

8 CULTURAL RESOURCES

This section describes the existing cultural resources of the PCGC campus, which includes archeological resources, tribal cultural resources, and historic resources. This section also identifies regulatory requirements associated with the evaluation and treatment of cultural resources, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Placer County Government Center (PCGC) Master Plan Update (project), including construction of the proposed Health and Human Services building and the Multifamily Residential project located at 1st Street and B Avenue.

Several of the comment letters received in response to the Notice of Preparation for this EIR address cultural resources, recommending that the County of Placer (County) consider preservation and adaptive reuse of the remaining buildings within the DeWitt General Hospital Historic District, with specific suggestions to retain and reuse the theater and auditorium. The Notice of Preparation and comments received in response to it are provided in Appendix A.

Information in this chapter is summarized from prior cultural resources evaluations prepared for the PCGC property, the DeWitt Government Center Facility Plan EIR (County of Placer 2003), the registration form nominating the DeWitt General Hospital Historic District for listing on the National Register of Historic Places (NPS 2015), and the Cultural Resources Inventory Update for the Placer County Government Center Master Plan Update Project (Appendix D).

8.1 EXISTING CONDITIONS

Archaeological Setting

To provide context for the discussion of archaeological resources within the vicinity of the project site, overviews of prehistory, ethnography, and history are provided below.

The City of Auburn vicinity is within the ethnographic territory of the Nisenan, one of three Maiduan-speaking tribelets inhabiting the northeastern half of the Sacramento Valley and the adjoining western slopes of the Sierra Nevada. Also known as the Southern Maidu, the Nisenan inhabited several named villages near present-day Auburn (Wilson and Towne 1978: Figure 1).

The Nisenan made their home along tributaries and drainages of the American, Yuba, and Bear Rivers, and the lower reaches of the Feather River. Permanent settlements were often located on low rises near larger streams, with seasonal encampments located along smaller drainages (Wilson and Towne 1978).

Initial Euro-American use of the Auburn vicinity did not occur until after the discovery of gold near Coloma in 1848. Although Spanish missionaries, and, later, American trappers, entered the

general region, no accounts of visits to the Auburn vicinity are known. With the Gold Rush, however, the region became heavily populated with prospectors, entrepreneurs, and others seeking their fortune in the goldfields. The present-day community of Auburn arose from a mining camp that was known successively as Rich Dry Diggings, North Fork Dry Diggings, Wood's Dry Diggings, and ultimately Auburn. During the ensuing decades, many became disenchanted with the search for gold and turned to other means of making a living. In the Auburn vicinity, various agricultural practices (e.g., cattle ranching, fruit orchards) became common economic pursuits (NFA/URS 2002).

For a more detailed cultural archaeological setting, see the Archaeological Resources chapter of the DeWitt Center Existing Conditions Report (NFA/URS 2002) and the Cultural Resources Inventory Update for the Placer County Government Center Master Plan Update Project (Appendix D). For development of the DeWitt Center Existing Conditions Report, URS completed a review of ethnographic and historic literature and maps, archaeological base maps and site records, survey reports, and atlases of historic places on file at the North Central Information Center of the California Archaeological Inventory at California State University Sacramento. In addition, a review of the Sacred Lands File housed within the Native American Heritage Commission (NAHC) and consultation with local Native American groups and individuals identified by the NAHC were completed. That effort also included a pedestrian reconnaissance of the entire DeWitt property. In addition, in 2017, Dudek reviewed and updated the prior cultural resources investigations conducted for the PCGC property. The review of cultural resources technical information, fieldwork, and reporting for this project was conducted by Adam Giacinto, RPA, who meets the Secretary of the Interior's Professional Qualifications Standards. As of the date of the North Central Information Center records search, conducted on August 1, 2017, no additional cultural resources had been recorded within the project site since preparation of the Draft EIR for the DeWitt Government Center Facility Plan (i.e., from 2003 to 2010) (North Central Information Center Report ID 006745B; County of Placer 2003a).

Historical Architectural Setting

History

The Auburn area witnessed a great amount of Euro-American use, although it was not until after the discovery of gold at Sutter's Mill in 1848 that Euro-American people began entering the region en masse. The general area of the northern Sierra Nevada foothills was visited by non-native peoples prior to 1848. Gabriel Moraga, under the flag of Spain, led an expedition from Mission San Jose up to the Cosumnes and Feather Rivers in 1808. In 1813, Jose Arguello reached the Cosumnes River, where he battled a band of Miwok. Narciso Duran and Luis Arguello left San Francisco in 1817 and passed through the region on their expedition. Arguello

is credited with naming the Feather River (i.e., El Rio de Las Plumas) (Beck and Haase 1974; McGowan 1961 as cited in NFA/URS 2002).

Following the Spanish entrance to the area, this region of California was visited by American trappers looking for new areas to exploit. Jedediah Smith, Joseph Walker, and Ewing Young passed through the region on their journeys through California. Captain John Sutter was granted his roughly 1,000-square-mile “New Helvetia” ranch near present-day Sacramento in 1839. It was from Sutter’s Mill, near present-day Coloma, that John Marshall discovered gold in 1848. Soon after, the famous gold rush began and the region became quickly populated with prospectors, entrepreneurs, and others (Bean 1977; Lavender 1972; McGowan 1961 as cited in NFA/URS 2002).

Gold Mining

The Auburn vicinity was one of the first areas in California to be subjected to the onslaught of the gold seekers. In May 1848, while en route to Coloma, Claude Chana discovered gold in what is now known as Auburn Ravine. With this local discovery, the Auburn area became a focal point for the initial wave of miners. The mining camp that sprang up in the Auburn Ravine vicinity was known successively as Rich Dry Diggings, North Fork Dry Diggings, and Wood’s Dry Diggings. In summer 1849, a large group of miners from Auburn, New York, renamed the camp Auburn in honor of their former home (Gudde 1968, 1974; Hoover et al. 1990 as cited in NFA/URS 2002).

The early mining activities were focused on the extraction of gold from the many streams within the vicinity. Early mining was conducted using a number of devices, including the common miner’s pan, the batea (a wooden pan of Mexican origin), the cradle (also known as a rocker), an elongated cradle known as the Long Tom, and the sluice box. Of these, the sluice box was the most efficient, and, thus, the most profitable (Averill 1948:19; Logan 1948:31 as cited in NFA/URS 2002).

When it was discovered that the extinct streambeds located above the known stream courses also contained deposits, another period of inventiveness occurred. The first solution was to carry soil to a sluice box or cradle. This was followed by the method referred to as ground sluicing, where water was brought to the top of the deposit and allowed to run down-slope. The runoff, with the help of the miners, eroded the deposit and became laden with gold-bearing soil. As this slurry ran downhill, it was directed into sluices and the gold was collected (Logan 1948:31 as cited in NFA/URS 2002). The early diggings in Auburn were evidently quite productive. It is reported that, during the peak of productiveness, it was not unusual for a miner to take out \$1,000 to \$1,500 a day (Hoover et al. 1990:260 as cited in NFA/URS 2002).

Hydraulic mining, perhaps the most efficient and most destructive advancement in mining in the area, was invented in neighboring Nevada County. As a means to wash hillside deposits into sluices, Edward E. Mattison devised a ditch and reservoir intake system that fed water into a 4- to 5-inch-diameter canvas hose tipped with a sheet iron nozzle. The resulting pressurized stream was directed at the gold-bearing deposits and, as with ground sluicing, the flow was directed into sluices (Logan 1948:31 as cited in NFA/URS 2002). Many of the canals, ditches, and flumes that occur in the project region are components of former hydraulic mining operations.

Hard-rock gold mining, the extraction of ore from a gold-bearing quartz vein, was also practiced in the Auburn area, although not to the degree as that of its northern neighbors in Grass Valley and Nevada City. A review of the Mineral Land Classification of Placer County, prepared by the California Division of Mines and Geology (Loyd 1961 as cited in NFA/URS 2002), indicates that a prospect or mine is within proximity to the project site. The Report of the State Mineralogist (State of California 1936, as cited by Loyd 1961:24 as cited in NFA/URS 2002) identifies the mine/prospect as the Black Ledge, located in T13N, R8E, Section 32. However, Loyd's primary reference (the Report of the State Mineralogist from 1936) is confusing. The Black Ledge is not discussed on the indicated page (i.e., page 24); rather, on page 25 reference is made to a "Black Lead, a former producer," which lies nearby to the south of the Two Orphans prospect in T13N, R8E, Section 30. No details are provided regarding specific location, vein orientation, or production history. Since only township and range are provided, the exact location of the mine/prospect remains in question.

