A and B: Archeology and restoration of the Privy Garden at Hampton Court Palace gardens, England. The project is being interpreted to the public in the garden, an indoor exhibition and a multimedia show. The outdoor interpretive display, (above left) includes period plans, aerial photographs and historic images that detail the history of the garden and current work, 1994. (courtesy the author)

Landscape interpretation is the process of providing the visitor with tools to experience the landscape as it existed during its period of significance, or as it evolved to its present state. These tools may vary widely, from a focus on existing features to the addition of interpretive elements. These could include exhibits, self-guided brochures, or a new representation of a lost feature. The nature of the cultural landscape, especially its level of significance, integrity, and the type of visitation anticipated may frame the interpretive approach. Landscape interpretation may be closely linked to the integrity and condition of the landscape, and therefore, its ability to convey the historic character and character-

defining features of the past. If a landscape has high integrity, the interpretive approach may be to direct visitors to surviving historic features without introducing obtrusive interpretive devices such as free-standing signs. For landscapes with a diminished integrity, where limited or no fabric remains, the interpretive emphasis may be on using extant features and visual aids (e.g. markers, photographs, etc.) to help visitors visualize the resource as it existed in the past. The primary goal in these situations is to educate the visitor about the landscape's historic themes, associations and lost character-defining features or broader historical, social and physical landscape contexts.

should also be considered in the decision-making process. Therefore, a cultural landscape's preservation plan and the treatment selected will consider a broad array of dynamic and interrelated considerations. It will often take the form of a plan with detailed guidelines or specifications.

Adopting such a plan, in concert with a preservation maintenance plan (page 18-19), acknowledges a cultural landscape's ever-changing existence and the interrelationship of treatment and ongoing maintenance. Performance standards, scheduling and record keeping of maintenance activities on a day-to-day or month-to-month basis, may then be planned for. Treatment, management, and maintenance proposals can be developed by a broad range of professionals and with expertise in such fields as landscape preservation, horticulture, ecology, and landscape maintenance.

The selection of a primary treatment for the landscape, utilizing the Secretary of the Interior's Standards for the Treatment of Historic Properties, establishes an overall historic preservation approach, as well as a philosophical framework from which to operate. Selecting a treatment is based on many factors. They include management and interpretation objectives for the property as a whole, the period(s) of significance, integrity, and condition of individual landscape features.

For all treatments, the landscape's existing conditions and its ability to convey historic significance should be carefully considered. For example, the life work, design philosophy and extant legacy of an individual designer should all be understood for a designed landscape such as an estate, prior to treatment selection. For a vernacular landscape, such as a battlefield containing a largely intact mid-nineteenth century family farm, the uniqueness of that agrarian complex within a local, regional, state, and national context should be considered in selecting a treatment.

The overall historic preservation approach and treatment approach can ensure the proper retention, care, and repair of landscapes and their inherent features.<sup>11</sup> In short, the Standards act as a preservation and management tool for cultural landscapes. The four potential treatments are described in the box opposite.

Landscape treatments can range from simple, inexpensive preservation actions, to complex major restoration or reconstruction projects. The progressive framework is inverse in proportion to the retention of historic features and materials. Generally, preservation involves the least change, and is the most respectful of historic materials. It maintains the form and material of the existing landscape. Rehabilitation usually accommodates contemporary

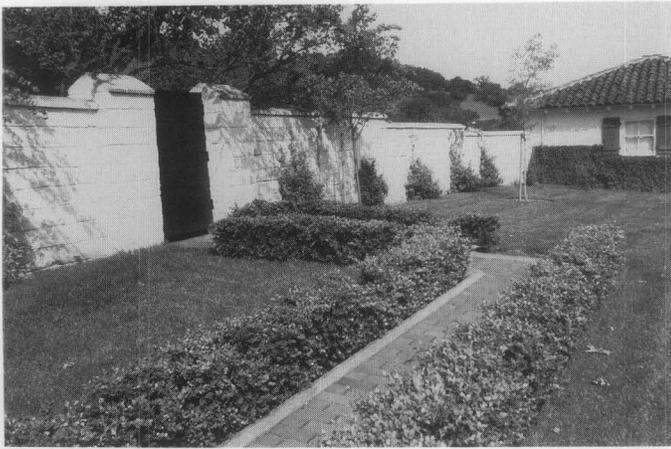


Figure 24: On some occasions, especially larger landscapes, it is possible to have a primary treatment, with discrete, or secondary areas of another treatment. This is most common for an individual feature in a larger landscape. At the Eugene and Carlotta O'Neill Historic Site, Danville, California the primary treatment selected for the courtyard was restoration. When accommodating universal accessibility requirements, the introduction of a grass paver walk was installed which warranted the removal of a few historic shrubs. This discrete project would be considered a rehabilitation treatment. (courtesy Patricia M. O'Donnell)

## TREATMENTS FOR CULTURAL LANDSCAPES

Prior to undertaking work on a landscape, a treatment plan or similar document should be developed. The four primary treatments identified in the Secretary of the Interior's Standards for the Treatment of Historic Properties<sup>12</sup>, are :

**Preservation** is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.

**Rehabilitation** is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical or cultural values.

**Restoration** is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

**Reconstruction** is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.



Figures 25 and 26: When the American Elm (*Ulmus americana*) was plagued with Dutch Elm Disease many historic properties relied on the Japanese Zelkova (*Zelkova serrata*) as a substitute plant. As illustrated, the overall form and scale of these trees is really quite different, and would therefore not be an appropriate substitute plant material under a restoration or reconstruction treatment.

alterations or additions without altering significant historic features or materials, with successful projects involving minor to major change. Restoration or reconstruction attempts to recapture the appearance of a property, or an individual feature at a particular point in time, as confirmed by detailed historic documentation. These last two treatments most often require the greatest degree of intervention and thus, the highest level of documentation.

In all cases, treatment should be executed at the appropriate level reflecting the condition of the landscape, with repair work identifiable upon close inspection and/or indicated in supplemental interpretative information. When repairing or replacing a feature, every effort should be made to achieve visual and physical compatibility. Historic materials should be matched in design, scale, color and texture.

A landscape with a high level of integrity and authenticity may suggest preservation as the primary treatment. Such a treatment may emphasize protection, stabilization, cyclical maintenance, and repair of character-defining landscape features. Changes over time that are part of the landscape's continuum and are significant in their own right may be



Figure 27: The historic birch alley at Stan Hywet Hall, Akron, Ohio was suffering from borer infestation and leaf miner. Dying trees were topped and basal sprout growth encouraged. Next, trees were selectively thinned, and ultimately, when the new growth matured, older trunks were removed. Original rootstock and genetic material were preserved. As illustrated, this preservation treatment took fifteen years to realize. (courtesy Child Associates)



Figure 28: Patterns on the land have been preserved through the continuation of traditional uses such as the grape fields at the Sterling Vineyards in Calistoga, California. (courtesy author)



Figures 29: Rehabilitation was selected as the primary treatment for Columbus Park, Chicago, Illinois. Originally designed and executed between 1917 and 1920 by Jens Jensen, the waterfall, cascades, rocky brook and associated landscape, are well documented and possesses a high level of integrity. (courtesy author)

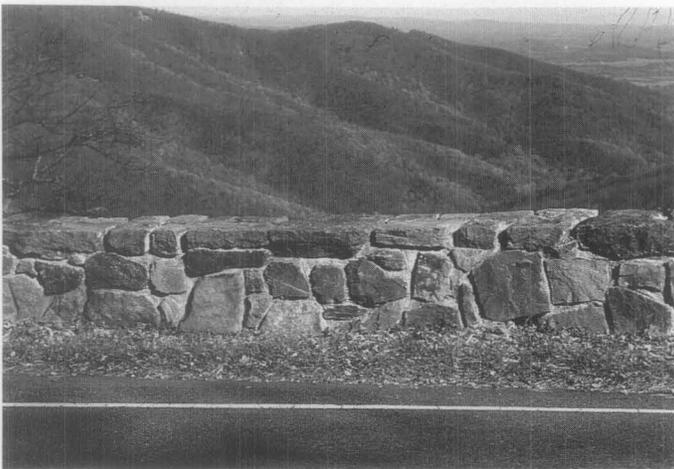


Figure 30, 31: A 75-mile portion of Skyline Drive at Shenandoah National Park overlooking the Blue Ridge Mountains of Virginia required the rehabilitation of a 22"-high, dry-laid stone wall. The new wall was built to a height of 27" – code normally requires a height of 36". The wall was constructed of percast concrete, clad with split stone and mortar joints. To achieve visual compatibility recessed mortar joints were arranged in a random pattern (courtesy Robert R. Page)



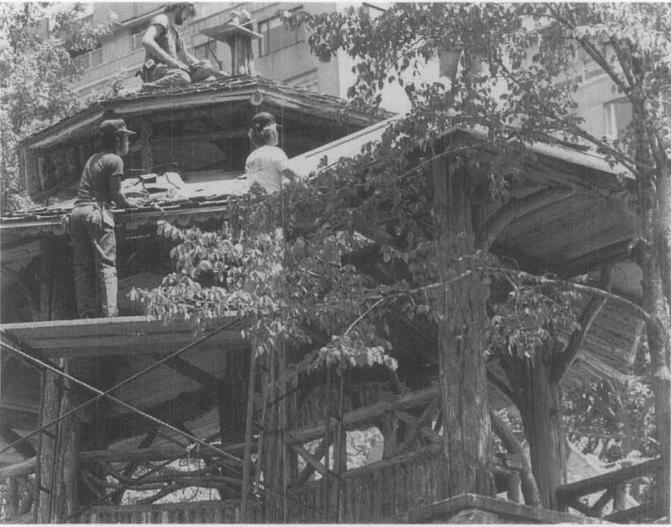
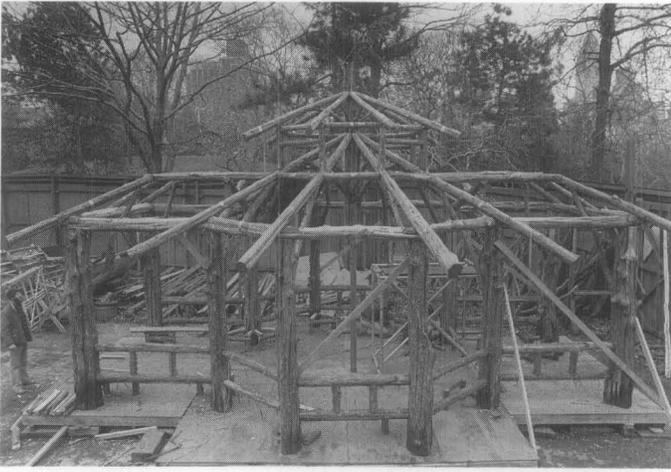


Figure 35-37: Central Park has developed an in-house historic preservation crew to undertake small projects. A specialized crew has been trained to specifically repair and rebuild rustic furnishings. As illustrated, the restoration of the Dene rustic shelter was achieved by constructing it in the Ramble compound, moving in-place opposite 67th street and completed. (courtesy Central Park Conservancy)

## Developing a Preservation Maintenance Plan and Implementation Strategy

Throughout the preservation planning process, it is important to ensure that existing landscape features are retained. Preservation maintenance is the practice of monitoring and controlling change in the landscape to ensure that its historic integrity is not altered and features are not lost. This is particularly important during the research and long-term treatment planning process. To be effective, the maintenance program must have a guiding philosophy, approach or strategy; an understanding of preservation maintenance techniques; and a system for documenting changes in the landscape.

The philosophical approach to maintenance should coincide with the landscape's current stage in the preservation planning process. A Cultural Landscape Report and Treatment Plan can take several years to complete, yet during this time managers and property owners will likely need to address immediate issues related to the decline, wear, decay, or damage of landscape features. Therefore, initial maintenance operations may focus on the stabilization and protection of all landscape features to provide temporary, often emergency measures to prevent deterioration, failure, or loss, without altering the site's existing character.

After a Treatment Plan is implemented, the approach to preservation maintenance may be modified to reflect the objectives defined by this plan. The detailed specifications prepared in the Treatment Plan relating to the retention, repair, removal, or replacement of features in the landscape should guide and inform a comprehensive preservation maintenance program. This would include schedules for monitoring and routine maintenance, appropriate preservation maintenance procedures, as well as ongoing record keeping of work performed. For vegetation, the preservation maintenance program would also include thresholds for growth or change in character, appropriate pruning methods, propagation and replacement procedures.

To facilitate operations, a property may be divided into discrete management zones (Figure 41). These zones are sometimes defined during the Cultural Landscape Report process and are typically based on historically defined areas. Alternatively, zones created for maintenance practices and priorities could be used. Examples of maintenance zones would include woodlands, lawns, meadow, specimen trees, and hedges.

Training of maintenance staff in preservation maintenance skills is essential. Preservation maintenance practices differ from standard maintenance practices because of the focus on perpetuating the historic character or use of the landscape rather than beautification. For example, introducing new varieties of turf, roses or trees is likely to be inappropriate. Substantial earth moving (or movement of soil) may be inappropriate where there are potential archeological resources. An old hedge or shrub should be rejuvenated, or propagated, rather than removed and replaced. A mature specimen tree may require cabling and careful monitoring to ensure that it is not a threat to visitor safety. Through training programs and with the assistance of preservation maintenance specialists, each property could develop maintenance specifications for the care of landscape features.