Mining Ditches and Canals

By one count, approximately 700 miles of mining ditches and flumes were built in Placer County through 1865 (JRP Historical Consulting Services 2000 as cited in NFA/URS 2002). These were built, at first, to supply water for washing soil at "dry diggings" (gold regions not adjacent to rivers), and later, for hydraulic mining. The most profitable of these were short ditches, for which initial construction and maintenance costs were low. Eventually, companies formed for the exclusive purpose of building canals and supplying water to miners for fees. Some of their works were ambitious, involving construction of dams, reservoirs, tunnels, high trestle flumes, and many miles of canals. In Placer County, the three principal water companies of the early 1850s merged in 1854 to form the South Yuba Water Company. Among the canals that were owned by the South Yuba Water Company were the Upper Boardman, Lower Boardman, and Fiddler's Green Canals. Each of these was located a few miles east of the Ophir Canal, a portion of which is located within the project site (NFA/URS 2002).

Ophir Canal

The Ophir Canal appears to have been constructed between 1887 and 1894. The Ophir Canal is not depicted on the 1887 official map of Placer County (Uren 1887 as cited in NFA/URS 2002). However by 1894, the South Yuba Water and Mining Company's listing of active canals notes that the Ophir Canal was 10 miles long, had a flow of 13 cubic feet of water per second, and was capable of delivering 8,500,000 gallons of water per day (as cited in NFA/URS 2002).

The canal was built to supply water to the mines at Ophir, a small mining town several miles south of the project site. Today, the town of Ophir is State Historic Landmark #463. A state historic plaque at the town states that Ophir was founded in 1849, was the most populous town in Placer County in 1852, and was later a center of quartz mining activity. The water that was delivered by the Ophir Canal was needed to power stamp mills and to wash soil for the recovery of minerals (NFA/URS 2002).

The Ophir Canal was part of the South Yuba Water and Mining Company's holdings until 1911, when the Pacific Gas and Electric Company purchased the Placer County holdings of the South Yuba Water Company. The Ophir Canal was owned by the Pacific Gas and Electric Company from 1911 until 1933, when the Nevada Irrigation District purchased Pacific Gas and Electric's Gold Hill System, including the Ophir Canal (NFA/URS 2002). The following excerpt is from the Historic Architectural Survey Report for the Proposed Home Depot Project (NFA/URS 2002).

Other canals in Placer County remained independently owned into the 1920s. Long before this date, mining had largely ceased in the Sierra foothills, and canals began to be used for agricultural purposes. A number of canals were incorporated into the Nevada Irrigation District (NID) in the 1920s. The NID is a public agency that was formed in 1921 by an act of Nevada County voters. Its purpose was to create a year-round water supply for farmers within the district, which then comprised 202,000 acres. The NID was enlarged to 268,000 acres in 1926 when a portion of Placer County was added to it. The NID inherited numerous canals, irrigation ditches, flumes and dams, and after its creation it built many more facilities. Today, the NID owns 400 miles of canals and 300 miles of pipelines. It has diversified its mission and now supplies water for agricultural, industrial, municipal, domestic and hydroelectric purposes.

Relocation of a Portion of the Ophir Canal

To make room for the construction of DeWitt General Hospital, a portion of the Ophir Canal was reconstructed and relocated. The segment between Bell Road and Willow Creek Drive is still called the Ophir Canal while the segment between Willow Creek Drive and Atwood Road is

called the Kemper Canal. The segment of the canal between Professional Drive and Willow Creek Drive was encased in a pipe below grade as part of construction of the Home Depot store in the eastern portion of the PCGC campus.

Water from the Ophir Canal was supplied to DeWitt General Hospital. A report that was prepared in February 1946, shortly after the hospital closed, noted that the hospital purchased raw water from the Nevada Irrigation District, then filtered and chlorinated the water, and pumped it into the hospital's distribution system (Laughbaum and Norgaard 1946 as cited in NFA/URS 2002). The hospital's open, earthen reservoir was located immediately south of the terminus of the relocated portion of the Ophir Canal. The water treatment plant and an enclosed, concrete water storage tank were located a short distance east of the canal.

DeWitt General Hospital, 1943–1946

In anticipation of possible entry into World War II, the United States began a limited mobilization of troop strength and development of facilities in 1939. Along with the construction of military barracks and other facilities, the United States Army commenced planning for the expansion of its hospital facilities on American soil (NFA/URS 2002).

Hospital development took several forms during the years 1940-1944. The War Department recognized that there was a substantial need for additional patient capacity, based on the increase in the number of enlisted men. There were 1,686,403 men in the Army in December 1941; this increased to 6,993,102 by June 1943 (Brosin undated). Initially, patient beds were added to existing hospital facilities, as this was the fastest way of increasing patient capacity in the United States. When this method proved inadequate for meeting hospital bed demand, new hospitals were developed in two ways. One was to acquire existing civilian facilities, such as hotels, hospitals, and schools, and to convert them into army hospitals. Another method, with speed and economy as prime factors, was to build large complexes of wooden hospital buildings called Cantonment hospitals. Nine cantonment hospitals were constructed throughout the United States in 1941, however all had various defects and lacked sufficient space for critical hospital functions (Brosin undated). Other building plans and types were considered by the War Department, and five two-storied semi-permanent plan hospitals were constructed beginning in 1942. However it was determined that the initial costs for these facilities were considerably greater than cantonment hospitals so no further two-storied semi-permanent plan hospitals were constructed. Faced with lumber shortages and interest from the Veterans' Administration in planning for postwar use of new hospital buildings, the War Department authorized a third type of hospital, a one-storied semi-permanent type known as Type A. These hospital complexes were constructed mainly of unreinforced brick, and employed patient wards of one story. DeWitt General Hospital was one of 12 army hospitals built to this plan in the United States during 1943

and 1944 (Brosin undated). Out of the many decommissioned semi-permanent Type A facilities, DeWitt General Hospital was not selected for postwar use as a Veterans' facility.

A New York architectural firm, York and Sawyer, was hired to draw plans for the Semi-permanent Type A hospital complex in fall 1942. York and Sawyer was a major architectural firm with a long history of designing large buildings and complexes. They specialized in large office buildings, banks, hospitals, and colleges, and were sometimes consultants to the federal government, as they were for development of the Federal Triangle in Washington, D.C. Their work on large complexes, including hospitals, and their contacts with the federal government, prepared them for the task of designing Semi-permanent Type A hospitals during World War II (NFA/URS 2002).

All of the new hospitals that were built for the Army in World War II—Cantonment, Semi-permanent, and Semi-permanent Type A hospitals—conformed to the pavilion plan. The pavilion plan was originally developed in the late 18th century. It was popularized, and the form was greatly refined, by Florence Nightingale as a result of her experiences in the Crimean War (mid-1850s). Believing that disease spread through harmful vapors that were emitted by the body, she pushed, with great success, for hospitals that admitted plenty of fresh air and light to each patient. She felt that large, monolithic, block-shaped hospital buildings were poorly designed for achieving these ends, but hospitals that were dispersed in plan could admit the air and light that was necessary for health. Instead of one large building, Nightingale favored numerous buildings of one or two stories in height. Buildings should not be so close to each other as to cast shadows on each other or interfere with air flow around and through buildings. Buildings could be connected by corridors, but there should be no enclosed courts or high walls. Buildings should be no more than 30 feet in width and arranged on a north/south axis for maximum exposure to natural light (NFA/URS 2002).

The pavilion plan was first widely used for military hospitals in Europe and the United States in the second half of the 19th century. They were also used for non-military hospitals, especially from the late 19th century to the mid-20th century. Pavilion plan hospitals continued to be built until the proliferation of new technologies radically changed hospital design in the 1950s. Thus, World War II military hospitals were among the last pavilion plan hospitals to be built (NFA/URS 2002).

As the pavilion plan developed in urban areas, where real estate was valuable, hospitals sometimes grew to many stories, but in accordance with pavilion principles, wings were narrow and were widely separated from each other (NFA/URS 2002).

During World War II, the development of Army hospitals saw a return to early pavilion plan design principles in one important respect. Nearly all of the new Army hospitals were built on

the outskirts of cities or in the interior of the country, where land was plentiful. Accordingly, these hospitals were dispersed in plan and were composed of buildings that were only one or two stories in height (NFA/URS 2002).

Many factors determined the locations chosen for general hospitals. Early policy was to place hospitals near large Army training camps. These camps, however, were rarely near large population centers, and hospitals thus lacked access to a civilian work force to staff positions. In early 1942, fear of air attack from overseas led to a decision to place hospitals in the interior of the country, between the Appalachian Mountains and Sierra Nevada. Unfortunately, the ports of debarkation were located on the coasts, and this policy made it difficult to get patients from the Pacific and European theaters to the hospitals. This policy was modified later in 1942, and later rescinded. In the end, more than half of the general hospitals were located in coastal states. Proximity to rail lines, moderate weather, and flat terrain were other desirable characteristics that helped determine the location of hospitals (NFA/URS 2002).

One factor that was not considered until almost all hospital locations had been decided was the proximity of hospitals to the hometowns of the wounded soldiers. At length, the War Department decided that sending soldiers to hospitals near their homes would be a worthwhile policy. As one of the last hospitals to be designated, DeWitt General Hospital was built in accordance with this policy. Although Auburn had a population of only 4,013 in 1940, it was close to Sacramento and many small towns in the Sierra Nevada foothills. Its other advantages were moderate weather and a flat terrain (NFA/URS 2002).

Auburn was chosen as the location of DeWitt General Hospital on March 25, 1943. The chosen site had been known as the Grange Hall property, in the Rock Creek vicinity, after an old grange hall that still stands very near to the project site. By the end of April 1943, construction contracts were signed with MacDonald and Kahn. Designs for nearly all buildings at DeWitt General Hospital were according to the standard plan for Semi-permanent Type A hospitals drawn by architects York and Sawyer. To meet the need for a substantial and rapid increase in patient capacity, “speed and economy were the prime factors in this new building phase, and simplicity of design was sought above all else” (Brosin undated). Accordingly, construction was swift, with some of the buildings complete in just 5 months, by the end of August 1943. According to the Placer Herald in January 8, 1944, the first two patients arrived on January 1, 1944, but DeWitt General Hospital officially received patients in February and was formally opened with a flag raising in early March 1944 (NFA/URS 2002).

It appears that the 1,852 patient beds at DeWitt General Hospital were generally filled. Harriet Berner, who visited patients on a daily basis as a volunteer during the war, remembers clearly that “every bed was filled,” and that the wards were “full to capacity” (Berner 2002 as cited in NFA/URS 2002). June Ferretti, a civilian who worked 6 days a week in the signal corps

operating the telephone switchboard and teletype, also remembered DeWitt General Hospital as a busy place, and the wards were pretty much filled to capacity (Ferretti 2002 as cited in NFA/URS 2002). The busiest moment in DeWitt General Hospital's history during the war may have been in November 1944, when a Union Pacific train derailed near Colfax. Ambulances, doctors, and nurses were sent there from DeWitt General Hospital and returned with the injured, numbering 60 civilians and 18 soldiers. According to a 1984 article, DeWitt General Hospital treated 9,741 patients during its nearly 2 years of operation (Leonard 1984 as cited in NFA/URS 2002).

Badly wounded soldiers came to DeWitt General Hospital regardless of whether it was close to their hometowns. June Ferretti remembers that as soldiers recuperated, they would be transferred to hospitals that were closer to their homes (Ferretti 2002 as cited in NFA/URS 2002). Likewise, soldiers from Northern California would arrive at DeWitt General Hospital once they were able to be moved. Some patients were even sent to their homes and family to recuperate. Patients came and went with frequency (NFA/URS 2002).

Harriet Berner estimates that “at least eighty percent” of the patients at DeWitt General Hospital were wounded in the European theater (Berner 2002 as cited in NFA/URS 2002). June Ferretti agrees that patients were from both theaters (Ferretti 2002 as cited in NFA/URS 2002). The hospital was much closer to the Pacific theater of war. This suggests that the Army did indeed make a special effort to place patients in hospitals close to their hometowns; otherwise, most patients at DeWitt General Hospital would have been from the Pacific theater.

The hospital was closed at the end of World War II and after only two years of operation (NFA/URS 2002).

DeWitt State Hospital, 1946–1971

With an eye on the local economy, residents of Auburn lobbied for the hospital site to be re-used in some way upon the end of the war. Many preferred that DeWitt General Hospital become a Veterans Administration hospital, a use that was rejected. Instead, the federal government sought to divest itself of the property by selling it to the state. Appraisers determined that, because of the moderate weather, the best use of the property might be as a tuberculosis sanitarium. Use as a mental hospital was considered impractical because the dispersed arrangement of the buildings would necessitate a large staff, resulting in high operational costs, and Auburn's small population would make it difficult to assimilate such a staff in the town. Other uses, such as housing or industry, were rejected because the site's location a few miles north of the town proper was then considered to be a substantial distance (NFA/URS 2002).

The state's existing mental institutions, however, were overcrowded at the time by approximately 6,300 patients, or 24% of the total patient population. Although the state had

recently funded the building of new institutions, the program was not expected to be complete until 1951, by which time the existing institutions were expected to be even more overcrowded. Thus, the decision was made for the state to acquire DeWitt General Hospital and to devote it to use as a mental hospital. Interior remodeling of buildings and upgrading of equipment was performed, and the name was changed to DeWitt State Hospital (NFA/URS 2002).

Density of patient beds was increased compared to the war years, with 1,900 patients in September 1947, a capacity of 2,500 in March 1948, and a capacity of 2,900 in September 1948. In 1952, 700 staff were employed to care for 3,000 patients. At first, patients arrived only from other, overcrowded, state mental hospitals, but in 1950 new patients, from Modoc, Lassen, Plumas, Sierra, Nevada, Yuba, Sutter, Placer, and El Dorado Counties, were admitted. It was announced in 1952 that patients would soon be admitted from Yolo, Butte, and Sacramento Counties, as well (NFA/URS 2002).

DeWitt State Hospital became the eighth state mental hospital in California. The first, in Stockton, opened in 1853. As the population of the state grew, new mental hospitals were built by the state in Napa (1875), Agnews (1889), Mendocino (1894), Patton (1894), Metropolitan (1916), and Camarillo (1937). Besides DeWitt State Hospital, the post-war expansion of the mental health system included hospitals at Modesto (1948) and Atascadero (1954). In 1971, under Governor Ronald Reagan, major changes occurred in California as many state mental institutions were closed, and patients were transferred to group homes or released (NFA/URS 2002).

Placer County Government Center, 1971–Present

In 1971, DeWitt State Hospital, along with most other state mental hospitals, was closed. The property was transferred to the County. Since then, the property has been used by the County as its main service center with many of its offices and a significant number of services. As discussed in Chapter 3, Project Description, building demolition and construction has occurred over the last 30 years to better facilitate delivery of County services and also due to the nature of seventy-five year old semi-permanent WWII-era structures. This includes construction of the Auburn Main Jail and Juvenile Detention Center in the early and mid-1990s, and the Finance and Administration building in 1998. In 2003, the County adopted the 2003–2010 DeWitt Government Center Facility Master Plan. Under this plan, the County demolished several of the original DeWitt General Hospital buildings to allow for construction of the Auburn Justice Center and the Community Development Resource Center buildings. The County also decommissioned the wastewater treatment plant and constructed two emergency residential shelters in the western portion of the PCGC campus (County of Placer 2003b). Most recently, the County constructed a new Animal Services Center in the western portion of the PCGC campus. In addition, the County has undertaken a wide range of building repairs and modifications over

time, such as construction of ADA ramps and stairs, painting and weather proofing facades, replacing roofing and windows, and heating and air conditioning equipment.

DeWitt General Hospital Historic District Designation

As part of development of the 2003 DeWitt Government Center Facility Master Plan and associated EIR, a survey was conducted to identify historic architectural resources within the PCGC campus. The findings of this survey were originally presented in the Historic Architectural Survey Report section in the DeWitt Center Existing Conditions Report (NFA/URS 2002). The report identified and evaluated the buildings greater than 45 years of age within the PCGC campus to determine eligibility for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). The report found that a number of structures greater than 45 years of age exist at the project site. These structures were constructed in 1943 as part of DeWitt General Hospital (NFA/URS 2002).

As discussed in Chapter 3, Project Description, of this EIR, although the DeWitt Center Existing Conditions Report concluded that the DeWitt General Hospital area appeared to be eligible to be listed in the NRHP and CRHR as a historic district, the State Historic Preservation Officer later determined that the PCGC campus did not qualify as a historic district or support any historic buildings (Mikesell 2004). Later that year, the State Historic Preservation Officer again concurred with the Army Corps of Engineers determination that the building demolition and construction anticipated in the 2003 DeWitt Government Center Facility Plan would not involve historic properties (Donaldson 2004). The reason given for determining the property ineligible for listing in the NRHP was a diminished integrity resulting from numerous alterations made to the property's character-defining features since DeWitt General Hospital's use was ended, and "removal of key architectural elements associated with its use as a World War II-era hospital" (Mikesell 2004).

However, the 2015 NRHP Registration Form (NPS 2015), as completed by the applicant for historic designation, stated that "most of the remaining original hospital buildings have not been significantly altered in their footprints or general exterior appearance," and "the core of the DeWitt Hospital complex retains much of its historic military and institutional feel." The Registration Form's author stated that "the integrity of the DeWitt Hospital's World War II era building design, materials, layout and setting contribute to a cohesive sixty-three acre district representing its feeling of historic time and place. The hospital's remaining structures retain their appearance as a World War II [Semi-permanent Type A] military hospital, conveying their sense of history. The property reflects its military complex layout and is distinguished from its surroundings by its architecture, street pattern and building placement" (NPS 2015).

National Register of Historic Places Criterion A

Under Criterion A, properties may be eligible for the NRHP if they “are associated with events that have made a significant contribution to the broad patterns of our history” (National Register Bulletin 15, p.2). As discussed in the DeWitt Center Existing Conditions Report, DeWitt General Hospital is one of a few survivors of the many large hospitals built to treat World War II soldiers. “As this war was one of the most significant events in the history of this country, a variety of buildings and complexes that were built to advance its cause are likely to be eligible for the National Register” (NFA/URS 2002).