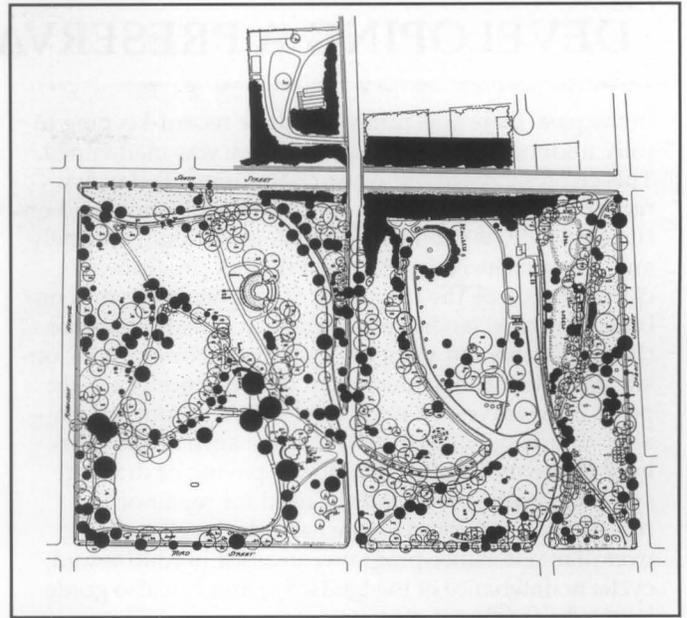
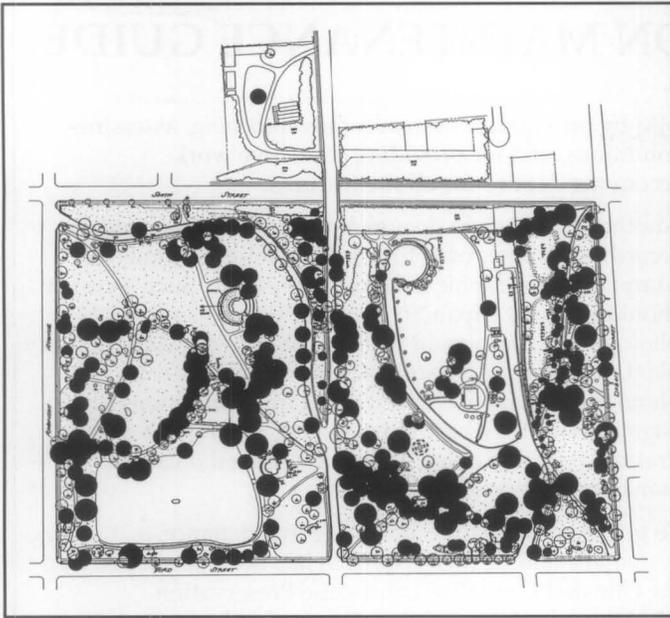
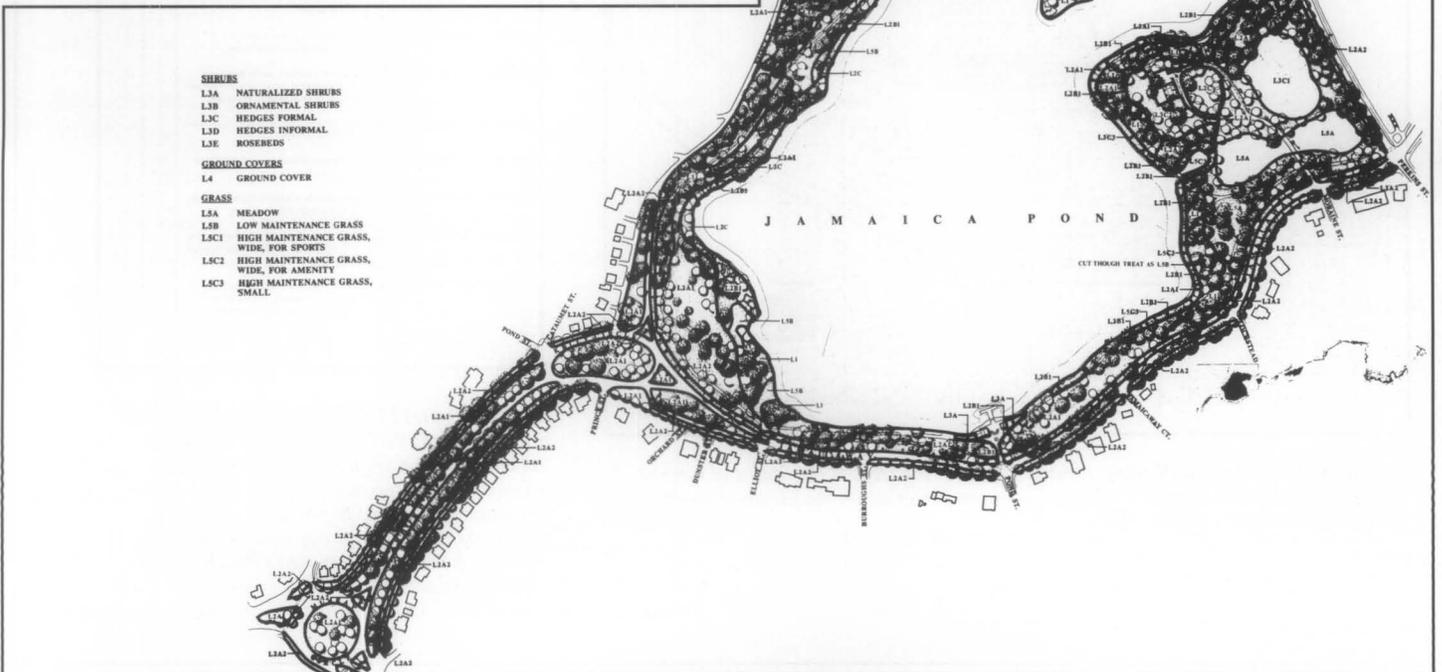


Figure 38 and 39 (above, left and right): The importance of landscape analysis and its ability to inform treatment and maintenance decisions is reflected in these two plans for Downing Park, Newburgh, New York. The plan, rendered in black, top left, illustrates all extant historic plants, while the plan, top right, depicts plantings which are non-historic or invasive for removal or relocation outside of the historic park. (courtesy LANDSCAPES)



Figure 40: A management decision was made to place a fence around a sentinel tree in Balboa Park, San Diego, California. The fence protects the specimen from root damage—impact from excessive pedestrian compaction or lawn mower damage. (courtesy author).

Figure 41 (below): A small property of under an acre may only have a few management zones including lawn, trees over lawn, shrub and herbaceous borders. Larger, more complex landscapes such as Jamaica Pond Park, Boston and Brookline, Massachusetts, contains a broader range of management zones including: forests, trees over grass—broad areas, trees over grass—narrow areas, meadows, and mown grass for active recreation amenities or passive use. (courtesy Walmsley/Pressley Joint Venture)



# DEVELOPING A PRESERVATION MAINTENANCE GUIDE

In the past, there was rarely adequate record-keeping to fully understand the ways a landscape was maintained. This creates gaps in our research findings. Today, we recognize that planning for ongoing maintenance and on-site applications should be documented—both routinely and comprehensively. An annual work program or calendar records the frequency of maintenance work on built or natural landscape features. It can also monitor the age, health and vigor of vegetation. For example, on-site assessments may document the presence of weeds, pests, dead leaves, pale color, wilting, soil compaction—all of which signal particular maintenance needs. For built elements, the deterioration of paving or drainage systems may be noted and the need for repair or replacement indicated before hazards develop. An overall maintenance program can assist in routine and cyclic maintenance of the landscape and can also guide long term treatment projects.

To help structure a comprehensive maintenance operation that is responsive to staff, budget, and maintenance priorities, the National Park Service has developed two computer-driven programs for its own landscape resources. A Maintenance Management Program (MM) is designed to assist maintenance managers in their efforts to plan, organize, and direct the park maintenance system. An Inventory and Condition Assessment Program (ICAP) is designed to complement

MM by providing a system for inventorying, assessing conditions, and for providing corrective work recommendations for all site features.

Another approach to documenting maintenance and recording changes over time is to develop a manual or computerized graphic information system. Such a system should have the capability to include plans and photographs that would record a site's living collection of plant materials. (Also see discussion of the use of photography under Preparing Existing Conditions Plans, page 5.) This may be achieved using a computer-aided drafting program along with an integrated database management system.

To guide immediate and ongoing maintenance, a systematic and flexible approach has been developed by the Olmsted Center for Landscape Preservation. Working with National Park Service landscape managers and maintenance specialists, staff assemble information and make recommendations for the care of individual landscape features.

Each landscape feature is inspected in the field to document existing conditions and identify field work needed. Recommendations include maintenance procedures that are sensitive to the integrity of the landscape.

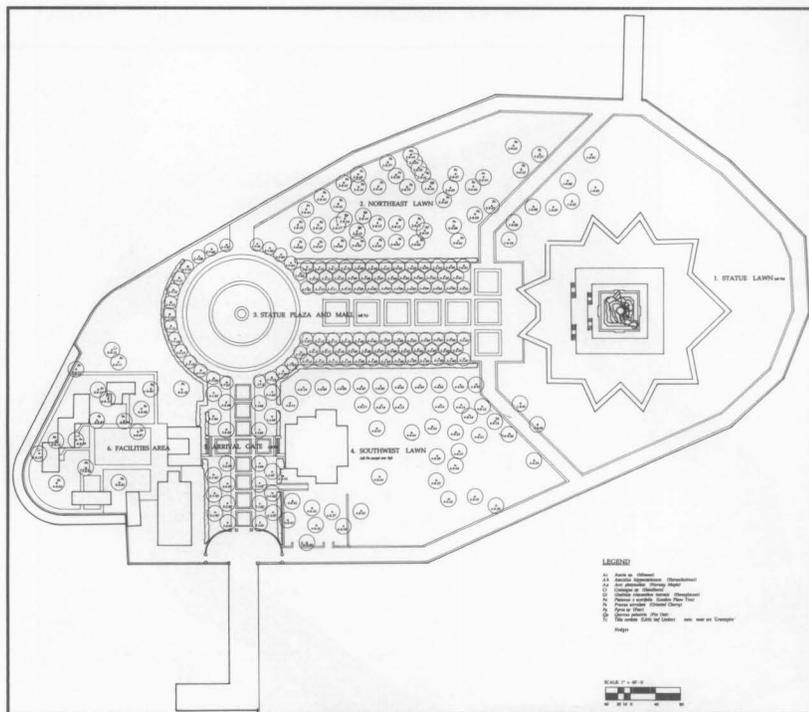


Figure A - Existing Conditions: A map of the existing trees at the Statue of Liberty National Monument is used to indicate necessary preservation maintenance work (Drawn by Margaret Coffin, 1992)

Statue of Liberty National Monument FIELD INVENTORY, INSPECTION, AND WORK NEEDED											
Category: Specimen Trees											
Area: 4 - South Lawn											
Feature Name and Field ID#	Tree Data				Comment on size, age, condition, field diagnosis and work needed:	Preserve	Remove	Work	Photo	Notes	Status
	DBH	HT	TR	BR							
London Plane Tree 4-0-26	2.2	2.2	2.2	-2-n	Large scar from branch split, structurally weak tree, remove branches with decay at base, plan for replacement	yes	x			P	
London Plane Tree 4-0-27	3.1	2.2	2.2	-2-n	leaner, crowded by larger adjacent tree, remove dead branches	no	*				
London Plane Tree 4-0-28	3.1	3.3	3.3	-3-n	internal decay, remove large dead branches	yes	*				
London Plane Tree 4-0-29	2.1	2.2	2.2	-2-n	fair condition, remove dead watersprouts from trunk and dead branches	no	*				
London Plane Tree 4-0-30	1.2	2.2	2.2	-2-n	good condition, remove watersprouts from trunk	no	x				
London Plane Tree 4-0-31	2.3	3.1	3.1	-2-n	fair condition, needs structural pruning at top of crown, remove three dead broken branches	no	*				
London Plane Tree 4-0-32	1.3	2.2	2.2	-2-n	good overall condition, remove one dead branch	no	*				
London Plane Tree 4-0-33	3.2	2.1	2.1	-1-n	leaner, remove two of five lower branches	no	x				
London Plane Tree 4-0-34	1.2	2.2	2.2	-2-n	remove watersprouts from trunk, re-cut dead branch spur	no	x				
London Plane Tree 4-0-35	2.2	2.2	2.2	-2-n	remove watersprouts from trunk, needs structural pruning throughout	no	x				
London Plane Tree 4-0-36	3.3	3.3	3.3	-3-n	in decline, dieback throughout, safety hazard, remove all deadwood, plan for replacement	yes	*			P	

Figure B - Field Inventory, Inspection, and work needed: Within areas of the landscape, each feature is assigned a field identification number. An inspection is conducted to assess the condition, potential problems, such as deadwood or integral decay, and specify work needed. A map (above) is used to locate features that require attention

Statue of Liberty National Monument FEATURE DATA - LONDON PLANE TREE	
CATEGORY:	Deciduous Tree
AREAS:	4- South Lawn
FEATURE NAME:	London Plane tree ( <i>Platanus x acerifolia</i> )
SOURCE OF IDENTIFICATION:	Al Furruglio, STLI Horticulturist, 1992
<b>DESCRIPTIVE CHARACTERISTICS:</b> The fruit of London Plane Tree is typically in clusters of 2, leaves are large, 5'-10" width whereas the fruit of American Sycamore is singular, and leaves are slightly smaller.	
<b>HISTORICAL SIGNIFICANCE/ APPEARANCE/ INTENT:</b> London Plane trees were specified in the General Development Plan by Norman Newton in 1937 (Newton, N. T. Design on the Land, Harvard University Press, 1971, p. 543).	
<b>PRESERVATION PRACTICES AND WORK PROCEDURES:</b>	
<b>Winter -</b> Prune out dead, damaged wood and watersprouts as needed. Inspect for interior decay and pest damage. Disinfect tools between cuts to prevent spread of canker stain disease.	
<b>Spring -</b> <b>Trunk protection.</b> Take preventative actions to protect the base of each tree from string trimmer damage. Train all equipment operators. <b>Monitor and treat anthracnose.</b> Prolonged periods of cool, moist, damp spring weather will increase anthracnose. The best times to control anthracnose are before bud break, at bud break, and when leaves have expanded. <b>Transplant.</b> Spring is the best time to transplant trees.	
<b>Summer -</b> <b>Water.</b> Newly transplanted trees so that they receive one inch of water every 10 days. To water, set up water bags around the base of the tree at the end of the day. Remove empty bags in the morning. Do not overwater.	
<b>Fall -</b> Rake, up London Plane tree leaves and dispose off site to remove anthracnose inoculum.	
<b>PESTS, DISEASES AND CULTURAL PROBLEMS:</b> Pests - Plum Borer, Lecanium Scale, Sycamore Lace Bug, Aphids, Fall Webworm Diseases - Anthracnose, Canker stain, Wetwood, Powdery Mildew Cultural Problems - Susceptible to drought stress, frequently produces watersprouts, often vandalized by carving in bark.	
<b>RECOMMENDED METHOD AND SOURCE OF REPLACEMENT:</b> Replace in-kind with nursery stock. Consider anthracnose resistant cultivars that are similar in size and character to the straight species.	
<b>PROPAGATION METHOD:</b> Take root cuttings in July or August. Treat with IBA.	
<b>ADDITIONAL SOURCES OF INFORMATION:</b> Shigo, Alex L. A New Tree Biology. Durham NH: Shigo & Trees, Assoc., 1986. Sinclair, Lyon & Johnson. Diseases of Trees & Shrubs. Ithaca NY: Cornell U. Press, 1987.	

**Figure C - Feature Data:** For each feature that requires special care, a detailed sheet is developed. This contains notes on when to monitor and carry out work, specific procedures, cite potential problems, and perform repair or replacement.

Statue of Liberty National Monument CALENDAR - SPRING	
<b>FOR ALL TREES -</b> <b>Transplant.</b> Spring is the best time to transplant trees. <b>If soil or leaf analysis indicates that fertilizer is needed,</b> late fall is the best time to fertilize trees. However, fertilizer may also be applied in early Spring, before bud break. Use an organic fertilizer with the micronutrients needed, such as manganese. If the lawn area below the trees is receiving fertilizer, additional fertilizer is not necessary. Light annual pruning throughout the tree tends to reduce the amount of fertilizer needed.	
<b>LONDON PLANE TREES -</b> <b>Trunk protection.</b> Take preventative actions to protect the base of each tree from string trimmer damage. Train all equipment operators. <b>Monitor and treat anthracnose.</b> Prolonged periods of cool, moist, damp spring weather will increase anthracnose. The best times to control anthracnose are before bud break, at bud break, and when leaves have expanded.	
<b>LINDENS -</b> Prune out crossing branches on young trees.	
<b>LAWN -</b> <b>Rake lawn areas</b> in the early spring to remove matted grass and accumulated debris. De-thatch lawn areas where thatch accumulation exceeds 3/4 of an inch. <b>Aerate with a core aerator,</b> lawn areas that are heavily compacted. However, do not aerate around the trees because of shallow roots. <b>Begin mowing and trimming operations.</b> Instruct all equipment operators on how to prevent damage to tree trunks. <b>Check soil pH.</b> Send soil samples to Cooperative Extension Service for analysis of pH, phosphorus and potassium levels. Apply lime and fertilizer as necessary to adjust the soil condition. <b>Fertilize</b> in late May or early June with an organic fertilizer with an analysis of 5-4-3 or equivalent. Apply at a rate of one pound of nitrogen per 1000 square feet. This is the first of three annual applications. <b>Inspect lawn areas</b> for pests (grubs) and disease (leaf spot, leaf smut) damage.	

**Figure D - Calendar for Monitoring and for Work:** All feature-specific monitoring and work recommendations are combined into one seasonal calendar for all areas of the landscape to ensure that important work activities are not overlooked.

Statue of Liberty National Monument RECORD KEEPING - FEATURE: LONDON PLANE TREE	
Record notes on measurements, conditions, work performed, reason for removal, replacement or installation, propagation method and growing location, status of feature, or reference to a related report, etc.	Measurements Major Work Minor Work Other Date and Initials Also see reference information
All deadwood and watersprouts removed by Arboriculture Class from University of Massachusetts	X AF 9/92
Replaced tree #4-0-26 with London Plane Tree, anthracnose-resistant cultivar 'Columbia' installed through Gardner Intake Project	X AF 4/93
#4-0-26 damaged by vandalism, re-set and re-staked.	X AF 5/93
Removed and replaced #4-0-37 with London Plane Tree, anthracnose resistant cultivar 'Liberty' in order to compare with 'Columbia'.	X AF 5/93
#4-0-26 'Columbia' and #4-0-37 'Liberty' both in fairly good condition. Both received water by gator bag 1x a week during July and August.	X AF 8/93

**Figure E - Record Keeping:** A record sheet is created for each type of feature. Maintenance staff may record information relating to changes in condition, major work performed, removal, replacement, propagation and any other events. As records are added too through the years, they become a valuable source of documentation of the landscape's history.

Because landscapes change through the seasons, specifications for ongoing preservation maintenance should be organized in a calendar format. During each season or month, the calendar can be referenced to determine when, where, and how preservation maintenance is needed. For example, for some trees structural pruning is best done in the late winter while other trees are best pruned in the late summer. Serious pests are monitored at specific times of the year, in certain stages of their life cycle. This detailed calendar will in turn identify staff needs and work priorities.

Depending on the level of sophistication desired, one approach to documenting maintenance data and recording change over time is to use a computerized geographical or visual information system.<sup>13</sup> Such a system would have the capability to include plans and photographs that would focus on a site's landscape features.

If a computer is not available, a manual or notebook can be developed to organize and store important information. This approach allows managers to start at any level of detail and to begin to collect and organize information about landscape features (see Box opposite and above). The value of these maintenance records cannot be overstated. These records will be used in the future by historians to understand how the landscape has evolved with the ongoing care of the maintenance staff.

## Recording Treatment Work and Future Research Recommendations

The last and ongoing step in the preservation planning process records the treatment work as carried out. It may include a series of as-built drawings, supporting photographic materials, specifications and a summary assessment. New technologies that have been successfully used should be

highlighted. Ideally, this information should be shared with interested national organizations for further dissemination and evaluation.

The need for further research or additional activities should also be documented. This may include site-specific or contextual historical research, archeological investigations, pollen analysis, search for rare or unusual plant materials, or, material testing for future applications.

Finally, in consultation with a conservator or archivist—to maximize the benefit of project work and to minimize the potential of data loss—all primary documents should be organized and preserved as archival materials. This may include field notes, maps, drawings, photographs, material samples, oral histories and other relative information.

## Summary

The planning, treatment, and maintenance of cultural landscapes requires a multi-disciplinary approach. In landscapes, such as parks and playgrounds, battlefields, cemeteries, village greens, and agricultural land preserves—more than any other type of historic resource—communities rightly presume a sense of stewardship. It is often this grass roots commitment that has been a catalyst for current research and planning initiatives. Individual residential properties often do not require the same level of public outreach, yet a systematic planning process will assist in making educated treatment, management and maintenance decisions.

Wise stewardship protects the character, and or spirit of a place by recognizing history as change over time. Often, this also involves our own respectful changes through treatment. The potential benefits from the preservation of cultural landscapes are enormous. Landscapes provide

scenic, economic, ecological, social, recreational and educational opportunities that help us understand ourselves as individuals, communities and as a nation. Their ongoing preservation can yield an improved quality of life for all, and, above all, a sense of place or identity for future generations.

## Selected Reading

Birnbaum, Charles A, guest editor. *Preservation Forum*. "Focus on Landscape Preservation". Washington, D.C.: National Trust for Historic Preservation, Volume 7, No. 3, May/June 1992.

Buggey Susan, guest editor. *APT Bulletin. Special Issue: Conserving Historic Landscapes*. Fredericksburg, VA: Association for Preservation Technology International, Volume XXIV, No. 3-4, 1992.

Burns, John A, and the Staff of HABS/HAER. *Recording Historic Structures*. American Institute of Architects Press, 1989. (Includes chapter on the documentation of Meridian Hill Park, pp. 206-219.)

Diehl, Janet and Thomas S. Barrett, et al. *The Conservation Easement Handbook. Managing Land Conservation and Historic Preservation Easement Programs*, The Land Trust Exchange (now Alliance) and the Trust for Public Land, 1988.

International Committee of Historic Gardens and Sites, ICOMOS-IFLA. *Jardins et Sites Historiques*, Scientific Journal. ICOMOS 1993. Compilation of papers on the subject, in both english and french.

Kelso, William M., and Rachel Most. *Earth Patterns: Essays in Landscape Archaeology*. Charlottesville, VA: University Press of Virginia, 1990.

Stokes, Samuel, N., et al. *Saving America's Countryside: A Guide to Rural Conservation*. Baltimore and London: John Hopkins University Press, 1989.

Tishler, William, editor. *American Landscape Architecture, Designers and Places*. Washington, DC: The Preservation Press, 1989.

Several publications available from the National Park Service deal directly with the preservation of historic landscapes. These include:

*America's Landscape Legacy*, Brochure, Preservation Assistance Division, 1992.

*Guidelines for the Treatment of Historic Landscapes*, Preservation Assistance Division, 1992 (Draft).

*Case Studies in Landscape Preservation*, Preservation Assistance Division in cooperation with the Alliance for Landscape Preservation, 1995.

*Cultural Landscapes Bibliography: An Annotated Bibliography of Resources in the National Park System*, Park Historic Architecture Division, 1992.

*Historic Landscape Directory; A Source Book of Agencies, Organizations, and Institutions Providing Information on Historic Landscape Preservation*, Preservation Assistance Division, 1991.

CRM, Cultural Resource Management, Thematic Issues: *The Preservation of Cultural Landscapes*, Volume 14, No.6,

1991; *A Reality Check for Our Nation's Parks*, Volume 16, No. 4, 1993; *Historic Transportation Corridors*, Volume 16, No. 11, 1993; and, *The Interpretation of Cultural Landscapes*, Volume 17, No. 8, 1994.

*Pioneers of American Landscape Design: An Annotated Bibliography*, Preservation Assistance Division, 1993 (ISBN:0-16-041974-3).

*Making Educated Decisions: A Landscape Preservation Bibliography*, Preservation Assistance Division, 1994 (ISBN:0-16-045145-0)

*National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes; National Register Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes; National Register Bulletin 40: Guidelines for Evaluating and Registering Battlefields; and, National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries*, Interagency Resources Division.

## Endnotes

<sup>1</sup> The cultural landscape definitions are contained in *NPS-28, Cultural Resource Management Guideline*, Release No. 4, 1994, National Park Service.

<sup>2</sup> For an expanded list of offices to contact, see *America's Landscape Legacy* brochure. Free from the National Park Service Preservation Assistance Division.

<sup>3</sup> From Kelso, William, *A Report on the Archeological Excavation at Monticello, Charlottesville, VA, 1979-1981*, Thomas Jefferson Memorial Foundation, 1982.

<sup>4</sup> Lewis, Pierce, "Common Landscapes as Historic Documents," Lubar, Steven and Kingery, W. David (eds.), *Essays on Material Culture*, Smithsonian Institution Press, Washington, DC, 1993, p. 138.

<sup>5</sup> Meinig, D. W. "The Beholding Eye: Ten Versions of the Same Scene," *The Interpretation of Ordinary Landscapes*, Oxford University Press, New York, 1979, pp. 33-48.

<sup>6</sup> See National Park Service *National Register Bulletins* under Selected Reading (opposite).

<sup>7</sup> The Historic American Buildings Survey, HABS, has generated standards for landscape documentation that they now utilize on a number of projects. Specifically, a case study on recording historic landscapes is included in *Recording Historic Structures*, pp. 206-219. See Selected Reading (opposite).

<sup>8</sup> This is being undertaken with technical assistance from the Olmsted Center for Landscape Preservation a partnership between the National Park Service and the Arnold Arboretum of Harvard University that provides cultural landscape technical assistance, technology development and training.

<sup>9</sup> See *National Register Bulletin 16A: How to Complete the National Register Registration Form*. Washington, D.C.: U.S. Department of the Interior, National Park Service, Interagency Resources Division, 1991.

<sup>10</sup> Ibid.

<sup>11</sup> The standards are general principles for the treatment of buildings, structures, sites, objects, districts and landscapes. The treatment standards are one set of standards included in the broader group known as the *Secretary of the Interior's Standards for Archaeology and Historic Preservation*.

<sup>12</sup> The Secretary of the Interior is responsible for establishing professional standards and providing advice on the preservation and protection of all cultural resources listed on or eligible for the National Register of Historic Places. For a copy of the brochure, *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, 1992 contact the National Park Service Preservation Assistance Division (424) Box 37127 Washington, DC 20013-7127.

<sup>13</sup> A visual information system, a computer-aided mapping program with a linked database, has been developed for the historic landscape at the Frederick Olmsted National Historic Site. Data can be accessed directly from a digitized map such as information on each plant including identification, age, location, size, condition, and maintenance history.

## Acknowledgements

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September 1994

**APPENDIX B: CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) AND  
HISTORICAL RESOURCES, TECHNICAL ASSISTANCE SERIES 1**

1

California Office of Historic Preservation  
Department of Parks & Recreation  
*Technical Assistance Series*

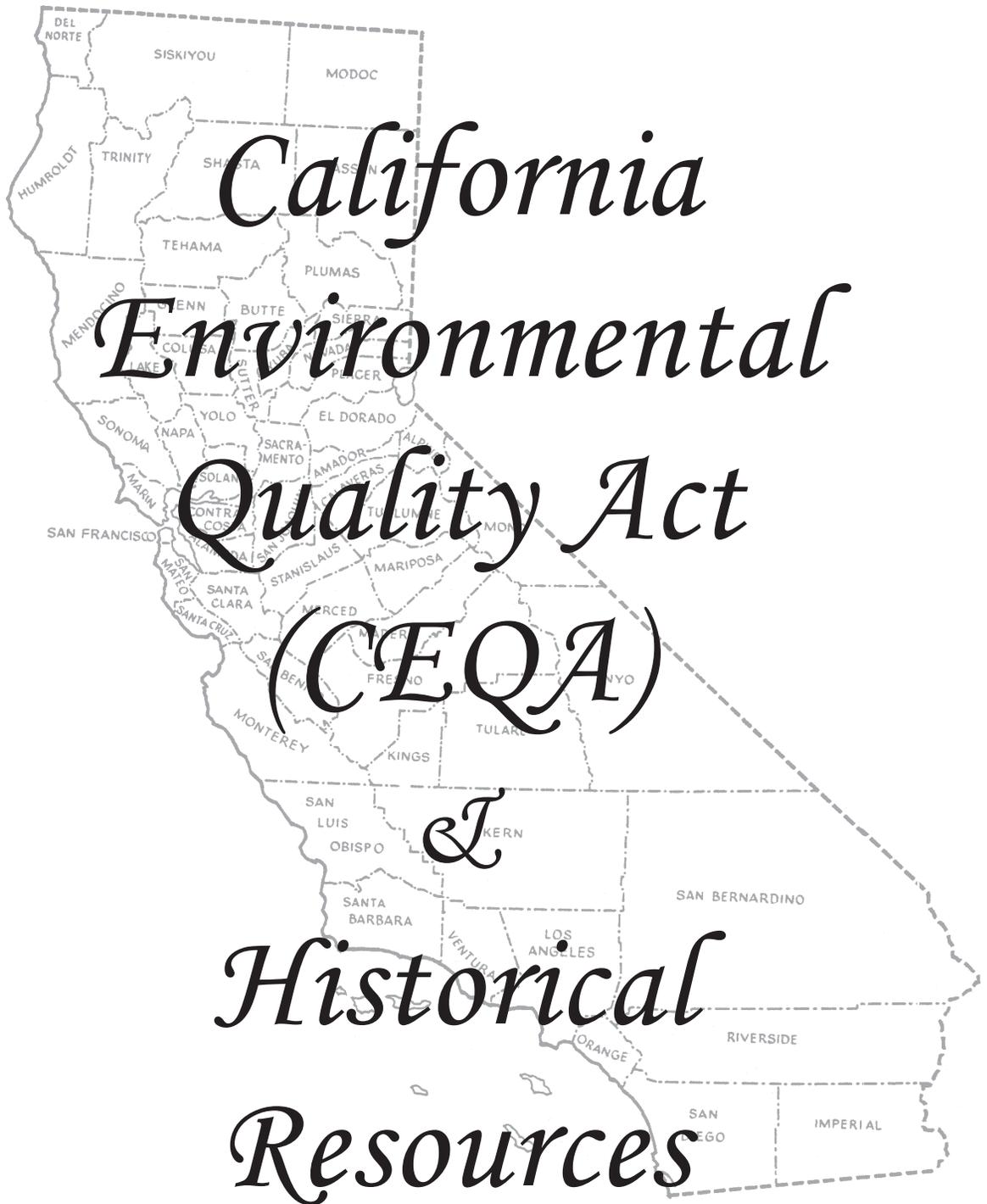


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03/01

# TABLE OF CONTENTS

Introduction .....	5
Questions and Answers .....	7
When does CEQA apply? .....	7
What is the California Register and what does it have to do with CEQA? .....	7
Are archeological sites part of the California Register? .....	8
What is “substantial adverse change” to an historical resource? .....	9
How can “substantial adverse change” be avoided or mitigated? .....	9
What are “exemptions” under CEQA and how are they used? .....	10
What are local CEQA Guidelines? .....	11
Who ensures CEQA is being followed properly? .....	11
How should a citizen approach advocating for historical resources under CEQA? ...	11
What information is useful to have on hand when contacting OHP about a CEQA project? .....	14
CEQA Information Sources .....	15
CEQA Statute and Guidelines .....	15
Technical Assistance Publications and General Information .....	16
Recent Case Law and CEQA Issues .....	16
Historic Preservation Advocacy .....	17
Appendix A: Form for Collection of Information about a Project .....	19
Appendix B: State Codes/Regulations Related to CEQA and Historical Resources ....	21
California Public Resources Code .....	21
California Code of Regulations, Title 14, Chapter 3 .....	23
Appendix C: California Register of Historical Resources .....	30
Eligibility Criteria .....	31
Integrity .....	31
Special Considerations .....	32
Appendix D: Secretary of the Interior’s Standards for Professionals in Historic Preservation .....	33
History .....	33
Archeology .....	34
Architectural History .....	34
Architecture .....	34
Historic Architecture .....	34
Appendix E: Secretary of the Interior’s Standards for the Treatment of Historic Properties .....	36
Four Treatment Approaches .....	36

Choosing an Appropriate Treatment.....	37
Standards for Preservation .....	38
Standards for Rehabilitation .....	39
Standards for Restoration.....	40
Standards for Reconstruction .....	41
Appendix F: A Guide to Planning In California .....	43
Introduction.....	43
State and Local Planning.....	44
The General Plan.....	45
Zoning.....	47
Subdivisions .....	49
Other Ordinances and Regulations.....	50
Annexation and Incorporation .....	50
The California Environmental Quality Act (CEQA).....	51
Glossary .....	52
Bibliography: A Few Good Books .....	57
Appendix G: Information Center Contact list .....	59
Appendix H: City of San Diego Sample Information.....	61
Appendix I: State Clearinghouse Handbook.....	71

# INTRODUCTION

The California Environmental Quality Act (CEQA – pronounced see' kwa) is the principal statute mandating environmental assessment of projects in California. The purpose of CEQA is to evaluate whether a proposed project may have an adverse effect on the environment and, if so, if that effect can be reduced or eliminated by pursuing an alternative course of action or through mitigation. CEQA is part of the Public Resources Code (PRC), Sections 21000 et seq.

The CEQA Guidelines are the regulations that govern the implementation of CEQA. The CEQA Guidelines are codified in the California Code of Regulations (CCR), Title 14, Chapter 3, Sections 15000 et seq. and are binding on state and local public agencies.

The basic goal of CEQA is to develop and maintain a high-quality environment now and in the future, while the specific goals of CEQA are for California's public agencies to:

1. Identify the significant environmental effects of their actions; and, either
2. Avoid those significant environmental effects, where feasible; or
3. Mitigate those significant environmental effects, where feasible.