Based on research conducted in preparation of the DeWitt Center Existing Conditions Report and on research in the Federal Archives, DeWitt General Hospital appears to be one of the most intact examples of a Semi-permanent Type A hospital built in the United States for World War II (NFA/URS 2002). Thus, the DeWitt General Hospital Historic District was listed in the NRHP in part due to its eligibility under Criterion A, with a period of significance from 1944 to 1945, which are the two years the complex functioned as an Army hospital.

The 2015 NRHP Registration Form, as completed by the applicant for historic designation, describes that the DeWitt General Hospital retains much of its historic integrity, including the materials (about half of the unreinforced brick buildings have been retained, and some original wood windows and doorframes remain), the simple and utilitarian workmanship borne out of the speed and economy at which the unreinforced brick and wood campus was constructed, and the historic military and institutional feel, noting that the “majority of building façades remain largely intact, contributing to their feeling and appearance as World War II military hospital structures” (NPS 2015). The 2015 NRHP Registration Form also states that “approximately half of the patient wards, all of the enlisted men’s barracks (later converted to wards), and nearly all service and utility type buildings remain, as do the theater, chapel, gymnasium, and swimming pool. Buildings no longer in existence include the administration building, six officer’s quarters, four medical buildings, and seventeen patient wards” (NPS 2015).

The 2015 NRHP Registration Form identifies the following contributing and non-contributing buildings within the DeWitt General Hospital Historic District: 13 patient wards; 11 enlisted men’s barracks that were later converted to patient wards; 10 staff and patient services building (such as mess halls, the chapel, post office, and theater); and 15 additional buildings, including warehouses, laundry, and shop buildings (NPS 2015).

Contributing Structures

1. Patient Ward Building 107
2. Patient Ward Building 108

3. Patient Ward Building 109
4. Patient Ward Building 110
5. Patient Ward Building 111
6. Patient Ward Building 112
7. Patient Ward Building 113
8. Patient Ward Building 114
9. Patient Ward Building 115
10. Patient Ward Building 116
11. Patient Ward Building 117
12. Chapel, Building 118
13. Auditorium and Library, Building 208
14. Post Office, Canteen, and Offices, Building 209
15. Patient Mess Hall and Kitchen, Building 210
16. Patient Ward Building 211
17. Patient Ward Building 212
18. Laundry, Building 301
19. Warehouse, Building 302
20. Warehouse, Building 303
21. Warehouse, Building 304
22. Warehouse, Building 305
23. Shop, Building 306
24. Morgue, Building 307
25. Storage, Building 308
26. Enlisted Men Barrack Building 309
27. Enlisted Men Barrack Building 310
28. Enlisted Men Barrack Building 311
29. Enlisted Men Barrack Building 312
30. Enlisted Men Barrack Building 313

31. Enlisted Men Barrack Building 314
32. Theater, Building 315
33. Enlisted Men Mess Hall, Building 318
34. Enlisted Men Recreation, Building 319
35. Enlisted Men Barrack Building 320
36. Enlisted Men Barrack Building 321
37. Enlisted Men Barrack Building 322
38. Enlisted Men Barrack Building 323
39. Enlisted Men Barrack Building 324
40. Gymnasium, Building 410
41. Swimming Pool
42. Swimming Pool Changing Room, Building 411
43. Swimming Pool Storage, Building 412
44. Auto Shop, Building 413
45. Fire Station, Building 417
46. Mason's Storage, Building 418
47. Engineer's Department and Utility Yard, Building 419
48. Engineer's Department and Utility Yard, Building 420
49. Engineer's Department and Utility Yard, Building 423
50. Powerhouse, Building 430

List of Noncontributing Structures

51. Maintenance Garage
52. Garage
53. Garage
54. Garage
55. Garage

National Register of Historic Places Criterion B

Properties may be eligible for the NRHP under Criterion B if they “are associated with the lives of significant persons in our past” (National Register Bulletin 15, p.2.). One of the patients who resided at the DeWitt State Hospital, Martin Ramirez, became an important artist who achieved recognition through local and national art exhibits as early as 1951. His work was first noticed by Tarmo Pasto, who was an art and psychology professor at Sacramento State University and an early researcher in the area of artistic expression and psychology theory. Pasto influenced the development of the field of art therapy as treatment for mental illness (NPS 2015). These connections with local and national historic contexts of health/medicine and art established DeWitt State Hospital’s eligibility for listing in the NRHP under Criterion B. The period of significance for the DeWitt State Hospital’s association with Ramirez is 1948 to 1963, the years that he created his most notable artwork while in residence as a patient at the hospital (NPS 2015). Based on its association with Martin Ramirez, DeWitt State Hospital is included in the Latinos in 20th Century California Multi-Property Listing, under the associated contexts Latinos in the Arts as an example of the Residences and Studios of Prominent Persons property type (NPS 2015).

National Register of Historic Places Criterion C

Under NRHP Criterion C, properties “that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction,” can also be eligible for the National Register (National Register Bulletin 15, p.2). The DeWitt Center Existing Conditions Report also discusses DeWitt General Hospital as an example of the large-scale planning and construction that was required during the war as part of the mobilization of U.S. forces. “The architectural firm, York and Sawyer, and the general contractor, MacDonald and Kahn, both had extensive experience in the construction of very large projects before the war, in both the public and private sector, and were capable of building a complex of dozens of buildings rapidly. The hospital complex was a large, self-contained community of over 2,000 people. As such, it included, in addition to hospital facilities, employee housing, extensive recreational facilities, and a nearly complete utility infrastructure (only electricity came from outside the property)” (NFA/URS 2002). The DeWitt Center Existing Conditions Report documents the recreation facilities included in the hospital, and notes that this hospital included more such facilities than other hospitals of the time (NFA/URS 2002).

As discussed above, DeWitt General Hospital was constructed as a “pavilion plan,” consisting of numerous buildings of one or two stories in height with courtyard spaces between each building to ensure that light would reach most interior spaces and to provide for better air circulation. “While many examples of pavilion plan hospitals remain in this country, DeWitt is remarkable

because it was a response to the very particular problems posed by World War II. It had to be built on a large scale with both speed and economy, while maintaining fairly high standards regarding patient comfort, fire-resistance, and durability. It was a return to the values espoused by Florence Nightingale in the 1850s in that its ward buildings were only one story in height and possessed sunrooms. Both of these features gave patients access to fresh air and natural light” (NFA/URS 2002).

The 2015 NRHP Registration Form noted that “despite the recent demolition of approximately thirty percent of the hospital’s structures that were located on the northern and western portion of the property, the DeWitt General Hospital complex still embodies a majority of the distinctive design characteristics” of the Semi-permanent Type A hospital, with 49 contributing buildings as listed previously, generally intact pattern of streets and landscaping, and moderate to high integrity of exterior building façades throughout the district (NPS 2015). The Registration Form also states that “the northern façades of all eleven patient wards are relatively intact while the southern façades have been more heavily altered with replacement windows and coverings of stucco or wood replacing the sunroom glazing. The long façades and the connecting corridors of the patient wards and enlisted men’s barracks remain generally intact, often including the retention of the original windows and some original doors” (NPS 2015).

The DeWitt General Hospital Historic District is listed in the NRHP in part due to its eligibility under Criterion C, with a Period of Significance from 1942–1945, which are the years the complex was designed and built (NPS 2015).

California Register of Historical Resources

Similarly, DeWitt General Hospital is eligible for the CRHR under Criteria 1, 2, and 3 for the same reasons as those stated for the NRHP. Due to its listing on the NRHP and its eligibility for listing on the CRHR, the DeWitt General Hospital Historic District is considered a historic resource for the purposes of the California Environmental Quality Act.

Assembly Bill 52 Tribal Consultation

The County drafted contact letters to all tribes that have requested notification from the County of projects under Assembly Bill (AB) 52. On July 26, 2017, letters were sent via certified mail to the four Native American contacts that are traditionally and culturally affiliated with the project area to supply information regarding the project and request information or concerns regarding Native American cultural resources that could be affected by the project. The letters informed the individuals of the initiation of the environmental review process for the project, project location and details, and the opportunity for consultation regarding the project. The letter conveyed that the recipient had 30 days from the receipt of the letter to request or deny, in writing, consultation for the project.

On July 27, 2017, the Wilton Rancheria responded via email to the County’s notification letter and requested consultation for the project. The County responded to the Wilton Rancheria request for consultation via email on September 7, 2017. No further responses from the Wilton Rancheria were received.

The United Auburn Indian Community (UAIC) responded to the County’s notification letter on July 31, 2017, via email and the U.S. Postal Service requesting consultation for the project and providing recommended mitigation measures. The County responded to the UAIC request for consultation via email, and the County and UAIC participated in a meeting and site visit on October 3, 2017. The UAIC requested to be provided with copies of all existing cultural resource assessments and requests for and results of records searches that have been conducted for the project. These reports and record searches have been provided. The UAIC also provided recommended mitigation measures. The County has consulted with UAIC regarding the potential for tribal cultural resources to exist within the project site and development of appropriate mitigation measures, as discussed in Impact 8-1.

8.2 REGULATORY FRAMEWORK

Cultural resources are defined as buildings, sites, structures, or objects having historical, architectural, archaeological, cultural, and/or scientific importance. Several laws and regulations at the federal and state levels govern archaeological and historic resources deemed to have scientific, historic, or cultural value. The pertinent regulatory framework, as it applies to the proposed project, is summarized below.

Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 established the NRHP as the official federal list of cultural resources that have been nominated by state offices for their historical significance at the local, state, or national level. Properties listed in the NRHP, or determined eligible for listing, must meet certain criteria for historical significance, and possess integrity of form, location, and setting. Under Section 106 of the National Historic Preservation Act and its implementing regulations, federal agencies are required to consider the effects of their actions, or those they fund or permit, on properties that may be eligible for listing or that are listed in the NRHP. The Code of Federal Regulations (36 CFR 60.4) describes the criteria to evaluate cultural resources for inclusion in the NRHP. Properties may be listed in the NRHP if they possess integrity of location, design, setting, materials, workmanship, feeling, and association, and they:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;

- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.

These factors are known as Criteria A, B, C, and D.

In addition, the resource must be at least 50 years old, except in exceptional circumstances. Eligible properties must meet at least one of the criteria and exhibit integrity, which is measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original fabric has been retained, and the reversibility of the changes to the property. Archaeological sites are also evaluated under Criterion D, which concerns the potential to yield information important in prehistory or history.

The Section 106 review process, typically undertaken between the U.S. Army Corps of Engineers as part of issuing a Section 404 permit, and the State Historic Preservation Officer, involves a four-step procedure:

1. Initiate the Section 106 process by establishing the undertaking, developing a plan for public involvement, and identifying other consulting parties.
2. Identify historic properties by determining the scope of efforts, identifying cultural resources, and evaluating their eligibility for inclusion in the NRHP.
3. Assess adverse effects by applying the criteria of adverse effect on historic properties (resources that are eligible for inclusion in the NRHP).
4. Resolve adverse effects by consulting with the State Historic Preservation Officer and other consulting agencies, including the Advisory Council on Historic Preservation, if necessary, to develop an agreement that addresses the treatment of historic properties.

The Department of the Interior has set forth Standards and Guidelines for Archaeology and Historic Preservation. These standards and guidelines are not regulatory and do not set or interpret agency policy. A project that follows the Standards and Guidelines for Archaeology and Historic Preservation generally is considered mitigated to a less-than-significant level, according to Section 15064.5(b)(3) of the CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.).

State Regulations

California Register of Historical Resources

California Public Resources Code (PRC) Section 5024.1 authorizes the establishment of the CRHR. Any identified cultural resources must be evaluated against the CRHR criteria. To be determined eligible for listing in the CRHR, a property must be significant at the local, state, or national level under one or more of the following four significance criteria, modeled on the NRHP:

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

In addition to meeting one or more of the above criteria, a significant property must also retain integrity. Properties eligible for listing in the CRHR must retain enough of their historic character to convey the reason(s) for their significance. Integrity is judged in relation to location, design, setting, materials, workmanship, feeling, and association.

California Environmental Quality Act

Under CEQA, public agencies must consider the effects of their actions on historical resources and unique archaeological resources. Pursuant to PRC Section 21084.1, 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.” PRC 21083.2 requires agencies to determine whether proposed projects would have effects on “unique archaeological resources.”

“Historical resource” is a term of art with a defined statutory meaning (see PRC 21084.1 and CEQA Guidelines, Sections 15064.5[a] and 15064.5[b]). The term embraces any resource listed in or determined to be eligible for listing in the CRHR. The CRHR includes resources listed in or formally determined eligible for listing in the NRHP, 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 CRHR and are presumed to be “historical resources” for purposes of CEQA unless a preponderance of evidence indicates otherwise (PRC 5024.1 and 14 CCR 4850). Unless a resource listed in a survey has been demolished or has 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 potentially eligible for the CRHR.

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 CRHR criteria prior to making a finding as to a proposed project’s impacts to historical resources (PRC 21084.1 and CEQA Guidelines, Section 15064.5[a][3]). In general, a historical resource, under this approach, is defined as any object, building, structure, site, area, place, record, or manuscript that (CEQA Guidelines, Section 15064.5[a][3]):

- A. Is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, or cultural annals of California; and
- B. Meets any of the following criteria:
 1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
 2. Is associated with the lives of persons important in our past;
 3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 4. Has yielded, or may be likely to yield, information important in prehistory or history.

These factors are known as Criteria 1, 2, 3, and 4 and are parallel to Criteria A, B, C, and D under the National Historic Preservation Act.

CEQA also distinguishes between classes of archaeological resources: archaeological sites that meet the definition of a historical resource, as described above; “unique archaeological resources”; and “tribal cultural resources.” Under CEQA, specifically Public Resources Code section 21083.2, an archaeological resource is considered “unique” if it:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or

- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA states that if a proposed project would result in an impact that might cause a substantial adverse change in the significance of a historical resource, then an EIR must be prepared and mitigation measures and alternatives must be considered. A “substantial adverse change” in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (CEQA Guidelines Section 15064.5[b][1]).

The CEQA Guidelines (Section 15064.5[c]) also provide specific guidance on the treatment of archaeological resources, depending on whether they meet the definition of a historical resource or a unique archaeological resource. If the site meets the definition of a unique archaeological resource, it must be treated in accordance with the provisions of PRC Section 21083.2. CEQA Guidelines Section 21074 describes a tribal cultural resources as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe.

CEQA Guidelines Section 15064.5(e) requires that excavation activities be stopped whenever human remains are uncovered and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are those of Native Americans, the NAHC must be contacted within 24 hours. At that time, the lead agency must consult with the appropriate Native Americans, if any, as identified in a timely manner by the NAHC. Section 15064.5 of the CEQA Guidelines directs the lead agency (or applicant), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains.

Senate Bill 297

Senate Bill 297 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction; and establishes the NAHC to resolve disputes regarding the disposition of such remains. Senate Bill 297 has been incorporated into Section 15064.5(e) of the CEQA Guidelines.

California State Assembly Bill 52

AB 52 updated PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 (found within the CEQA Guidelines). AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. PRC Section 21074 describes a tribal cultural resource as a site, feature, place, cultural landscape, sacred

place, or object that is considered of cultural value to a California Native American tribe. A tribal cultural resource is either:

- On the California Register of Historical Resources or a local historic register;
- Eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

AB 52 formalizes the lead agency/tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR.

Section 1(a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation must include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) must include any mitigation measures that are adopted (PRC Section 21082.3[a]).

Local Regulations

Auburn/Bowman Community Plan

The Auburn/Bowman Community Plan provides goals and policies with the aim of preserving historical, cultural, and/or archaeological resources. Those goals and policies applicable to the proposed PCGC Master Plan Update, including construction of the proposed Health and Human Services building and the Multifamily Residential project located at 1st Street and B Avenue are listed below (County of Placer 1999):

Goal III.C.2.K Implement zoning and subdivision controls which protect and preserve significant natural, open space, and cultural resources in the Auburn/Bowman community.

Policy III.C.3.a.9 Structures of historic or architectural significance shall be identified and documented, and efforts shall be made to preserve them and use them as a focal point in community design.

Goal IV.E.2a. Preserve and enhance significant historical, cultural, and/or archaeological sites and the surrounding environment.

Policy IV.E.3.a Identify and protect from destruction and abuse all representative and unique historical, cultural, and archaeological sites and their immediate environment.

Policy IV.E.3.c Encourage the development of multipurpose facilities which can function as recreational sites, open space areas and for historic, cultural, and archeological preservation.

Policy IV.E.3.d Require site-specific studies for archaeological or historical sites within the federal government’s definition of “historical context” in all instances where land development has the potential to have a detrimental impact on these sites.

Policy IV.E.3.e Protection of significant cultural resources is a priority over recordation and/or destruction.

Placer County General Plan

The Placer County General Plan also establishes goals and policies regarding the preservation of historical, archaeological, and cultural resources in Section 5, Recreation and Cultural Resources. Those goals and policies pertinent to the proposed project are listed below (County of Placer 2013):

Goal 1.I To establish and maintain interconnected greenbelts and open spaces for the protection of native vegetation and wildlife and for the community’s enjoyment.

Policy 1.I.1 The County shall require that significant natural, open space, and cultural resources be identified in advance of development and incorporated into site-specific development project design. The Planned Residential Developments (PDs) and the Commercial Planned Developments (CPD) provisions of the Zoning Ordinance can be used to allow flexibility for this integration with valuable site features.