CEQA applies to "projects" proposed to be undertaken or requiring approval by state and local public agencies. "Projects" are activities which have the potential to have a physical impact on the environment and may include the enactment of zoning ordinances, the issuance of conditional use permits and variances and the approval of tentative subdivision maps.

Where a project requires approvals from more than one public agency, CEQA requires one of these public agencies to serve as the "lead agency."

A "lead agency" must complete the environmental review process required by CEQA.

The most basic steps of the environmental review process are:

1. Determine if the activity is a "project" subject to CEQA;
2. Determine if the "project" is exempt from CEQA;
3. Perform an Initial Study to identify the environmental impacts of the project and determine whether the identified impacts are "significant". Based on its findings of "significance", the lead agency prepares one of the following environmental review documents:
  - Negative Declaration if it finds no "significant" impacts;
  - Mitigated Negative Declaration if it finds "significant" impacts but revises the project to avoid or mitigate those significant impacts;
  - Environmental Impact Report (EIR) if it finds "significant" impacts.

The purpose of an EIR is to provide State and local agencies and the general public with detailed information on the potentially significant environmental effects that a

proposed project is likely to have, to list ways that the significant environmental effects may be minimized and to indicate alternatives to the project.

Throughout this handout you will find references to various sections of the California Public Resources Code and the Code of Regulations. The various State statutes and regulations can all be accessed on-line at the following websites:

Statutes - <http://www.leginfo.ca.gov/calaw.html>

Regulations - <http://ccr.oal.ca.gov/>

This handout is intended to merely illustrate the process outlined in CEQA statute and guidelines relative to historical and cultural resources. These materials on CEQA and other laws are offered by the State Office of Historic Preservation for informational purposes only. This information does not have the force of law or regulation. This handout should not be cited in legal briefs as the authority for any proposition. In the case of discrepancies between the information provided in this handout and the CEQA statute or guidelines, the language of the CEQA statute and Guidelines (PRC § 21000 et seq. and 14 CCR § 15000 et seq.) is controlling. Information contained in this handout does not offer nor constitute legal advice. You should contact an attorney for technical guidance on current legal requirements.

## **QUESTIONS AND ANSWERS**

### **When does CEQA apply?**

Resources listed in, or determined to be eligible for listing in, the California Register are resources that must be given consideration in the CEQA process.

All projects undertaken by a public agency are subject to CEQA. This includes projects undertaken by any state or local agency, any special district (e.g., a school district), and any public college or university.

CEQA applies to discretionary projects undertaken by private parties. A discretionary project is one that requires the exercise of judgement or deliberation by a public agency in determining whether the project will be approved, or if a permit will be issued. Some common discretionary decisions include placing conditions on the issuance of a permit, delaying demolition to explore alternatives, or reviewing the design of a proposed project. Aside from decisions pertaining to a project that will have a direct physical impact on the environment, CEQA also applies to decisions that could lead to indirect impacts, such as making changes to local codes, policies, and general and specific plans. Judgement or deliberation may be exercised by the staff of a permitting agency or by a board, commission, or elected body.

CEQA does not apply to ministerial projects. A ministerial project is one that requires only conformance with a fixed standard or objective measurement and requires little or no personal judgment by a public official as to the wisdom or manner of carrying out the project. Generally ministerial permits require a public official to determine only that the project conforms with applicable zoning and building code requirements and that applicable fees have been paid. Some examples of projects that are generally ministerial include roof replacements, interior alterations to residences, and landscaping changes.

For questions about what types of projects are discretionary and ministerial within your community, you must contact your local government; usually the local Planning Department handles such issues.

### **What is the California Register and what does it have to do with CEQA?**

Historical resources are recognized as part of the environment under CEQA (PRC § 21002(b), 21083.2, and 21084.1). The California Register is an authoritative guide to the state's historical resources and to which properties are considered significant for purposes of CEQA.

The California Register includes resources listed in or formally determined eligible for listing in the National Register of Historic Places, as well as some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical resources inventory may be eligible for listing in the California Register and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise (PRC § 5024.1, 14 CCR § 4850).

The California Register statute (PRC § 5024.1) and regulations (14 CCR § 4850 et seq.) require that at the time a local jurisdiction *nominates* an historic resources survey for listing in the California Register, the survey must be updated if it is more than five years old. This is to ensure that a *nominated survey* is as accurate as possible at the time it is listed in the California Register. However, this does not mean that resources identified in a survey that is more than five years old need not be considered “historical resources” for purposes of CEQA. Unless a resource listed in a survey has been demolished, lost substantial integrity, or there is a preponderance of evidence indicating that it is otherwise not eligible for listing, a lead agency should consider the resource to be potentially eligible for the California Register.

However, a resource does not need to have been identified previously either through listing or survey to be considered significant under CEQA. In addition to assessing whether historical resources potentially impacted by a proposed project are listed or have been identified in a survey process, lead agencies have a responsibility to evaluate them against the California Register criteria prior to making a finding as to a proposed project’s impacts to historical resources (PRC § 21084.1, 14 CCR § 15064.5(3)).

### **Are archeological sites part of the California Register?**

An archeological site may be considered an historical resource if it is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California (PRC § 5020.1(j)) or if it meets the criteria for listing on the California Register (14 CCR § 4850).

CEQA provides somewhat conflicting direction regarding the evaluation and treatment of archeological sites. The most recent amendments to the CEQA Guidelines try to resolve this ambiguity by directing that lead agencies should first evaluate an archeological site to determine if it meets the criteria for listing in the California Register. If an archeological site is an historical resource (i.e., listed or eligible for listing in the California Register) potential adverse impacts to it must be considered, just as for any other historical resource (PRC § 21084.1 and 21083.2(l)).

If an archeological site is not an historical resource, but meets the definition of a “unique archeological resource” as defined in PRC § 21083.2, then it should be treated in accordance with the provisions of that section.

### **What is “substantial adverse change” to an historical resource?**

Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired (PRC § 5020.1(q)).

While demolition and destruction are fairly obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource’s significance.

### **How can “substantial adverse change” be avoided or mitigated?**

A project that has been determined to conform with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties* can generally be considered to be a project that will not cause a significant impact (14 CCR § 15126.4(b)(1)). In fact, in most cases if a project meets the *Secretary of Interior’s Standards for the Treatment of Historic Properties* it can be considered categorically exempt from CEQA (14 CCR § 15331).

Mitigation of significant impacts must lessen or eliminate the physical impact that the project will have on the historical resource. This is often accomplished through redesign of a project to eliminate objectionable or damaging aspects of the project (e.g., retaining rather than removing a character-defining feature, reducing the size or massing of a proposed addition, or relocating a structure outside the boundaries of an archeological site).

Relocation of an historical resource may constitute an adverse impact to the resource. However, in situations where relocation is the only feasible alternative to demolition, relocation may mitigate below a level of significance provided that the new location is compatible with the original character and use of the historical resource and the resource retains its eligibility for listing on the California Register (14 CCR § 4852(d)(1)).

In most cases the use of drawings, photographs, and/or displays does not mitigate the physical impact on the environment caused by demolition or destruction of an historical resource (14 CCR § 15126.4(b)). However, CEQA requires that all feasible mitigation be undertaken even if it does not mitigate below a level of significance. In this context,

recordation serves a legitimate archival purpose. The level of documentation required as a mitigation should be proportionate with the level of significance of the resource.

Avoidance and preservation in place are the preferable forms of mitigation for archeological sites. When avoidance is infeasible, a data recovery plan should be prepared which adequately provides for recovering scientifically consequential information from the site. Studies and reports resulting from excavations must be deposited with the California Historical Resources Regional Information Center (see list in Appendix G). Merely recovering artifacts and storing them does not mitigate impacts below a level of significance.

### **What are “exemptions” under CEQA and how are they used?**

There are basically two types of exemptions under CEQA: statutory and categorical. Statutory exemptions are projects specifically excluded from CEQA consideration as defined by the State Legislature. These exemptions are delineated in PRC § 21080 et seq. A statutory exemption applies to any given project that falls under its definition, regardless of the project’s potential impacts to the environment. However, it is important to note that any CEQA exemption applies only to CEQA and not, of course, to any other state, local or federal laws that may be applicable to a proposed project.

Categorical exemptions operate very differently from statutory exemptions. Categorical exemptions are made up of classes of projects that generally are considered not to have potential impacts on the environment. Categorical exemptions are identified by the State Resources Agency and are defined in the CEQA Guidelines (14 CCR § 15300-15331). Unlike statutory exemptions, categorical exemptions are not allowed to be used for projects that may cause a substantial adverse change in the significance of an historical resource (14 CCR § 15300.2(f)). Therefore, lead agencies must first determine if the project has the potential to impact historical resources and if those impacts could be adverse prior to determining if a categorical exemption may be utilized for any given project.

If it is determined that a statutory or categorical exemption could be used for a project, the lead agency may produce a notice of exemption, but is not required to do so. If a member of the public feels that a categorical exemption is being improperly used because the project could have a significant adverse impact on historical resources, it is very important that any appeals be requested and comments be filed making the case for the exemption’s impropriety. If a notice of exemption is filed, a 35-day statute of limitations will begin on the day the project is approved. If a notice is not filed, a 180-day statute of limitations will apply. As a result, lead agencies are encouraged to file notices of exemption to limit the possibility of legal challenge.

## **What are local CEQA Guidelines?**

Public agencies are required to adopt implementing procedures for administering their responsibilities under CEQA. These procedures include provisions on how the agency will process environmental documents and provide for adequate comment, time periods for review, and lists of permits that are ministerial actions and projects that are considered categorically exempt. Agency procedures should be updated within 120 days after the CEQA Guidelines are revised. The most recent amendments to the CEQA Guidelines occurred in November 1998 and included specific consideration of historical resources. An agency's adopted procedures are a public document (14 CCR § 15022).

Additionally, local governments will often produce materials for distribution to the public explaining the local CEQA process. The OHP strongly recommends the creation of such documents to further aid the public in understanding how CEQA is implemented within each local government's jurisdiction. Often a local historic preservation ordinance will also come into play in that process. In such instances, the OHP further recommends that the local ordinance procedures be explained in a straightforward public document. The materials distributed by the City of San Diego are included in this booklet in Appendix H as an example.

## **Who ensures CEQA is being followed properly?**

In a way, the people of California bear this responsibility. But, ultimately, it is the judicial system that ensures public agencies are fulfilling their obligations under CEQA. There is no CEQA "police" agency as many members of the public mistakenly assume. Rather it is any individual or organization's right to pursue litigation against a public agency that is believed to have violated its CEQA responsibilities.

Although the OHP can, and often does, comment on documents prepared for CEQA purposes (or the lack thereof), it is important that the public be aware that such comments are merely advisory and do not carry the force of law. Comments from state agencies and other organizations with proven professional qualifications and experience in a given subject can, however, provide valuable assistance to decision-makers as well as provide substantive arguments for consideration by a judge during CEQA litigation.

## **How should a citizen approach advocating for historical resources under CEQA?**

1. Familiarize yourself with CEQA. CEQA is a complex environmental consideration law, but the basics of it can be mastered with some concerted education. There is a large amount of information available on the subject of CEQA. Please refer to the following section of this publication for some suggested information sources.

Additionally, contact your local government and request a copy of their local CEQA guidelines as well as any public informational handouts they may have available.

Finally, familiarize yourself with the local codes related to historical resources. Find out if there is a local historic preservation ordinance that would serve to provide protection for the historical resource in question. If so, find out how the review process under that ordinance works. Research ways you can make your opinion heard through that process as well as the general CEQA environmental review process. Usually local ordinances will allow for greater protection for historical resources than CEQA's requirement of consideration. Therefore this is a very important step.

It cannot be emphasized enough the importance of educating yourself prior to an actual preservation emergency arising. CEQA puts in place very strict time controls on comment periods and statutes of limitations on litigation. These controls do not allow much time to learn CEQA in the heat of an impending project. It is far, far better to have at least a cursory understanding of CEQA and local codes related to historical resources well in advance of having to take on a preservation advocacy battle.

2. If and when there is an "action" or a "project" that would invoke CEQA, you should contact the local government undertaking the action. First rule, don't give up if you get shuffled from person to person. Stick with it. Ultimately, you want to get to the person in charge of the project (usually that's a planner in the Planning Department, but it might also be someone with Parks and Recreation, Public Works, Building and Safety, etc.). When you get to the right person, ask where they are in terms of CEQA compliance (using an exemption, preparing initial study or preparing CEQA document).

If the lead agency is using an exemption, ask if they have filed or intend to file a notice of exemption. If so, obtain a copy of it and move to step 3. If not, and you question the use of the exemption, investigate how you go about requesting an appeal of the decision and do so. Additionally, contact OHP to discuss submitting written comments. See step 4 for further information on ensuring your right to initiate litigation.

Once the initial study is finished, the lead agency should know what type of CEQA document they're going to prepare (negative declaration, , mitigated negative declaration, or environmental impact report). If the document has already been prepared, ask to have a copy mailed to you or ask where you can pick up a copy. If the document has not been prepared yet, ask to be placed on mailing list to receive a copy when it's done. If they don't keep a mailing list, then you need to keep an eye on the public postings board (usually at the Clerk's office) for when it does come out and then get a copy (some local governments also post on the internet, so you don't have to go in person or call in every week).

If the local government says they didn't do a CEQA document, ask why. Then call OHP to discuss where to go from there.

If the local government says that they prepared a CEQA document but the comment period on it is closed then there may not be much you can do (see litigation information in step 4); still, ask to have a copy of it sent to you. Then call OHP to discuss how best to proceed.

3. When you get a copy of the document, read it and call OHP to discuss. Then prepare your comments (don't dally, comment periods are usually for 45 days, but are sometimes only 30 days). Also, contact OHP as soon as possible to inform us when a document has come out so we can get a copy and comment on it as well. OHP does its best to respond to all citizens' requests for comments on CEQA documents. However, we cannot guarantee that we will be able to comment on a document with only a few days notice. Therefore, contacting us as soon as possible at the beginning of a comment period on a document, or, even better, prior to the release of the document, will help ensure that we are able to provide substantive written comments within the allotted time period.
4. Submit your comments and attend public hearings. Make sure all your concerns are on record (if the decision does go to litigation, the only thing the judge will be looking at is what's in the public record). Appeal any decision that doesn't go your way (you must exhaust all administrative remedies or your lawsuit—if it comes to that—won't be heard). Even if you do not intend to or want to initiate litigation, don't let the local government know that. You need to appear ready to take the matter to court, because often that's the only thing that will get their attention. If you know in advance that litigation will probably result, you should strongly consider hiring an attorney as early in the process as possible. An attorney will probably be able to provide much stronger arguments in commenting on the adequacy of a CEQA document than you as a member of the public would, and he or she can help ensure that your right to initiate litigation is protected.
5. Often you will find that CEQA doesn't provide you with a mechanism to protect a particular historical resource. This may be the case for a number of reasons, including that the project is private and ministerial (i.e., involves no discretion on the part of a public agency), is subject to a statutory exemption, or has been approved as a result of CEQA documents already having been prepared and circulated prior to your learning of the project. In these instances, you may find that a public relations campaign is your only recourse. In such situations, do not give up hope. There are many examples of citizens utilizing such means as the media, informational mailings and meetings, and dialogue with project developers to halt or alter a project even in the absence of legal remedies. This is an especially useful course of action when the proposed project involves a business that needs to build or retain a positive image in the minds of citizens in the local community in order to succeed.

## **What information is useful to have on hand when contacting OHP about a CEQA project?**

Information about the project:

- Where is the project located? City, county, street address.
- Is there a project name? Often having the project name will make it easier for OHP to find out more information about the project when we contact the lead agency.
- What does the project propose to do? Demolish, alter, relocate an historical resource? Build housing, commercial offices, retail?

Information about the historic property (or properties) potentially impacted:

- Where is the property located? City, county, and a street address
- What is its name? If the property has an historic name, or even what it is generally known as in the local community, it may be easier for us to locate information on it.
- What do you know about the property? Why do you think it's significant?