- Goal 5.D** To identify, protect, and enhance Placer County’s important historical, archaeological, paleontological, and cultural sites and their contributing environment.
- Policy 5.D.3** The County shall solicit the views of the Native American Heritage Commission and/or the local Native American community in cases where development may result in disturbance to sites containing evidence of Native American activity and/or to sites of cultural importance.
- Policy 5.D.6** The County shall require that discretionary development projects identify and protect from damage, destruction, and abuse, important historical, archaeological, paleontological, and cultural sites and their contributing environment. Such assessments shall be incorporated into a countywide cultural resource data base, to be maintained by the Department of Museums.
- Policy 5.D.7** The County shall require that discretionary development projects are designed to avoid potential impacts to significant paleontological or cultural resources whenever possible. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. Determinations of impacts, significance, and mitigation shall be made by qualified archaeological (in consultation with recognized local Native American groups), historical, or paleontological consultants, depending on the type of resource in question.
- Policy 5.D.8** The County shall, within its power, maintain confidentiality regarding the locations of archaeological sites in order to preserve and protect these resources from vandalism and the unauthorized removal of artifacts.
- Policy 5.D.9** The County shall use the State Historic Building Code to encourage the preservation of historic structures.
- Policy 5.D.10** The County will use existing legislation and propose local legislation for the identification and protection of cultural resources and their contributing environment.

Policy 5.D.11 The County shall support the registration of cultural resources in appropriate landmark designations (i.e., National Register of Historic Places, California Historical Landmarks, Points of Historical Interest, or Local Landmark). The County shall assist private citizens seeking these designations for their property.

8.3 PROJECT IMPACTS

Significance Criteria

The significance criteria used to evaluate the project’s impacts to cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to cultural resources would occur if the project would:

1. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
3. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis

Impact 8-1

	Would the project cause a substantial adverse change in the significance of a historical resource?		
	<i>PCGC Master Plan Update</i>	<i>Health and Human Services Building</i>	<i>Multifamily Residential Project</i>
Level of Significance:	Significant	Significant	No impact
Mitigation Measures:	Mitigation Measure 8a	No Feasible Mitigation Available	None required
Significance after Mitigation:	Significant and Unavoidable	Significant and Unavoidable	No impact

PCGC Master Plan Update

Under the proposed PCGC Master Plan Update, the County would retain 15 of the contributing structures to the DeWitt General Hospital Historic District, including buildings 114, 115, 116, 117, 118, 301, 302, 303, 304, 305, 418, 419, 420, 423, and 430; totaling thousands of square feet. In addition, Building 118, the original chapel, would be maintained next to a series of patient wards, Buildings 114 through 117 which would preserve a portion of the general layout and relationship between buildings. The remainder of the existing buildings within the DeWitt

General Hospital Historic District are proposed to be demolished over the life of the proposed PCGC Master Plan Update.

Under CEQA, a significant adverse effect would result from any change to the DeWitt General Hospital Historic District's integrity of location, design, setting, materials, workmanship, or feeling (the district does not retain integrity of association, so changes to the district's association would not result in a significant impact). Demolition of any part of the district would impair the district's integrity. Significant adverse impacts to integrity could also result from any material changes to any part of the district that would change its appearance in terms of design, materials, or workmanship. This would also include changes outside the district that would visually impact the district's current setting and feeling.

Under the PCGC Master Plan Update, contributing and non-contributing buildings within the DeWitt General Hospital Historic District are proposed to be demolished to allow for construction of new non-contributing facilities within certain portions of and adjacent to the district, which could result in changes to the visual setting and feeling of the retained buildings that are contributing features to the historic district. Thus, implementation of the proposed project would result in a **significant impact** to the historic district.

Prior to demolition of a historic resource, it is typical to require archival photograph recordation of the resource in order to retain the historic information that the resource provides. In 2004, to meet the requirements of the EIR certified for the County's adoption of the 2003 Facilities Master Plan, the County completed archival photograph recordation of the entire project site (Mesa Technical 2004). The recordation meets the requirements of the Historic American Building Survey Level II, which includes the following:

1. **Drawings:** Select existing drawings, where available; should be photographed with large-format negatives or photographically reproduced on Mylar.
2. **Photographs:** Photographs with large-format negatives of exterior and interior views, or historic views, where available.
3. **Written data:** History and description in narrative or outline format.

The photographic recordation also meets additional Historic American Building Survey material standards regarding reproducibility, durability, and size, and the work was completed by individuals that meet the Secretary of the Interior's professional qualifications for architectural historians and photographers. Because recordation of all of the contributing features to the DeWitt General Hospital Historic District has already been completed, no additional recordation is warranted at this time.

Additionally, the County has recently established the DeWitt History Museum within the building located at 2995 Richardson Drive. This building, used for officer's quarters during the hospital era, is not a contributing feature to or located within the boundaries of the DeWitt General Hospital Historic District. The museum includes photographs, artifacts, and exhibits that provide information on the various uses of the property, from its purchase by the federal government as a WWII hospital, its subsequent purchase by the State Department of Mental Hygiene as a state hospital, and its most current function as The Placer County Government Center.

Although the proposed project proposes to demolish buildings within the DeWitt General Hospital Historic District, the project would retain the grid street pattern and would implement design guidelines that would establish a campus identity. This would ensure that the PCGC campus will continue to be “distinguished from its surroundings by its architecture, street pattern and building placement” (NPS 2015). The design guidelines require particular attention to projects located at the perimeter of the campus, stating that these should “define or reinforce established and implied campus edges in ways that clarify the identity of the campus as distinct from the surrounding community” (County of Placer 2018).

The design guidelines include landscape guidelines that provide design and material standards to reinforce a consistent appearance for campus streets, walks, and open spaces. Overall the design guidelines will establish a campus identity and reinforce character through a unifying campus context. The design guidelines recommend that brick be used as a primary cladding material for future construction within the PCGC campus, consistent with the materials used historically at the site (County of Placer 2018).

At the time that the DeWitt General Hospital was first constructed, the project area was rural, approximately 3 miles north of downtown Auburn, California. Ongoing development in the area has led to the region becoming more suburban, although a rural landscape remains to the west of the PCGC campus. At full build-out of the PCGC Master Plan Update, the western portion of the PCGC campus would retain some suburban and rural qualities, and the eastern portion would be more urban.

As stated above, under the PCGC Master Plan Update, 15 original DeWitt General Hospital buildings would be retained, including four patient wards and the chapel. Ongoing building maintenance is anticipated to be necessary for all of the retained buildings. As the time that specific maintenance needs are identified, the County will evaluate feasibility of completing those improvements or repairs consistent with the Secretary of the Interior's standards, as required by Mitigation Measure 8a. However, the County cannot determine feasibility of meeting these standards until the specific maintenance needs arise. Additionally, some of the Corporation Yard functions may require building modifications that do not meet Secretary of Interior

standards, such as modification of existing openings or building features to allow for effective and efficient management of County equipment, materials, and resources. No additional mitigation measures are available to reduce the significant impact that would result from building demolition and future building modifications and this impact would remain **significant and unavoidable**. Project alternatives that would reduce and avoid this demolition are discussed in Chapter 20, Alternatives, of this EIR.

Health and Human Services Building

Construction of the Health and Human Services building would require demolition of three buildings (106, 107, and 108) that are identified as contributing features to the DeWitt General Hospital Historic District. As discussed above, this would result in a **significant** impact. The Health and Human Services building would be constructed consistent with the PCGC Master Plan Update, including the design guidelines. The project would maintain the existing grid street pattern and implement building and landscape design measures to create a building that is consistent with the overall campus identity and character.

Photographic recordation of the three existing buildings has already been completed. No additional mitigation measures are available to reduce the significant impact that would result from building demolition and this impact would remain **significant and unavoidable**. A project alternative that would avoid this demolition is discussed in Chapter 20 of this EIR.

Multifamily Residential Project

Construction of the Multifamily Residential project located at 1st Street and B Avenue would require that the on-site segment of Ophir Canal be encased. The canal is owned by the Nevada Irrigation District, which requires the canal to be encased when development occurs adjacent to it. This will protect water quality and public safety, but would remove this feature from the landscape. The Ophir Canal is not identified as a contributing feature to the DeWitt General Hospital Historic District (NPS 2015). The 2018 addendum to the Cultural Resources Inventory Update for the Placer County Government Center Master Plan Update Project (Appendix D) provides an evaluation of the canal. During a site evaluation, five historical features were observed along the segment of the canal that crosses the PCGC property. These included two concrete flow gates, one Nevada Irrigation District inspection box, a pump station (located outside of the project site and is not to be affected), and a concrete bridge with brick rails. All features were recorded to California Office of Historic Preservation (OHP) standards by updating the existing DPR form for this resource. The bridge and concrete features are associated with the WW II-era DeWitt Hospital, and are not considered contributors to this NRHP-listed district. The canal segment and features are not part of the original Ophir Canal route, and as such are not considered to be associated with this larger feature's period of significance. Based on these

considerations, the canal segment and associated features are not considered eligible for CRHR/NRHP listing. Having been appropriately documented to OHP standards, modification of the canal and associated features will not represent a significant effect to cultural resources (Appendix D).

Further, 1st Street would be relocated to the west but would maintain the same general alignment. Thus, the project would preserve the grid street pattern within the PCGC campus. This project would not require demolition or alteration of any of the contributing features to the DeWitt General Hospital Historic District, thus the project would have no impact to historic resources and no mitigation is required.

Impact 8-2	Would the project cause a substantial adverse change in the significance of an archeological resource?		
	<i>PCGC Master Plan Update</i>	<i>Health and Human Services Building</i>	<i>Multifamily Residential Project</i>
Level of Significance:	Potentially Significant	Potentially Significant	Potentially Significant
Mitigation Measures:	Mitigation Measures 8b through 8e	Mitigation Measures 8b through 8e	Mitigation Measures 8b through 8e
Significance after Mitigation:	Less than Significant	Less than Significant	Less than Significant

PCGC Master Plan Update

One archeological resource has been identified within the PCGC campus. The resource is not located within any of the areas proposed for development and therefore no impacts to the archeological resource are anticipated as a result of implementation of the PCGC Master Plan Update.

It is not anticipated that any subsurface prehistoric or historic resources would be uncovered during project construction. However, the possibility exists that ground-disturbing activities could disturb previously unknown historical or archaeological resources, resulting in a **potentially significant** impact. To ensure that adverse impacts are avoided in the event that cultural resources are discovered during project construction, Mitigation Measure 8b requires all construction workers to be trained to recognize potential cultural resources and that all construction activities be halted in the vicinity of a potential resource until that resource can be evaluated by a qualified archeologist and a plan for protection or data recovery is established. Mitigation Measure 8c establishes the protocols that must be followed if unanticipated archeological resources are encountered during construction to ensure that any such materials are appropriately evaluated and treated such that their archeological resource values are retained. Mitigation Measure 8d requires that tribal representatives from culturally-affiliated tribes be

allowed access to the project site within the first five days of ground-breaking activity to inspect soil piles, trenches, or other disturbed areas to determine if any Native American archeological resources are present and defines protocol for handling any such resources. Mitigation Measure 8e requires that the County and individual project applicants accommodate periodic monitoring by one Native American Monitor from the culturally-affiliated Native American Tribe in those areas of the campus that have been previously undeveloped. With implementation of Mitigation Measures 8b through 8e, ongoing implementation of the PCGC Master Plan Update would result in **less-than-significant** impacts to any cultural resources that may be encountered on site.

Health and Human Services Building

There are no archeological resources known to be present within the Health and Human Services building site. No impacts to archeological resources are expected to occur as a result of construction of this project. Implementation of Mitigation Measures 8b through 8e would be required to ensure that project construction would result in **less-than-significant** impacts to any cultural resources that may be encountered on site.

Multifamily Residential Project

There are no archeological resources known to be present within the Multifamily Residential project site located at 1st Street and B Avenue. No impacts to archeological resources are expected to occur as a result of construction of this project. Implementation of Mitigation Measures 8b through 8e would be required to ensure that project construction would result in **less-than-significant** impacts to any cultural resources that may be encountered on site.

Impact 8-3	Would the project cause a substantial adverse change in the significance of a tribal cultural resource?		
	<i>PCGC Master Plan Update</i>	<i>Health and Human Services Building</i>	<i>Multifamily Residential Project</i>
Level of Significance:	Potentially Significant	Potentially Significant	Potentially Significant
Mitigation Measures:	Mitigation Measures 8b through 8e	Mitigation Measures 8b through 8e	Mitigation Measures 8b through 8e
Significance after Mitigation:	Less than Significant	Less than Significant	Less than Significant

PCGC Master Plan Update

The County sent letters offering consultation on the proposed project to the four tribes that have requested notification from the County of projects subject to CEQA, in accordance with AB 52. Two tribes did not respond; and one tribe responded but did not request consultation. The

County engaged in consultation with the Wilton Rancheria by providing copies of the archeological resource evaluations completed for the site and information describing the proposed project. Upon review of that material, the Wilton Rancheria informed the County that no further consultation was requested. The County engaged in consultation with the UAIC in the form of a meeting, site visit, and subsequent coordination regarding UAIC’s proposed mitigation measures. The UAIC identified that there are tribal cultural resources, which are also historic resources, within the vicinity of the project site, but did not specifically identify any such resources on the project site; although the known archeological resource within the PCGC property may be considered a tribal cultural resource. The UAIC also provided recommendations for mitigation measures to address potential impacts to tribal cultural resources. Through the consultation process between Placer County and the UAIC, the UAIC’s recommendations for mitigation have been incorporated in Mitigation Measures 8b through 8e, as discussed previously. With implementation of Mitigation Measures 8b through 8e, ongoing implementation of the PCGC Master Plan Update would result in **less-than-significant** impacts to any tribal cultural resources that may be encountered on-site.

Health and Human Services Building

There are no known tribal cultural resources within the Health and Human Services building site. No impacts to tribal cultural resources are expected to occur as a result of construction of this project however there is potential for tribal cultural resources to be uncovered during construction activities. Implementation of Mitigation Measures 8b through 8e would be required to ensure that project construction would result in **less-than-significant** impacts to any tribal cultural resources that may be encountered on site.

Multifamily Residential Project

There are no tribal cultural resources known to be present within the Multifamily Residential project site located at 1st Street and B Avenue. No impacts to tribal cultural resources are expected to occur as a result of construction of this project however there is potential for tribal cultural resources to be uncovered during construction activities. Implementation of Mitigation Measures 8b through 8e would be required to ensure that project construction would result in **less-than-significant** impacts to any tribal cultural resources that may be encountered on site.

Impact 8-4	Would the project disturb any human remains?		
	<i>PCGC Master Plan Update</i>	<i>Health and Human Services Building</i>	<i>Multifamily Residential Project</i>
Level of Significance:	Potentially Significant	Potentially Significant	Potentially Significant
Mitigation Measures:	Mitigation Measure 8b	Mitigation Measure 8b	Mitigation Measure 8b
Significance after Mitigation:	Less than Significant	Less than Significant	Less than Significant

PCGC Master Plan Update

There are no known human remains within the PCGC campus. No human remains have been discovered during any of the construction that has occurred on site since 1943. However, there is a potential for Native American human remains or related cultural material to be encountered during construction phases that involve earth-moving activities (grading and trenching). Disturbance or destruction of Native American human remains and related cultural material would constitute a significant impact of the project. Mitigation Measure 8b defines the protocol that must be followed in the event that human remains are identified onsite to ensure that the project complies with Section 15064.5(e) of the CEQA Guidelines (as incorporated from PRC Section 5097.98) and California Health and Safety Code Section 7050.5. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances would be suspended on site and any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that a county-approved coroner be contacted to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the NAHC within 24 hours. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work for means of treating, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98 (14 CCR 15064.5[e]). With implementation of Mitigation Measure 8b, any potential discovery of human remains during construction would be evaluated to determine if there is any cultural or archeological significance to the find, and measures would be taken as required by state law to ensure that the remains are handled appropriately. Thus, any potential impact associated with disturbance of human remains would be **less than significant**.

Health and Human Services Building

There are no known human remains within the Health and Human Services building site. No impacts associated with disturbance of human remains are expected to occur as a result of construction of this project. Compliance with Mitigation Measure 8b would ensure that project construction would result in **less-than-significant** impacts associated with disturbance of human remains that may be encountered on site.

Multifamily Residential Project

There are no known human remains within the Multifamily Residential project site located at 1st Street and B Avenue. No impacts associated with disturbance of human remains are expected to occur as a result of construction of this project. Compliance with Mitigation Measure 8b would ensure that project construction would result in **less-than-significant** impacts associated with disturbance of human remains that may be encountered on site.

Impact 8-5	Would the project contribute to substantial adverse changes in historical, archeological, or tribal resources in the cumulative scenario?		
	<i>PCGC Master Plan Update</i>	<i>Health and Human Services Building</i>	<i>Multifamily Residential Project</i>
Level of Significance:	Significant	Significant	Less than Significant
Mitigation Measures:	No Feasible Mitigation Available	No Feasible Mitigation Available	None required
Significance after Mitigation:	Significant and Unavoidable	Significant and Unavoidable	Less than Significant

This cumulative impacts analysis considers the potential effects to cultural resources that could result from ongoing development in the North Auburn area. In the cumulative scenario, it is expected that urbanization of the State Route 49 corridor will continue and additional moderate-to low-density residential development will occur west of the PCGC campus, as anticipated in the Auburn/Bowman Community Plan and reflected in the list of reasonably foreseeable projects provided in Table 5-1 in Chapter 5, Land Use.

PCGC Master Plan Update

Historic Resources

The PCGC Master Plan Update would result in demolition of 35 of the contributing features to the DeWitt General Hospital Historic District. This constitutes a **significant and unavoidable** impact to historic resources. There are no other projects in the cumulative scenario that are known to have an adverse effect on historic resources; however, there is potential for future projects to contribute to a loss of historic resources, such as stacked rock walls, water supply canals and ditches, and historic buildings. Combined, the loss of historic resources at the PCGC campus, along with loss of other historic resources in the project region, would result in a significant cumulative impact. With the demolition of buildings in the DeWitt General Hospital Historic District, the PCGC Master Plan Update would make a cumulatively considerable contribution to this impact, and, therefore, the project's impact would be significant. Photographic recordation of the historic buildings has already been completed. No additional mitigation measures are available to reduce the significant impact that would result from

building demolition and future building modifications and the impact would remain **significant and unavoidable**. Project alternatives that would reduce and avoid this demolition are discussed in Chapter 20 of this EIR.