Lead agency contact information:

- Who is the lead agency for the project? That is, who is undertaking the project (if it's a public project) or permitting it (if it's a private project)? Ideally this should include both the name of the public agency as well as the department or division handling the project.
- Can you obtain a specific contact person's name? Do you have a phone number and/or email address for him or her?

Information on the development of the CEQA process thus far:

- What has the lead agency told you about the environmental review process so far?
- Do they know what type of CEQA document they're going to prepare?
- Have they already prepared one, and, if so, what is the public comment period on it?

Please refer to Appendix A for a sample form you can use to collect this information.

# CEQA INFORMATION SOURCES

## CEQA Statute and Guidelines

### California Resources Agency

The CEQA Statutes and Guidelines with Office of Planning and Research (OPR) commentary are available to download in Adobe Acrobat (PDF) format at the California Environmental Resources Evaluation System (CERES) website at <http://ceres.ca.gov/ceqa>. The Secretary of the Interior's Standards for Historic Preservation are also available at this website.

### Governor's Office of Planning and Research

*Statutes and Guidelines with OPR Commentary* (Sacramento: State Printing Office, June 1995).

Available through State Department of General Services, Publications Section PO Box 1015, North Highlands CA 95660. Orders should include title, stock number (7540-931-1022-0), number of copies, and remittance (\$18.00 per copy, includes UPS delivery). Make checks payable to State of California. No phone orders accepted.

### Consulting Engineers and Land Surveyors of California (CELSOC)

*California Environmental Quality Act/CEQA Guidelines*

This handy pocket edition is updated annually. Cost is \$6.50 for CELSOC members, \$9.50 for public agencies, and \$19.50 for non-members. Shipping is an additional \$3.00 and California residents must include sales tax at 7.25%. Available through CELSOC, 1303 J St, Ste 370, Sacramento CA 95814, phone: (916) 441-7991, fax: (916) 441-6312, email: [staff@celsoc.org](mailto:staff@celsoc.org), website: <http://www.celsoc.org>.

### State Office of Historic Preservation

*California State Law and Historic Preservation: Statutes, Regulations and Administrative Policies Regarding Historic Preservation and Protection of Cultural and Historical Resources*, 1999.

This complete compilation of all state codes, regulations and executive orders pertaining to historic preservation is available at no cost through the State Office of Historic Preservation, PO Box 942896, Sacramento CA 94296-0001, phone: (916) 653-6624, fax: (916) 653-9824, email: [calshpo@ohp.parks.ca.gov](mailto:calshpo@ohp.parks.ca.gov). It can be found on the internet at <http://ohp.parks.ca.gov/register/ts10ca.pdf>.

## Technical Assistance Publications and General Information

### Governor's Office of Planning and Research

*CEQA and Historical Resources*

*CEQA and Archaeological Resources*

*Circulation and Notice under CEQA*

*Thresholds of Significance: Criteria for Defining Environmental Significance*

This useful series of publications provides assistance in interpreting the CEQA statutes, guidelines and case law. It is available at no cost at <http://ceres.ca.gov/ceqa> or through the State Office of Historic Preservation (first two publications only) at the address and contact information above.

### Solano Press

*CEQA Deskbook: A Step-by-Step Guide on How to Comply with the California Environmental Quality Act*, Ronald Bass, Albert Herson, and Kenneth Bogdan (Point Arena: Solano Press Books).

A very handy guide, which is updated annually, to preparing and evaluating CEQA documents and understanding the CEQA process. Available through Solano Press Books, PO Box 773, Point Arena CA 95468, phone: (800) 931-9373, fax: (707) 884-4109, email: [spbooks@solano.com](mailto:spbooks@solano.com), website: <http://www.solano.com>.

### California Preservation Foundation

*The Preservationist's Guide to the California Environmental Quality Act*, Jack Rubens and Bill Delvac (Oakland: California Preservation Foundation, 1993).

The Guide is a step-by-step tour of CEQA requirements, useful case law and appropriate strategies you might use in your community. [Updated and expanded after the 1993 Annual Statewide Conference in Long Beach.] \$14. Available through the California Preservation Foundation, 1611 Telegraph Avenue, Suite 820, Oakland CA 94612, phone (510)763-0972, fax (510) 763-4724, email: [cpf\\_office@californiapreservation.org](mailto:cpf_office@californiapreservation.org), website: <http://www.californiapreservation.org>.

## Recent Case Law and CEQA Issues

### Solano Press

*Guide to the California Environmental Quality Act*, Michael Remy, Tina Thomas, et al. (Point Arena: Solano Press Books).

This publication is updated annually and provides general information as well as analysis of CEQA case law. Available through Solano Press Books at the address and contact information above.

## **California Resources Agency**

The CERES website at <http://ceres.ca.gov/ceqa> provides copies of recent CEQA decisions, 1995-1998.

## **Historic Preservation Advocacy**

### **National Trust for Historic Preservation (NTHP)**

*A Layperson's Guide to Preservation Law: Federal, State, and Local Laws Governing Historic Resources*

A look at the various laws and regulations that protect historic resources, as well as laws governing nonprofit organizations and museum properties.

Non-member \$10.00 / NTHP member \$9.00 / NT Forum \$7.50

*Organizing for Change*

Five in-depth case studies on how citizens worked through the political process to change preservation planning decisions.

Non-member \$6.00 / NTHP member \$5.40 / NT Forum \$4.50

*Rescuing Historic Resources: How to Respond to a Preservation Emergency*

The steps to take when faced with a preservation crisis.

Non-member \$6.00 / NTHP member \$5.40 / NT Forum \$4.50

The above titles represent only a few of the many publications the National Trust has available in its series of Historic Preservation Information Booklets. Each of these publications as well as other books, videos, and journals can be purchased through the National Trust's website at <http://www.nthp.org> or by calling (202) 588-6189.

### **California Preservation Foundation**

*A Preservationist's Guide to the Development Process*, edited by William F. Delvac, Christy McAvoy and Elizabeth Morton (Oakland: California Preservation Foundation, 1992).

This guide is based on CPF's popular 1992 workshop series. Chapters by statewide experts provide valuable overviews of the development process, real estate economics, tax credits, easements, property tax incentives, the State Historical Building Code, CEQA and more. \$12

*Avoiding the Bite: Strategies for Adopting and Retaining Local Preservation Programs*, edited by Lisa Foster (Oakland: California Preservation Foundation, 1994).

This book contains presentations made during CPF's 1994 workshops on preservation commissions. Includes sections on making allies in City Hall and with Redevelopment staff, maintaining programs in times of budget cuts, building public and political support for local preservation programs, and creating an adoptable ordinance. \$12

Both publications, as well as many others dealing with other preservation subjects, are available through the California Preservation Foundation, 1611 Telegraph Avenue, Suite 820, Oakland CA 94612, phone (510)763-0972, fax (510) 763-4724, email: [cpf\\_office@californiapreservation.org](mailto:cpf_office@californiapreservation.org), website: <http://www.californiapreservation.org>.

## **APPENDIX A: FORM FOR COLLECTION OF INFORMATION ABOUT A PROJECT**

The form that follows on the next page is intended to allow you to collect and have readily available pertinent information about a project both for your own personal use as well as for instances when you choose to contact OHP. Although it can readily be argued that collecting even more information is often useful, the attempt herein was to create an easily readable one-page form that can be quickly referenced for particularly pertinent information about a project.

**Project Information**

Project Name	
City/County Address (if applicable)	
Project Description	

**Historical Resources Information**

Name of Property	
Street Address	
City/County	
Property Description/ Significance	

**Lead Agency Information**

Lead Agency	
Contact Person	
Phone/Fax Email	
Mailing Address	
Other Agencies Involved (if applicable)	

**CEQA Process**

Document Type	
Comment Period	
Notes on Process	

**General Notes**

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## **APPENDIX B: STATE CODES AND REGULATIONS RELATED TO CEQA AND HISTORICAL RESOURCES**

### **California Public Resources Code**

#### **21083.2. Archeological Resources.**

(a) As part of the determination made pursuant to Section 21080.1, the lead agency shall determine whether the project may have a significant effect on archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources. An environmental impact report, if otherwise necessary, shall not address the issue of nonunique archaeological resources. A negative declaration shall be issued with respect to a project if, but for the issue of nonunique archaeological resources, the negative declaration would be otherwise issued.

(b) If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

- (1) Planning construction to avoid archaeological sites.
- (2) Deeding archaeological sites into permanent conservation easements.
- (3) Capping or covering archaeological sites with a layer of soil before building on the sites.
- (4) Planning parks, greenspace, or other open space to incorporate archaeological sites.

(c) To the extent that unique archaeological resources are not preserved in place or not left in an undisturbed state, mitigation measures shall be required as provided in this subdivision. The project applicant shall provide a guarantee to the lead agency to pay one-half the estimated cost of mitigating the significant effects of the project on unique archaeological resources. In determining payment, the lead agency shall give due consideration to the in-kind value of project design or expenditures that are intended to permit any or all archaeological resources or California Native American culturally significant sites to be preserved in place or left in an undisturbed state. When a final decision is made to carry out or approve the project, the lead agency shall, if necessary, reduce the specified mitigation measures to those which can be funded with the money guaranteed by the project applicant plus the money voluntarily guaranteed by any other person or persons for those mitigation purposes. In order to allow time for interested persons to provide the funding guarantee referred to in this subdivision, a final decision to carry out or approve a project shall not occur sooner than 60 days after completion of the recommended special environmental impact report required by this section.

(d) Excavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological resource if the lead agency determines that testing or studies already completed have adequately

recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report.

(e) In no event shall the amount paid by a project applicant for mitigation measures required pursuant to subdivision (c) exceed the following amounts:

(1) An amount equal to one-half of 1 percent of the projected cost of the project for mitigation measures undertaken within the site boundaries of a commercial or industrial project.

(2) An amount equal to three-fourths of 1 percent of the projected cost of the project for mitigation measures undertaken within the site boundaries of a housing project consisting of a single unit.

(3) If a housing project consists of more than a single unit, an amount equal to three-fourths of 1 percent of the projected cost of the project for mitigation measures undertaken within the site boundaries of the project for the first unit plus the sum of the following:

(A) Two hundred dollars (\$200) per unit for any of the next 99 units.

(B) One hundred fifty dollars (\$150) per unit for any of the next 400 units.

(C) One hundred dollars (\$100) per unit in excess of 500 units.

(f) Unless special or unusual circumstances warrant an exception, the field excavation phase of an approved mitigation plan shall be completed within 90 days after final approval necessary to implement the physical development of the project or, if a phased project, in connection with the phased portion to which the specific mitigation measures are applicable. However, the project applicant may extend that period if he or she so elects. Nothing in this section shall nullify protections for Indian cemeteries under any other provision of law.

(g) As used in this section, "unique archaeological resource" means 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 any 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.

(h) As used in this section, "nonunique archaeological resource" means an archaeological artifact, object, or site which does not meet the criteria in subdivision (g). A nonunique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects.

(i) As part of the objectives, criteria, and procedures required by Section 21082 or as part of conditions imposed for mitigation, a lead agency may make provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place.

(j) This section does not apply to any project described in subdivision (a) or (b) of Section 21065 if the lead agency elects to comply with all other applicable provisions of this division. This section does not apply to any project described in subdivision (c) of Section 21065 if the applicant and the lead agency jointly elect to comply with all other applicable provisions of this division.

(k) Any additional costs to any local agency as a result of complying with this section with respect to a project of other than a public agency shall be borne by the project applicant.

(l) Nothing in this section is intended to affect or modify the requirements of Section 21084 or 21084.1.

**21084. Guidelines shall list classes of projects exempt from Act.**

(e) No project that may cause a substantial adverse change in the significance of an historical resource, as specified in Section 21084.1, shall be exempted from this division pursuant to subdivision (a).

**21084.1. Historical Resources Guidelines.**

A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section.

## **California Code of Regulations, Title 14, Chapter 3**

**15064.5. Determining the Significance of Impacts to Archeological and Historical Resources**

(a) For purposes of this section, the term "historical resources" shall include the following:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource 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 an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, 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 to be an 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 California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 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; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

(3) Generally, 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 the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

(4) A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

(5) When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of environmental documents.

(c) CEQA applies to effects on archaeological sites.

(1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).

(2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.

(3) If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

(4) If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

(d) When an initial study identifies the existence of, or the probable likelihood, of Native American human remains within the project, a lead agency shall work with the appropriate native americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:

(1) The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).

(2) The requirements of CEQA and the Coastal Act.

(e) In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps should be taken:

(1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

(A) 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

(B) If the coroner determines the remains to be Native American:

1. The coroner shall contact the Native American Heritage Commission within 24 hours.

2. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased native american.

3. 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

(2) Where the following conditions occur, the landowner or his authorized representative 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.

(A) 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.

(B) The descendant identified fails to make a recommendation; or

(C) The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

(f) As part of the objectives, criteria, and procedures required by Section 21082 of the Public Resources Code, a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction. These provisions should include an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue on other parts of the building site while historical or unique archaeological resource mitigation takes place.

Note: Authority: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21083.2, 21084, and 21084.1, Public Resources Code; *Citizens for Responsible Development in West Hollywood v. City of West Hollywood* (1995) 39 Cal.App.4th 490.

#### **15126.4 Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects**

##### **(a) Mitigation Measures in General.**

(1) An EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy.

(A) The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR.

(B) Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.

(C) Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant. Examples of energy conservation measures are provided in Appendix F.

(D) If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed. (*Stevens v. City of Glendale*(1981) 125 Cal.App.3d 986.)

(2) Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design.

(3) Mitigation measures are not required for effects which are not found to be significant.

(4) Mitigation measures must be consistent with all applicable constitutional requirements, including the following:

(A) There must be an essential nexus (i.e. connection) between the mitigation measure and a legitimate governmental interest. *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987); and

(B) The mitigation measure must be "roughly proportional" to the impacts of the project. *Dolan v. City of Tigard*, 512 U.S. 374 (1994). Where the mitigation measure is an *ad hoc* exaction, it must be "roughly proportional" to the impacts of the project. *Ehrlich v. City of Culver City* (1996) 12 Cal.4th 854.

(5) If the lead agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed. Instead, the EIR may simply reference that fact and briefly explain the reasons underlying the lead agency's determination.

##### **(b) Mitigation Measures Related to Impacts on Historical Resources.**

(1) Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.

(2) In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur.

(3) Public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

(A) Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.

(B) Preservation in place may be accomplished by, but is not limited to, the following:

1. Planning construction to avoid archaeological sites;
2. Incorporation of sites within parks, greenspace, or other open space;
3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site.
4. Deeding the site into a permanent conservation easement.

(C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code.

(D) Data recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21002, 21003, 21100, and 21084.1, Public Resources Code; *Citizens of Goleta Valley v. Board of Supervisors*, (1990) 52 Cal.3d 553; *Laurel Heights Improvement Association v. Regents of the University of California*, (1988) 47 Cal.3d 376; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359; and *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112; *Sacramento Old City Assn. v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011.

### **15325. Transfers of Ownership of Interest In Land to Preserve Existing Natural Conditions and Historical Resources**

Class 25 consists of transfers of ownership in interests in land in order to preserve open space, habitat, or historical resources. Examples include but are not limited to:

(a) Acquisition, sale, or other transfer of areas to preserve existing natural conditions, including plant or animal habitats.

(b) Acquisition, sale, or other transfer of areas to allow continued agricultural use of the areas.

(c) Acquisition, sale, or other transfer to allow restoration of natural conditions, including plant or animal habitats.

(d) Acquisition, sale, or other transfer to prevent encroachment of development into flood plains.

(e) Acquisition, sale, or other transfer to preserve historical resources.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code; Reference: Section 21084, Public Resources Code.

### **15300.2 Exceptions**

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

### **15331. Historical Resource Restoration/Rehabilitation**

Class 31 consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer.

Note: Authority cited: Section 21083 and 21087, Public Resources Code. Reference: Section 21084, Public Resources Code.

## APPENDIX C: CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register was created by the State Legislature in 1992 and is intended to serve as an authoritative listing of significant historical and archeological resources in California. Additionally, the eligibility criteria for the California Register (codified in PRC § 5024.1 and further amplified in 14 CCR § 4852) are intended to serve as the definitive criteria for assessing the significance of historical resources for purposes of CEQA. In this way establishing a consistent set of criteria to the evaluation process for all public agencies statewide.

Resources can be nominated directly to the California Register or can be listed automatically as defined in PRC § 5024.1(d). Resources that are listed automatically in the California Register include:

- Resources listed in the National Register of Historic Places (this includes individual properties as well as historic districts and properties that contribute to the significance of an historic district);
- Resources that have been formally determined eligible for listing in the National Register of Historic Places (formal determinations of eligibility are made during federal review processes under Section 106 of the National Historic Preservation Act, during reviews conducted for projects taking advantage of the federal rehabilitation tax credits program, or when a private property being nominated for listing has been opposed by the property owner);
- California Historical Landmarks beginning with #770;
- California Points of Historical Interest beginning with those designated in January 1998 (the time at which the program was revised to reflect requirements for listing in the California Register).

For further information on applying and interpreting the California Register criteria, please refer to the handout entitled *California Register and National Register: A Comparison* and *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Both can be found online at [http://ohp.cal-parks.ca.gov/careqs/ts6ca\\_nat.htm](http://ohp.cal-parks.ca.gov/careqs/ts6ca_nat.htm) and [http://www.cr.nps.gov/nr/publications/bulletins/nr15\\_toc.htm](http://www.cr.nps.gov/nr/publications/bulletins/nr15_toc.htm), respectively.

## **Eligibility Criteria**

An historical resource must be significant 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
3. It embodies the distinctive characteristics of a type, period, region, or method or 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 to the prehistory or history of the local area, California, or the nation.

## **Integrity**

Integrity is the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

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 if it maintains the potential to yield significant scientific or historical information or specific data.

## Special Considerations

Moved buildings, structures, or objects The State Historical Resources Commission encourages the retention of historical resources on site and discourages the non-historic grouping of historic buildings into parks or districts. However, it is recognized that moving an historic building, structure, or object is sometimes necessary to prevent its destruction. Therefore, a moved building, structure, or object that is otherwise eligible may be listed in the California Register if it was moved to prevent its demolition at its former location and if the new location is compatible with the original character and use of the historical resource. An historical resource should retain its historic features and compatibility in orientation, setting, and general environment.

Historical resources achieving significance within the past fifty years In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.

Reconstructed buildings Reconstructed buildings are those buildings not listed in the California Register under the criteria stated above. A reconstructed building less than fifty years old may be eligible if it embodies traditional building methods and techniques that play an important role in a community's historically rooted beliefs, customs, and practices; e.g., a Native American roundhouse.

## **APPENDIX D: SECRETARY OF THE INTERIOR'S STANDARDS FOR PROFESSIONALS IN HISTORIC PRESERVATION**

The OHP recommends that public agencies seeking to contract with outside consultants to conduct evaluations of the significance of historical resources and proposed project impacts ensure that such consultants meet professional qualifications standards. In the absence of state promulgated standards for such professionals, it is recommended that public agencies consider adopting the standards put forward by the Secretary of the Interior.

In the September 29, 1983, issue of the Federal Register, the National Park Service published the following Professional Qualification Standards as part of the larger Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. These Professional Qualification Standards are in effect currently. Since 1983, the National Park Service has not issued any revisions for effect, although the National Park Service is in the process of drafting such revisions.

The following requirements are those used by the National Park Service, and have been previously published in the Code of Federal Regulations, 36 CFR Part 61. The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed, depending on the complexity of the task and the nature of the historic properties involved. In the following definitions, a year of full-time professional experience need not consist of a continuous year of full-time work but may be made up of discontinuous periods of full-time or part-time work adding up to the equivalent of a year of full-time experience.

### **History**

The minimum professional qualifications in history are a graduate degree in history or closely related field; or a bachelor's degree in history or closely related field plus one of the following:

1. At least two years of full-time experience in research, writing, teaching, interpretation, or other demonstrable professional activity with an academic institution, historical organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of history.

## **Archeology**

The minimum professional qualifications in archeology are a graduate degree in archeology, anthropology, or closely related field plus:

1. At least one year of full-time professional experience or equivalent specialized training in archeological research, administration or management;
2. At least four months of supervised field and analytic experience in general North American archeology; and
3. Demonstrated ability to carry research to completion.

In addition to these minimum qualifications, a professional in prehistoric archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the prehistoric period.

A professional in historic archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the historic period.

## **Architectural History**

The minimum professional qualifications in architectural history are a graduate degree in architectural history, art history, historic preservation, or closely related field, with coursework in American architectural history; or a bachelor's degree in architectural history, art history, historic preservation or closely related field plus one of the following:

1. At least two years of full-time experience in research, writing, or teaching in American architectural history or restoration architecture with an academic institution, historical organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history.

## **Architecture**

The minimum professional qualifications in architecture are a professional degree in architecture plus at least two years of full-time experience in architecture; or a State license to practice architecture.

## **Historic Architecture**

The minimum professional qualifications in historic architecture are a professional degree in architecture or a State license to practice architecture, plus one of the following:

1. At least one year of graduate study in architectural preservation, American architectural history, preservation planning, or closely related field; or

2. At least one year of full-time professional experience on historic preservation projects.

Such graduate study or experience shall include detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects.

## APPENDIX E: SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES

*The information contained in this appendix is provided solely for informational purposes due to the fact that the CEQA Guidelines make reference to the Secretary of the Interior's Standards for the Treatment of Historic Properties (14 CCR § 15064.5(b)(3), 15126.4(b)(1) and 15331). It is the responsibility of the lead agency under CEQA, not the OHP as is often mistakenly assumed, to assess whether or not a proposed project meets these standards, and it is the right of any individual or organization to offer comments relative to the findings of a lead agency regarding the application of these standards.*

*The following information is reprinted from the National Park Service's website. This information as well as additional publications, including the illustrated version of the standards and guidelines (which is referenced in the CEQA Guidelines), can be found on the internet at <http://www2.cr.nps.gov/tps/tpscat.htm>.*

Rooted in over 120 years of preservation ethics in both Europe and America, The Secretary of the Interior's Standards for the Treatment of Historic Properties are common sense principles in non-technical language. They were developed to help protect our nation's irreplaceable cultural resources by promoting consistent preservation practices. The Standards may be applied to all properties listed in the National Register of Historic Places: buildings, sites, structures, objects, and districts.

It should be understood that the Standards are a series of concepts about maintaining, repairing and replacing historic materials, as well as designing new additions or making alterations; as such, they cannot, in and of themselves, be used to make essential decisions about which features of a historic property should be saved and which might be changed. But once an appropriate treatment is selected, the Standards provide philosophical consistency to the work.

### Four Treatment Approaches

There are Standards for four distinct, but interrelated, approaches to the treatment of historic properties--preservation, rehabilitation, restoration, and reconstruction.

**Preservation** focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time. (Protection and Stabilization have now been consolidated under this treatment.)

**Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.

**Restoration** depicts a property at a particular period of time in its history, while removing evidence of other periods.

**Reconstruction** re-creates vanished or non-surviving portions of a property for interpretive purposes.

## Choosing an Appropriate Treatment

Choosing an appropriate treatment for a historic building or landscape, whether preservation, rehabilitation, restoration, or reconstruction is critical. This choice always depends on a variety of factors, including its historical significance, physical condition, proposed use, and intended interpretation.

The questions that follow pertain specifically to historic buildings, but the process of decisionmaking would be similar for other property types:

**Relative importance in history.** Is the building a nationally significant resource--a rare survivor or the work of a master architect or craftsman? Did an important event take place in it? National Historic Landmarks, designated for their "exceptional significance in American history," or many buildings individually listed in the National Register often warrant *Preservation* or *Restoration*. Buildings that contribute to the significance of a historic district but are not individually listed in the National Register more frequently undergo *Rehabilitation* for a compatible new use.

**Physical condition.** What is the existing condition--or degree of material integrity--of the building prior to work? Has the original form survived largely intact or has it been altered over time? Are the alterations an important part of the building's history? *Preservation* may be appropriate if distinctive materials, features, and spaces are essentially intact and convey the building's historical significance. If the building requires more extensive repair and replacement, or if alterations or additions are necessary for a new use, then *Rehabilitation* is probably the most appropriate treatment. These key questions play major roles in determining what treatment is selected.

**Proposed use.** An essential, practical question to ask is: Will the building be used as it was historically or will it be given a new use? Many historic buildings can be adapted for new uses without seriously damaging their historic character; special-use properties such as grain silos, forts, ice houses, or windmills may be extremely difficult to adapt to new uses without major intervention and a resulting loss of historic character and even integrity.

**Mandated code requirements.** Regardless of the treatment, code requirements will need to be taken into consideration. But if hastily or poorly designed, code-required

work may jeopardize a building's materials as well as its historic character. Thus, if a building needs to be seismically upgraded, modifications to the historic appearance should be minimal. Abatement of lead paint and asbestos within historic buildings requires particular care if important historic finishes are not to be adversely affected. Finally, alterations and new construction needed to meet accessibility requirements under the Americans with Disabilities Act of 1990 should be designed to minimize material loss and visual change to a historic building.

## **Standards for Preservation**

Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.

1. A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.
2. The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color, and texture.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

**Preservation as a Treatment.** When the property's distinctive materials, features, and spaces are essentially intact and thus convey the historic significance without extensive repair or replacement; when depiction at a particular period of time is not appropriate; and when a continuing or new use does not require additions or extensive alterations, Preservation may be considered as a treatment.

## **Standards for Rehabilitation**

Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in a such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

**Rehabilitation as a treatment.** When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate, Rehabilitation may be considered as a treatment.

## **Standards for Restoration**

Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

1. A property will be used as it was historically or be given a new use which reflects the property's restoration period.
2. Materials and features from the restoration period will be retained and preserved. The removal of materials or alteration of features, spaces, and spatial relationships that characterize the period will not be undertaken.
3. Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate and conserve materials and features from the restoration period will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
4. Materials, features, spaces, and finishes that characterize other historical periods will be documented prior to their alteration or removal.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the restoration period will be preserved.
6. Deteriorated features from the restoration period will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials.
7. Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.
8. chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
9. Archeological resources affected by a project will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
10. Designs that were never executed historically will not be constructed.

**Restoration as a treatment.** When the property's design, architectural, or historical significance during a particular period of time outweighs the potential loss of extant materials, features, spaces, and finishes that characterize other historical periods; when there is substantial physical and documentary evidence for the work; and when contemporary alterations and additions are not planned, Restoration may be considered as a treatment. Prior to undertaking work, a particular period of time, i.e., the restoration period, should be selected and justified, and a documentation plan for Restoration developed.

## **Standards for Reconstruction**

Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.

2. Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.
5. A reconstruction will be clearly identified as a contemporary re-creation.
6. Designs that were never executed historically will not be constructed.

**Reconstruction as a treatment.** When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site ); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, Reconstruction may be considered as a treatment.

# **APPENDIX F: A GUIDE TO PLANNING IN CALIFORNIA**

STATE OF CALIFORNIA  
Pete Wilson, Governor

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## **Introduction**

This is a citizen's guide to land use planning as it is practiced in California. Its purpose is to explain, in general terms, how local communities regulate land use and to define some commonly used planning terms. The booklet covers the following topics:

- State Law and Local Planning
- The General Plan
- Zoning
- Subdivisions
- Other Ordinances and Regulations
- Annexation and Incorporation
- The California Environmental Quality Act
- A Glossary of Planning Terms
- Bibliography

Cities and counties "plan" in order to identify important community issues (such as new growth, housing needs, and environmental protection), project future demand for services (such as sewer, water, roads, etc.), anticipate potential problems (such as overloaded sewer facilities or crowded roads), and establish goals and policies for directing and managing growth. Local governments use a variety of tools in the planning process including the general plan, specific plans, zoning, and the subdivision ordinance.

The examples to be discussed here represent common procedures or methods, but are by no means the only way of doing things. State law establishes a framework for local planning procedures, but cities and counties adopt their own unique responses to the issues they face. The reader is encouraged to consult the bibliography for more information on planning in general and to contact your local planning department for information on planning in your community.

## **State and Local Planning**

State law is the foundation for local planning in California. The California Government Code (Sections 65000 et seq.) contains many of the laws pertaining to the regulation of land uses by local governments including: the general plan requirement, specific plans, subdivisions, and zoning.

However, the State is seldom involved in local land use and development decisions; these have been delegated to the city councils and boards of supervisors of the individual cities and counties. Local decisionmakers have adopted their own sets of land use policies and regulations based upon the state laws.

### **Plan and Ordinances**

There are currently 456 incorporated cities and 58 counties in California. State law requires that each of these jurisdictions adopt "a comprehensive, long-term general plan for [its] physical development." This general plan is the official city or county policy regarding the location of housing, business, industry, roads, parks, and other land uses, protection of the public from noise and other environmental hazards, and for the conservation of natural resources. The legislative body of each city (the city council) and each county (the board of supervisors) adopts zoning, subdivision and other ordinances to regulate land uses and to carry out the policies of its general plan.

There is no requirement that adjoining cities or cities and counties have identical, or even similar, plans and ordinances. Cities and counties are distinct and independent political units. Each city, through its council and each county, through its supervisors, adopts its own general plan and development regulations. In turn, each of these governments is responsible for the planning decisions made within its jurisdiction.

### **Hearing Bodies**

In most communities, the city council or board of supervisors has appointed one or more hearing bodies to assist them with planning matters. The titles and responsibilities of these groups vary from place-to-place, so check with your local planning department regarding regulations in your area. Here are some of the more common types of hearing bodies and their usual responsibilities:

***The Planning Commission:*** considers general plan and specific plan amendments, zone changes, and major subdivisions.

**The Zoning Adjustment Board:** considers conditional use permits, variances, and other minor permits.

**Architectural Review or Design Review Board:** reviews projects to ensure that they meet community aesthetic standards. In some cities and counties, these bodies simply advise the legislative body on the proposals that come before them, leaving actual approval to the council or board of supervisors. More commonly, these bodies have the power to approve proposals, subject to appeal to the council or board of supervisors. These hearing bodies, however, do not have final say on matters of policy such as zone changes and general or specific plan amendments.

### **Hearings**

State law requires that local governments hold public hearings prior to most planning actions. At the hearing, the council or supervisors or advisory commission will explain the proposal, consider it in light of local regulations and environmental effects, and listen to testimony from interested parties. The council, board, or commission will vote on the proposal at the conclusion of the hearing.

Depending upon each jurisdiction's local ordinance, public hearings are not always required for minor land subdivisions, architectural or design review or ordinance interpretations. The method of advertising hearings may vary. Counties and general law cities publish notice of general plan adoption and amendment in the newspaper. Notice of zone change, conditional use permit, variance, and subdivision tracts is published in the newspaper and mailed to nearby property owners. Charter cities may have other notification procedures.

## **The General Plan**

### **The Blueprint**

The local general plan can be described as the city's or county's "blueprint" for future development. It represents the community's view of its future; a constitution made up of the goals and policies upon which the city council, board of supervisors, or planning commission will base their land use decisions. To illustrate its importance, all subdivisions, public works projects, and zoning decisions (except in charter cities other than Los Angeles) must be consistent with the general plan. If inconsistent, they must not be approved.

### **Long-Range Emphasis**

The general plan is not the same as zoning. Although both designate how land may be developed, they do so in different ways. The general plan and its diagrams have a long-term outlook, identifying the types of development that will be allowed, the spatial relationships among land uses, and the general pattern of future development. Zoning regulates present development through specific standards such as lot size, building setback, and a list of allowable uses. In counties and general law cities, the land uses

shown on the general plan diagrams will usually be reflected in the local zoning maps as well. Development must not only meet the specific requirements of the zoning ordinance, but also the broader policies set forth in the local general plan.