Archeological Resources, Tribal Cultural Resources, and Human Remains

There is one archeological resource site within the PCGC campus. No impacts to that site would occur as a result of implementation of the PCGC Master Plan Update. The project site is in an archeologically-rich region, and there are known archeological and tribal cultural resources in the vicinity. However, there are no known projects in the cumulative scenario that would adversely affect such resources. Thus, cumulative impacts to archeological resources, tribal cultural resources, and human remains are expected to remain **less than significant**, and there would be no significant cumulative impact the project could contribute to.

Health and Human Services Building

Construction of the Health and Human Services building would require demolition of three buildings (106, 107, and 108) that are identified as contributing features to the DeWitt General Hospital Historic District. As discussed above, this would result in a cumulatively considerable contribution to the significant cumulative impact associated with loss of historic resources throughout the region. Photographic recordation of the contributing features to the historic district has already been completed. No additional mitigation measures are available to reduce the significant impact that would result from building demolition and future building modifications and the impact would remain **significant and unavoidable**.

There are no known archeological resources, tribal cultural resources, or human remains within the Health and Human Services building site and no known projects in the cumulative scenario that would adversely affect such resources. Thus, cumulative impacts to archeological resources, tribal cultural resources, and human remains are expected to remain **less than significant**, and there would be no significant cumulative impact the project could contribute to.

Multifamily Residential Project

There are no historic resources within the Multifamily Residential project site thus this project would not contribute to cumulative impacts to such resources. There are no known archeological resources, tribal cultural resources, or human remains within the Multifamily Residential project site and no known projects in the cumulative scenario that would adversely affect such resources. Thus, cumulative impacts to archeological resources, tribal cultural resources, and human remains are expected to remain **less than significant**, and there would be no significant cumulative impact the project could contribute to.

8.5 MITIGATION MEASURES

Mitigation Measure 8a At the time that building maintenance and repair needs are identified for any building within the project site that is identified as a contributing feature to the DeWitt General Hospital Historic District, the County of Placer shall implement all applicable and feasible provisions of the Secretary of the Interior’s Standards for Rehabilitation, codified as 36 Code of Federal Regulations Part 67, and shall review and implement any appropriate Guidelines for Rehabilitating Historic Buildings and Guidelines on Sustainability for Rehabilitating Historic Buildings.

Mitigation Measure 8b Tribal Cultural Resource Awareness Training: Prior to initiation of construction, all construction crew members, consultants, and other personnel involved in project implementation shall receive project-specific Tribal Cultural Resource (TCR) awareness training. The training shall be conducted in coordination with qualified cultural resource specialists and representatives from culturally-affiliated Native American Tribes. The training will emphasize the requirement for confidentiality and culturally-appropriate, respectful treatment of any find of significance to culturally-affiliated Native Americans Tribes.

As a component of the training, a brochure will be distributed to all personnel associated with project implementation. At a minimum the brochure shall discuss the following topics in clear and straightforward language:

- Field indicators of potential archaeological or cultural resources (i.e., what to look for; for example: archaeological artifacts, exotic or non-native rock, unusually large amounts of shell or bone, significant soil color variation, etc.)
- Regulations governing archaeological resources and tribal cultural resources
- Consequences of disregarding or violating laws protecting archaeological or tribal cultural resources
- Steps to take if a worker encounters a possible resource

The training shall include project-specific guidance for on-site personnel including agreed upon protocols for resource avoidance, when to stop work, and who to contact if potential archaeological resources or TCRs are identified. The training shall also direct work to stop, and contact with the County Coroner and

the Native American Heritage Commission (NAHC) to occur immediately, in the event that potential human remains are identified. NAHC will assign a Most Likely Descendant if the remains are determined by the Coroner to be Native American in origin.

Mitigation Measure 8c Inadvertent Discoveries: If potential Native American prehistoric, historic, archaeological or cultural resources including midden soil, artifacts, chipped stone, exotic rock (non-native), or unusual amounts of baked clay, shell or bone are uncovered during any on-site construction activities, all work must immediately stop within 100 feet of the find. Following discovery, a professional archaeologist shall be retained to evaluate the significance of the deposit, and the Placer County Department of Public Works and Facilities, the Department of Museums, and Native American representatives from culturally affiliated Native American Tribes will make recommendations for further evaluation and treatment, as appropriate. In the event that the resource is found to be ineligible for inclusion in the California Register of Historical Resources, the culturally affiliated Native American Tribe shall be notified. Culturally appropriate treatment and disposition shall be determined following coordination with the culturally affiliated Native American Tribe. Culturally appropriate treatment may be, but is not limited to, processing materials in a lab for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, and returning objects to a location within the project area where they will not be subject to future impacts. UAIC does not consider curation of TCRs to be appropriate or respectful and requests that materials not be permanently curated, unless requested by the Tribe. If articulated or disarticulated human remains are discovered during construction activities, the County Coroner and Native American Heritage Commission shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendant who will work with the project proponent to define appropriate treatment and disposition of the burial(s). Following a review of the find and consultation as noted above, the authority to proceed may be accompanied by the addition of development requirements or special conditions which may provide for protection of the site and/or additional measures necessary to address the unique or sensitive nature of the site. Work in the area of the cultural resource discovery may only proceed after authorization is granted by the Placer County Department of Public Works and Facilities following coordination with tribal representatives and cultural resource experts, if necessary and as appropriate.

Mitigation Measure 8d Post-Ground Disturbance Site Visit: The applicant shall notify the CEQA lead agency a minimum of seven days prior to initiation of ground disturbance to allow the agency time to notify culturally-affiliated tribes. Tribal representatives from culturally-affiliated tribes shall be allowed access to the project site within the first five days of ground-breaking activity to inspect soil piles, trenches, or other disturbed areas. If potential Native American prehistoric, historic, archaeological or cultural resources including midden soil, artifacts, chipped stone, exotic rock (non-native), or unusual amounts of baked clay, shell or bone are identified during this initial post-ground disturbance inspection the following actions shall be taken:

- Work shall be suspended within 100 feet of the find, and the project applicant shall immediately notify the CEQA lead agency representative. The project applicant shall coordinate any subsequent investigation of the site with a qualified archaeologist approved by the Placer County Department of Public Works and Facilities and a tribal representative from the culturally-affiliated tribe(s). The archaeologist shall coordinate with the culturally-affiliated tribe(s) to allow for proper management recommendations should potential impacts to the resources be found by the CEQA lead agency representative to be significant.
- A site meeting of construction personnel shall be held in order to afford the tribal representative the opportunity to provide TCR awareness information.
- A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the CEQA lead agency representative by the qualified archaeologist. Possible management recommendations for historical, unique archaeological or TCRs could include resource avoidance, preservation in place, reburial on-site, or other measures deemed acceptable by the applicant, the County, and the tribal representative from the culturally-affiliated tribe(s).

The contractor shall implement any measures deemed by CEQA lead agency staff to be necessary and feasible to avoid or minimize significant effects to the TCR, including the use of a Native American Monitor whenever work is occurring within 100 feet of the find.

Mitigation Measure 8e Native American Monitors: To facilitate identification of potential archaeological resources and/or Tribal Cultural Resources (TCRs) at the earliest

possible time during project-related earth-disturbing activities, the project proponent and/or their construction contractor(s) shall accommodate periodic monitoring by one Native American Monitor from the culturally-affiliated Native American Tribe in those areas of the campus that have been previously undeveloped. Monitoring will occur on the construction site periodically (as often as weekly) for spot checks of construction activities. Much of the Placer County Government Center campus has been subjected to heavy disturbance including subsurface disturbance; therefore, this spot-check monitoring shall be limited to those areas of the site that have been previously undeveloped. The monitoring shall occur only during ground-disturbing activities including vegetation clearing, grubbing, and stripping or other earth-moving/disturbing activities such as grading or excavation. The Native American monitor shall make these periodic spot checks as deemed necessary to minimize the potential for destruction of or damage to previously undiscovered resources, and to ensure respectful treatment and disposition of unearthed/displaced resources. If initial monitoring efforts suggest that resources are unlikely to be identified on a given site, Native American monitoring shall be suspended, following agreement by the UAIC and the County, and the Inadvertent Discoveries mitigation measure shall provide necessary protection in the event of unanticipated resources. Native American monitors or their representatives shall have the authority to request that work be temporarily stopped, diverted, or slowed within 100 feet of identified cultural resources. The Native American monitor or representative shall recommend appropriate treatment and final disposition of Tribal Cultural Resources.

8.6 REFERENCES CITED

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