## **Contents**

State law requires that each city and each county adopt a general plan containing the following seven components or "elements": land use, circulation, housing, conservation, open-space, noise, and safety (Government Code Sections 65300 et seq.). At the same time, each jurisdiction is free to adopt a wide variety of additional elements covering subjects of particular interest to that jurisdiction such as recreation, urban design, or public facilities.

Most general plans consist of: (1) a written text discussing the community's goals, objectives, policies, and programs for the distribution of land use; and, (2) one or more diagrams or maps illustrating the general location of existing and future land uses. Figure 1 is an example of a general plan diagram.

Each local government chooses its own general plan format. The plan may be relatively short or long, one volume or ten volumes, depending upon local needs. Some communities, such as the City of San Jose, have combined the required elements into one document and most communities have adopted plans which consolidate the elements to some extent. State law requires that local governments make copies of their plans available to the public for the cost of reproduction.

## **Planning Issues**

Although state law establishes a set of basic issues for consideration in local general plans, each city and county determines the relative importance of each issue to local planning and decides how they are to be addressed in the general plan. As a result, no two cities or counties have plans which are exactly alike in form or content. Here is a summary of the basic issues, by element:

The **land use element** designates the general location and intensity of housing, business, industry, open space, education, public buildings and grounds, waste disposal facilities, and other land uses.

The **circulation element** identifies the general location and extent of existing and proposed major roads, transportation routes, terminals, and public utilities and facilities. It must be correlated with the land use element.

The **housing element** is a comprehensive assessment of current and projected housing needs for all economic segments of the community and region. It sets forth local housing policies and programs to implement those policies.

The **conservation element** addresses the conservation, development, and use of natural resources including water, forests, soils, rivers, and mineral deposits.

The ***open-space element*** details plans and measures for preserving open-space for natural resources, the managed production of resources, outdoor recreation, public health and safety, and the identification of agricultural land.

The ***noise element*** identifies and appraises noise problems within the community and forms the basis for distributing new noise-sensitive land uses.

The ***safety element*** establishes policies and programs to protect the community from risks associated with seismic, geologic, flood, and wildfire hazards.

### **Approving the Plan**

The process of adopting or amending a general plan encourages public participation. Cities and counties must hold public hearings for such proposals. Advance notice of the place and time of the hearing must be published in the newspaper or posted in the vicinity of the site proposed for change. Prior to approval, hearings will be held by the planning commission and the city council or board of supervisors.

### **Community and Specific Plans**

"Community plans" and "specific plans" are often used by cities and counties to plan the future of a particular area at a finer level of detail than that provided by the general plan. A community plan is a portion of the local general plan focusing on the issues pertinent to a particular area or community within the city or county. It supplements the policies of the general plan.

Specific plans describe allowable land uses, identify open space, and detail infrastructure availability and financing for a portion of the community. Specific plans implement, but are not technically a part of the local general plan. In some jurisdictions, specific plans take the place of zoning. Zoning, subdivision, and public works decisions must be in accordance with the specific plan.

## **Zoning**

The general plan is a long-range look at the future of the community. A zoning ordinance is the local law that spells out the immediate, allowable uses for each piece of property within the community. In all counties, general law cities, and the city of Los Angeles, zoning must comply with the general plan. The purpose of zoning is to implement the policies of the general plan.

### **Zones**

Under the concept of zoning, various kinds of land uses are grouped into general categories or "zones" such as single-family residential, multi-family residential, neighborhood commercial, light industrial, agricultural, etc. A typical zoning ordinance describes 20 or more different zones which may be applied to land within the community. Each piece of property in the community is assigned a zone listing the kinds of uses that will be allowed on that land and setting standards such as minimum lot size, maximum building height, and minimum front yard depth. The distribution of residential,

commercial, industrial, and other zones will be based on the pattern of land uses established in the community's general plan. Maps are used to keep track of the zoning for each piece of land.

Zoning is adopted by ordinance and carries the weight of local law. Land may be put only to those uses listed in the zone assigned to it. For example, if a commercial zone does not allow five-story office buildings, then no such building could be built on the lands which have been assigned that zone. A zoning ordinance has two parts: (1) a precise map or maps illustrating the distribution of zones within the community; and, (2) a text which both identifies the specific land uses allowed within each of those zones and sets forth development standards.

### **Rezoning**

The particular zone determines the uses to which land may be put. If a landowner proposes a use that is not allowed in the zone, the city or county must approve a rezoning (change in zone) before development of that use can begin. The local planning commission and the city council or county board of supervisors must hold public hearings before property may be rezoned. The hearings must be advertised in advance. The council or board is not obligated to approve requests for rezoning and, except in charter cities, must deny such requests when the proposed zone conflicts with the general plan.

### **Overlay Zones**

In addition to the zoning applied to each parcel of land, many cities and counties use "overlay zones" to further regulate development in areas of special concern. Lands in historic districts, downtowns, floodplains, near earthquake faults or on steep slopes are often subject to having additional regulations "overlain" upon the basic zoning requirements. For example, a lot that is within a single-family residential zone and also subject to a steep-slope overlay zone, must meet the requirements of both zones when it is developed.

### **Prezoning**

Cities may "prezone" lands located within the surrounding county in the same way that they approve zoning. Prezoning is usually done before annexation of the land to the city in order to facilitate its transition into the city boundaries. Prezoning does not change the allowable uses of the land nor the development standards until such time as the site is officially annexed to the city. Likewise, land that has been pre-zoned continues to be subject to county zoning regulations until annexation is completed.

### **Variances**

A variance is a limited waiver of development standards. The city or county may grant a variance in special cases where: (1) application of the zoning regulations would deprive property of the uses enjoyed by nearby, similarly zoned lands; and (2) restrictions have been imposed to ensure that the variance will not be a grant of special privilege. A city or county may not grant a variance that would permit a use that is not otherwise allowed in that zone (for example, a commercial use could not be approved in a residential zone

by variance). Typically, variances are considered when the physical characteristics of the property make it difficult to develop. For instance, in a situation where the rear half of a lot is a steep slope, a variance might be approved to allow the house being built to be closer to the street than usually allowed. Variance requests require a public hearing and neighbors are given the opportunity to testify. The local hearing body then decides whether to approve or deny the variance.

### **Conditional Use Permits**

Most zoning ordinances identify certain land uses which do not precisely fit into existing zones, but which may be allowed upon approval of a conditional use permit (sometimes called a special use permit or a CUP) at a public hearing. These might include community facilities (such as hospitals or schools), public buildings or grounds (such as fire stations or parks), temporary or hard-to-classify uses (such as Christmas tree sales or small engine repair), or land uses with potentially significant environmental impacts (hazardous chemical storage or building a house in a floodplain). The local zoning ordinance specifies those uses for which a conditional use permit may be requested, which zones they may be requested in, and the public hearing procedure. If the local planning commission or zoning board approves the use, it will usually do so subject to certain conditions being met by the permit applicant. Alternatively, it may deny uses which do not meet local standards.

## **Subdivisions**

In general, land cannot be divided in California without local government approval. Dividing land for sale, lease or financing is regulated by local ordinances based on the State Subdivision Map Act (commencing with Government Code Section 66410). The local general plan, zoning, subdivision, and other ordinances govern the design of the subdivision, the size of its lots, and the types of improvements (street construction, sewer lines, drainage facilities, etc.). In addition, the city or county may impose a variety of fees upon the subdivision, depending upon local and regional needs, such as school impact fees, park dedications, etc. Contact your local planning department for information on local requirements and procedures.

### **Subdivision Types**

There are basically two types of subdivisions: parcel maps, which are limited to divisions resulting in fewer than five lots (with certain exceptions), and final map subdivisions (also called tract maps), which apply to divisions resulting in five or more lots. Applications for both types of subdivisions must be submitted to the local government for consideration in accordance with the local subdivision ordinance and the Subdivision Map Act.

### **Processing**

Upon receiving an application for a subdivision map, the city or county staff will examine the design of the subdivision to ensure that it meets the requirements of the general plan, the zoning ordinance, and the subdivision ordinance. An environmental impact

analysis must be prepared and a public hearing held prior to approval of a tentative tract map. Parcel maps may also be subject to a public hearing, depending upon the requirements of the local subdivision ordinance.

### **Final Approval**

Approval of a subdivision map generally means that the subdivider will be responsible for installing improvements such as streets, drainage facilities or sewer lines to serve the subdivision. These improvements must be installed or secured by bond before the city or county will grant final approval of the map and allow the subdivision to be recorded in the county recorder's office. Lots within the subdivision cannot be sold until the map has been recorded. The subdivider has at least two years (and depending upon local ordinance, usually more) in which to comply with the improvement requirements, gain final administrative approval, and record the final map. Parcel map requirements may vary dependent upon local ordinance requirements.

## **Other Ordinances and Regulations**

Cities and counties often adopt other ordinances besides zoning and subdivision to protect the general health, safety, and welfare of their inhabitants. Contact your local planning department for information on the particular ordinances in effect in your area. Common types include: flood protection, historic preservation, design review, hillside development control, growth management, impact fees, traffic management, and sign control.

Local ordinances may also be adopted in response to state requirements. Examples include: Local Coastal Programs (California Coastal Act); surface mining regulations (Surface Mining and Reclamation Act); earthquake hazard standards (Alquist-Priolo Special Studies Zone Act); and hazardous material disclosure requirements. These regulations are generally based on the applicable state law.

## **Annexation and Incorporation**

### **The LAFCO**

Annexation (the addition of territory to an existing city) and incorporation (creation of a new city) are controlled by the Local Agency Formation Commission (LAFCO) established in each county by the state's Cortese-Knox Act (commencing with Government Code Section 56000). The commission is made up of elected officials from the county, cities, and, in some cases, special districts. LAFCO duties include: establishing the "spheres of influence" that designate the ultimate service areas of cities and special districts; studying and approving requests for city annexations; and, studying and approving proposals for city incorporations. Below is a very general discussion of annexation and incorporation procedures. For detailed information on this complex subject, contact your county LAFCO.

### **Annexation**

When the LAFCO receives an annexation request, it will convene a hearing to determine the worthiness of the proposal and may deny or conditionally approve the request based on the policies of the LAFCO and state law. Annexation requests which receive tentative approval are delegated to the affected city for hearings and, if necessary, an election. Annexations which have been passed by vote of the inhabitants or which have not been defeated by protest (in cases where no election was required) must be certified by the LAFCO as to meeting all its conditions before they become final. It is the LAFCO, not the city, that is ultimately responsible for the annexation process.

### **Incorporation**

When the formation of a new city is proposed, the LAFCO studies the economic feasibility of the proposed city, its impact on county and special districts, and the provision of public services. If the feasibility of the proposed city cannot be shown, the LAFCO can terminate the proceedings. If the proposed city appears to be feasible, LAFCO will refer the proposal to the county board of supervisors for hearing along with a set of conditions to be met upon to incorporation. If the supervisors do not receive protests from a majority of the involved voters, an election will be held to create the city and elect city officials.

## **The California Environmental Quality Act (CEQA)**

The California Environmental Quality Act (commencing with Public Resources Code Section 21000) requires local and state governments to consider the potential environmental effects of a project before deciding whether to approve it or not. CEQA's purpose is to disclose the potential impacts of a project, suggest methods to minimize those impacts, and discuss alternatives to the project so that decision makers will have full information upon which to base their decision. CEQA is a complex law with a great deal of subtlety and local variation.

The following discussion is *extremely* general. The basic requirements and administrative framework for local governments' CEQA responsibilities are described in the *California Environmental Quality Act: Law and Guidelines*. For more information, readers should contact their local planning department or refer to the CEQA listings in the bibliography.

### **Lead Agency**

The "lead agency" is responsible for seeing that environmental review is done in accordance with CEQA and that environmental analyses are prepared when necessary. The agency with the principal responsibility for issuing permits to a project (or for carrying out the project) is deemed to be the "lead agency". As lead agency, it may prepare the environmental analysis itself or it may contract for the work to be done under its direction. In practically all local planning matters (such as rezoning, conditional use permits, and specific plans) the planning department is the lead agency.

## **Analysis**

Analyzing a project's potential environmental effect is a multistep process. Many minor projects are exempt from the CEQA requirements. These include single-family homes, remodeling, accessory structures, and some lot divisions (for a complete list refer to *California Environmental Quality Act: Law and Guidelines*). No environmental review is required when a project is exempt from CEQA.

When a project is subject to review under CEQA, the lead agency prepares an "initial study" to assess the potential adverse physical impacts of the proposal. When the project will not cause a "significant" impact on the environment or when it has been revised to eliminate all such impacts, a "negative declaration" is prepared. The negative declaration describes why the project will not have a significant impact and may require that the project incorporate a number of measures ensuring that there will be no such impact. If significant environmental effects are identified, then an Environmental Impact Report (EIR) must be written before the project can be considered by decision makers.

## **The EIR**

An EIR discusses the proposed project, its environmental setting, its probable impacts, realistic means of reducing or eliminating those impacts, its cumulative effects, and alternatives to the project. CEQA requires that Negative Declarations and EIRs be made available for review by the public and other agencies prior to consideration of the project. The review period allows concerned citizens and agencies to comment on the completeness and adequacy of the environmental review prior to its completion. When the decision making body (the city council, board of supervisors, or other board or commission) approves a project, it must certify the adequacy of the environmental review. If its decision to approve a project will result in unavoidable significant impacts, the decision making body must state, in writing, its overriding reasons for granting the approval and how the impacts are to be addressed.

An EIR is an informational document. It does not, in itself, approve or deny a project. Environmental analysis must be done as early as possible in the process of considering a project and must address the entire project. There are several different types of EIRs that may be prepared, depending upon the project. They are described in the *California Environmental Quality Act: Law and Guidelines* written by the Governor's Office of Planning and Research and the Resources Agency.

## **Glossary**

*These are some commonly used planning terms. This list includes several terms that are not discussed in this booklet.*

### **Board of Supervisors**

A county's legislative body. Board members are elected by popular vote and are responsible for enacting ordinances, imposing taxes, making appropriations, and

establishing county policy. The board adopts the general plan, zoning, and subdivision regulations.

### **CEQA**

The California Environmental Quality Act (commencing with Public Resources Code Section 21000). In general, CEQA requires that all private and public projects be reviewed prior to approval for their potential adverse effects upon the environment.

### **Charter City**

A city which has been incorporated under its own charter rather than under the general laws of the state. Charter cities have broader powers to enact land use regulations than do general law cities.

### **City Council**

A city's legislative body. The popularly elected city council is responsible for enacting ordinances, imposing taxes, making appropriations, establishing policy, and hiring some city officials. The council adopts the local general plan, zoning, and subdivision ordinance.

### **COG**

Council of Governments. There are 25 COGs in California made up of elected officials from member cities and counties. COGs are regional agencies concerned primarily with transportation planning and housing; they do not directly regulate land use.

### **Community Plan**

A portion of the local general plan that focuses on a particular area or community within the city or county. Community plans supplement the policies of the general plan.

### **Conditional Use Permit**

Pursuant to the zoning ordinance, a conditional use permit (CUP) may authorize uses not routinely allowed on a particular site. CUPs require a public hearing and if approval is granted, are usually subject to the fulfillment of certain conditions by the developer. Approval of a CUP is not a change in zoning.

### **Density Bonus**

An increase in the allowable number of residences granted by the city or county in return for the project's providing low- or moderate-income housing (see Government Code Section 65915).

### **Design Review Committee**

A group appointed by the city council to consider the design and aesthetics of development within design review zoning districts.

### **Development Fees**

Fees charged to developers or builders as a prerequisite to construction or development approval. The most common are: (1) impact fees (such as parkland acquisition fees,

school facilities fees, or street construction fees) related to funding public improvements which are necessitated in part or in whole by the development; (2) connection fees (such as water line fees) to cover the cost of installing public services to the development; (3) permit fees (such as building permits, grading permits, sign permits) for the administrative costs of processing development plans; and, (4) application fees (rezoning, CUP, variance, etc.) for the administrative costs of reviewing and hearing development proposals.

### **Downzone**

This term refers to the rezoning of land to a more restrictive zone (for example, from multi-family residential to single-family residential or from residential to agricultural).

### **EIR**

Environmental Impact Report. A detailed review of a proposed project, its potential adverse impacts upon the environment, measures that may avoid or reduce those impacts, and alternatives to the project.

### **Final Map Subdivision**

Final map subdivisions (also called tract maps or major subdivisions) are land divisions which create five or more lots. They must be consistent with the general plan and are generally subject to stricter requirements than parcel maps. Such requirements may include installing road improvements, the construction of drainage and sewer facilities, parkland dedications, and more.

### **Floor Area Ratio**

Abbreviated as FAR, this is a measure of development intensity. FAR is the ratio of the amount of floor area of a building to the amount of area of its site. For instance, a one-story building that covers an entire lot has an FAR of 1. Similarly, a one-story building that covers 1/2 of a lot has an FAR of 1/2.

### **General Law City**

A city incorporated under and run in accordance with the general laws of the state.

### **General Plan**

A statement of policies, including text and diagrams setting forth objectives, principles, standards, and plan proposals, for the future physical development of the city or county (see Government Code Sections 65300 et seq.).

### **"Granny" Housing**

Typically, this refers to a second dwelling attached to or separate from the main residence that houses one or more elderly persons. California Government Code 65852.1 enables cities and counties to approve such units in single-family neighborhoods.

### **Impact Fees**

*See Development Fees.*

**Infrastructure**

A general term describing public and quasi-public utilities and facilities such as roads, bridges, sewers and sewer plants, water lines, power lines, fire stations, etc.

**Initial Study**

Pursuant to CEQA, an analysis of a project's potential environmental effects and their relative significance. An initial study is preliminary to deciding whether to prepare a negative declaration or an EIR.

**Initiative**

A ballot measure which has been placed on the election ballot as a result of voter signatures and which addresses a legislative action. At the local level, initiatives usually focus on changes or additions to the general plan and zoning ordinance. The right to initiative is guaranteed by the California Constitution.

**LAFCO**

Local Agency Formation Commission. The Cortese-Knox Act (commencing with Government Code Section 56000) establishes a LAFCO made up of elected officials of the county, cities, and, in some cases, special districts in each county. LAFCOs establish spheres of influence for all the cities and special districts within the county. They also administer incorporation and annexation proposals.

**Mitigation Measure**

The California Environmental Quality Act requires that when an environmental impact or potential impact is identified, measures must be proposed that will eliminate, avoid, rectify, compensate for or reduce those environmental effects.

**Negative Declaration**

When a project is not exempt from CEQA and will not have a significant effect upon the environment a negative declaration must be written. The negative declaration is an informational document that describes the reasons why the project will not have a significant effect and proposes measures to mitigate or avoid any possible effects.

**Overlay Zone**

A set of zoning requirements that is superimposed upon a base zone. Overlay zones are generally used when a particular area requires special protection (as in a historic preservation district) or has a special problem (such as steep slopes, flooding or earthquake faults). Development of land subject to overlay zoning requires compliance with the regulations of both the base and overlay zones.

**Parcel Map**

A minor subdivision resulting in fewer than five lots. The city or county may approve a parcel map when it meets the requirements of the general plan and all applicable ordinances. The regulations governing the filing and processing of parcel maps are found in the state Subdivision Map Act and the local subdivision ordinance.

**Planned Unit Development (PUD)**

Land use zoning which allows the adoption of a set of development standards that are specific to the particular project being proposed. PUD zones usually do not contain detailed development standards; these are established during the process of considering the proposals and adopted by ordinance if the project is approved.

**Planning Commission**

A group of residents appointed by the city council or board of supervisors to consider land use planning matters. The commission's duties and powers are established by the local legislative body and might include hearing proposals to amend the general plan or rezone land, initiating planning studies (road alignments, identification of seismic hazards, etc.), and taking action on proposed subdivisions.

**Referendum**

A ballot measure challenging a legislative action by the city council or county board of supervisors. Referenda petitions must be filed before the action becomes final and may lead to an election on the matter. The California Constitution guarantees the right to referendum.

**School Impact Fees**

Proposition 13 put a limit on property taxes and thereby limited the main source of funding for new school facilities. California law allows school districts to impose fees on new developments to offset their impacts of area schools.

**Setback**

A minimum distance required by zoning to be maintained between two structures or between a structure and property lines.

**Specific Plan**

A plan addressing land use distribution, open space availability, infrastructure, and infrastructure financing for a portion of the community. Specific plans put the provisions of the local general plan into action (see Government Code Sections 65450 et seq.).

**Tentative Map**

The map or drawing illustrating a subdivision proposal. The city or county will approve or deny the proposed subdivision based upon the design depicted by the tentative map. A subdivision is not complete until the conditions of approval imposed upon the tentative map have been satisfied and a final map has been certified by the city or county and recorded with the county recorder.

**Tract Map**

*See final map subdivision.*

**Transportation Systems Management (TSM)**

A transportation plan that coordinates many forms of transportation (car, bus, carpool, rapid transit, bicycle, walking, etc.) in order to distribute the traffic impacts of new development. Rather than emphasizing road expansion or construction (as does traditional transportation planning), TSM examines methods of increasing the efficiency of road use.

### **Variance**

A limited waiver from the requirements of the zoning ordinance. Variance requests are subject to public hearing, usually before a zoning administrator or board of zoning adjustment. Variances may only be granted under special circumstances.

### **Zoning**

Local codes regulating the use and development of property. The zoning ordinance divides the city or county into land use districts or "zones", represented on zoning maps, and specifies the allowable uses within each of those zones. It establishes development standards such as minimum lot size, maximum height of structures, building setbacks, and yard size.

### **Zoning Adjustment Board**

A group appointed by the local legislative body to consider minor zoning adjustments such as conditional use permits and variances. It is empowered to conduct public hearings and to impose conditions of approval. Its decisions may be appealed to the local legislative body.

### **Zoning Administrator**

A planning department staff member responsible for hearing minor zoning permits. Typically, the zoning administrator considers variances and conditional use permits and may interpret the provisions of the zoning ordinance when questions arise. His/her decision may be appealed to the local legislative body.

## **Bibliography: A Few Good Books**

*The reader is encouraged to refer to the following books for a better understanding of planning in California.*

**Alternative Techniques for Controlling Land Use: A Guide to Small Cities and Rural Areas in California**, by Irving Schiffman (University Center for Economic Development and Planning, California State University, Chico) 1982, revised 1989. *This book discusses, in detail, concepts such as hillside development standards, planned unit development, and specific plans.*

**California Environmental Quality Act: Statutes and Guidelines** (Governor's Office of Planning and Research, Sacramento, California) 1996, 301 pp. The CEQA Guidelines describe the requirements for evaluating environmental impacts. Out of Print, check in the government documents section of your local library.

**California Land Use and Planning Law**, by Daniel J. Curtin Jr., (Solano Press, Pt. Arena, California) revised annually. A look at the planning, zoning, subdivision, and environmental quality laws that is illustrated by references to numerous court cases.

**The General Plan Guidelines** (Governor's Office of Planning and Research, Sacramento, California) 1987, 368 pp. *The Guidelines discuss local planning activities and how to write or revise a general plan.*

**Guide to California Government**, (League of Women Voters of California, Sacramento, California) 13th Edition, 1986, 167 pp. An excellent summary of the processes of local and state government.

**Guide to the Cortese/Knox Local Government Reorganization Act of 1985**, by the Assembly Local Government Committee (Joint Publications Office, Sacramento, California), 1985, 228 pp. A compilation of the law that authorizes annexations and other local government reorganizations. It contains a flowchart illustrating the annexation process.

**Planning Commission Handbook** (League of California Cities, Sacramento, California) 1984. A well-written overview of the role of the planning commission and California planning law.

**Subdivision Map Act Manual**, by Daniel J. Curtin, Jr., (Solano Press, Pt. Arena, California), revised annually. A practitioner's guide to the Map Act, including pertinent legal precedents.

**Your Guide to Open Meetings, The Ralph M. Brown Act**, by the Senate Local Government Committee (Joint Publications Office, Sacramento, California), 1989. An easy to read explanation of the state's open meeting laws and the responsibilities of local government with regard to public meetings.

## APPENDIX G: INFORMATION CENTER CONTACT LIST

The following institutions are under agreement with the Office of Historic Preservation to:

1. Integrate information on new Resources and known Resources into the California Historical Resources Information System.
2. Supply information on resources and surveys to government, institutions, and individuals who have a need to know.
3. Supply a list of consultants qualified to do historic preservation fieldwork within their area.

COORDINATOR: John Thomas, Historian II, (916) 653-9125

### Northwest Information Center

Counties: **Alameda, Colusa, Contra Costa, Lake, Marin, Mendocino, Monterey, Napa, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Solano, Sonoma, Yolo**

Ms. Leigh Jordan, Coordinator  
Sonoma State University, 1801 East Cotati Ave, Rohnert Park CA 94928  
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nwic@sonoma.edu

### Northeast Information Center

Counties: **Butte, Glenn, Lassen, Modoc, Plumas, Shasta, Sierra, Siskiyou, Sutter, Tehama, Trinity**

Dr. Frank Bayham, Interim Coordinator  
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California State University, Chico CA  
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### North Central Information Center

Counties: **Amador, El Dorado, Nevada, Placer, Sacramento, Yuba**

Dr. Christopher Castaneda, Coordinator, Dr.  
Terry Castaneda, Coordinator  
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95819-6106

Attn: David McCullough  
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ncic@csus.edu

### Central California Information Center

Counties: **Alpine, Calaveras, Mariposa, Merced, San Joaquin, Stanislaus, Tuolumne**

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University, 801 W Monte Vista Ave, Turlock  
CA 95382  
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egreatho@toto.csustan.edu

### Central Coastal Information Center

Counties: **San Luis Obispo, Santa Barbara**

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byoshida@umail.ucsb.edu

### Southern San Joaquin Valley Information Center

Counties: **Fresno, Kern, Kings, Madera, Tulare**

Dr. Robert Yohe, Coordinator  
California State University, 9001 Stockdale  
Hwy, Bakersfield CA 93311-1099

Attn: Adele Baldwin  
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abaldwin@csubak.edu;  
<http://www.csubak.edu/ssjvic>

San Bernardino Archeological Information Center

Counties: **San Bernardino**

Robin Laska, Acting Coordinator  
San Bernardino County Museum, 2024  
Orange Tree Ln, Redlands CA 92374  
(909) 307-2669 ext. 255, Fax (909) 307-0539  
rlaska@sbcm.co.san-bernardino.ca.us

South Central Coastal Information Center  
Counties: **Los Angeles, Orange, Ventura**

Margaret Lopez, Coordinator  
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Anthropology, 800 N State College Blvd,  
PO Box 6846, Fullerton CA 92834-6846  
(714) 278-5395, Fax (714) 278-5542  
sccic@fullerton.edu,  
<http://anthro.fullerton.edu/sccic.html>

Eastern Information Center

Counties: **Inyo, Mono, Riverside**

Dr. M. C. Hall, Coordinator  
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California, Riverside CA 92521-0418  
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South Coastal Information Center

Counties: **San Diego**

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<http://ssrl.sdsu.edu/scic/scic.html>

Southeast Information Center

Counties: **Imperial**

Mr. Jay von Werlhof, Coordinator  
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Box 430, Ocotillo CA 92259  
physical location: 11 Frontage Rd  
Attn: Karen Collins  
(760) 358-7016, FAX (760) 358-7827  
ivcdm@imperial.cc.ca.us

North Coastal Information Center

Counties: **Del Norte, Humboldt**

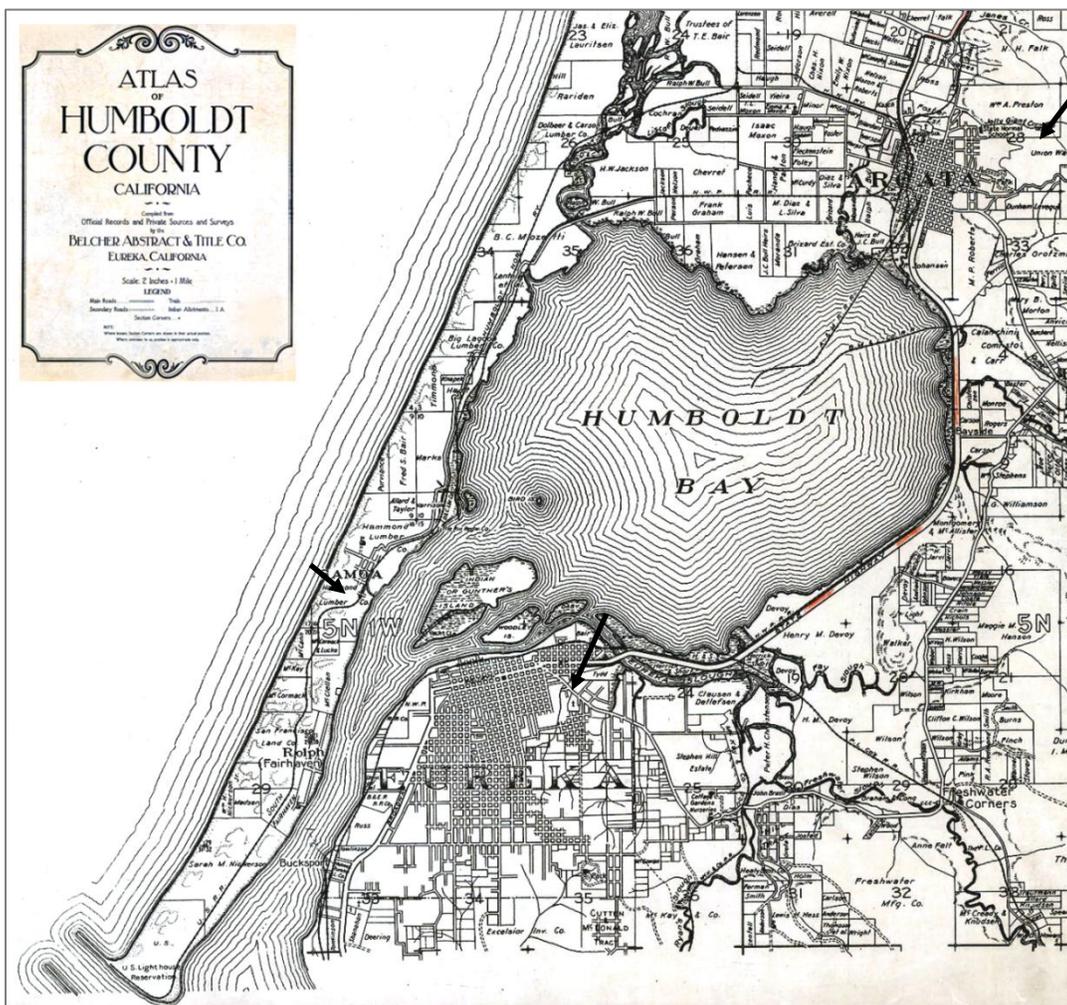
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## **APPENDIX H: CITY OF SAN DIEGO SAMPLE INFORMATION**

The information contained in this appendix is included as an illustration of the type of materials that are often distributed by local governments throughout California concerning their management of their CEQA responsibilities. For those readers who are preservation advocates, we would suggest you inquire with your local government as to the availability of such explanatory documents. For those readers who represent local governments that don't distribute such useful documents, we suggest you consider developing such guidance as the City of San Diego has produced.

## **APPENDIX I: STATE CLEARINGHOUSE HANDBOOK**

**APPENDIX C: BELCHER ATLAS OF HUMBOLDT COUNTY, CALIFORNIA,  
NORTH BAY SECTION**



North Bay and Peninsula (1921-22), approximate locations of Case Studies 1 through 3.

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<http://library.humboldt.edu/humco/holdings/belcher.htm>