

CALIFORNIA COASTAL COMMISSION

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STAFF REPORT AND RECOMMENDATIONON CONSISTENCY DETERMINATION

Consistency Determination No. CD-015-02
Staff: JRR-SF
File Date: March 8, 2002
60th Day: May 7, 2002
75th Day extended to: August 16, 2002
Commission Meeting: August 6-9, 2002

FEDERAL AGENCY: U.S. Army

DEVELOPMENTLOCATION:

Former Army base at Fort Ord, Monterey County (Exhibit 1, 2, 3, and 4)

DEVELOPMENTDESCRIPTION:

Demolition of Stilwell Hall and removal of rock revetment protecting the structure

SUBSTANTIVE

FILE DOCUMENTS: See Page 13

EXECUTIVE SUMMARY

The Army proposes to demolish Stilwell Hall, a former Soldier's Club located on coastal bluffs adjacent to the ocean. In addition, the Army will remove all associated facilities including parking lots, roads, and fences. Finally, Army will remove the revetment located at the base of the bluffs seaward of Stilwell Hall.

The project includes the removal of an existing revetment that has substantial adverse effects on marine resources including sandy intertidal habitat and local sand supply, and thus the removal will restore the habitat and improve sand resources. In addition, the demolition of the building and the removal of the revetment will be done in a manner that minimizes adverse effects on marine resources and water quality. Therefore, the project is consistent with Sections 30230, 30231, and 30235 of the Coastal Act, and thus is consistent with the Marine Resource and Water Quality Policies of the California Coastal Management Program (CCMP).

Stilwell Hall is located seaward of Highway 1 and it affects visual resources of the coastal zone. Although the proposed removal will restore the natural character of the area, the building is an historic structure that is part of the visual character of the area and the proposed demolition will change that character. However, Army and those supporting preservation of the structure do not currently have sufficient funds to relocate the building. In addition, preservation of it at its current location is not feasible because natural bluff erosion will likely cause the building to fall into Monterey Bay within the next few years. Therefore, at this time there does not appear to be a feasible alternative that will preserve the building, and since the demolition will restore the natural character of the area, it is consistent with Section 30251 of the Coastal Act. In addition, the proposed removal of the revetment will remove a structure that significantly degrades the visual character of the shoreline and interferes with lateral public access. Therefore, the removal is consistent with Sections 30210, 30211, and 30251 of the Coastal Act, and thus is consistent with the Access and Visual Policies of the CCMP.

Finally, the project is located adjacent to sensitive dune habitat and near snowy plover nesting habitat. The project protects these environmentally sensitive habitat areas (ESHAs) by removing artificial structures that interfere with the natural processes of the habitat, revegetating the site after completion of the demolition, and implementing the project outside of the snowy plover's nesting season. Therefore, the project is consistent with Section 30240(b) of the Coastal Act, and thus consistent with the ESHA policy of the CCMP.

STAFF SUMMARY AND RECOMMENDATION:

I. Project Description.

The Army proposes to demolish Stilwell Hall, a former Soldier's and Community Club located on coastal bluffs adjacent to the ocean. The proposed activity will consists of the following actions:

1. Demolition and removal of the building and parking lots, including the aggregate sub-base, chain link fence, barriers, and associated infrastructure;
2. Abatement and disposal of building debris and hazardous material (lead paint and asbestos);
3. Removal of the basement, foundation, revetment, riprap, and rock seawall;
4. Restoration of the site through regarding, interim stabilization, and planting of native vegetation to stabilize the dunes.

Demolition will commence with the removal of the roof tiles, walls, foundation, asphalt parking lots, and basement. The Army will not use heavy equipment until October, after

the snowy plover nesting season. After the building is demolished, the Army will remove the revetment and rock protecting the bluff seaward of Stilwell Hall. The equipment will operate from the beach by removing the riprap and armor stone starting from the south side and working north. Removal will progress in a general sequence from top to bottom. The Army will use a small loader to collect rock around the perimeter of the revetment. The Army will transport the rock to a stockpile area and it will be re-used by the contractor for other activities in the region. The Army proposes to remove the rock to mean lower low water (MLLW) unless natural hazards or potential environmental damage prevent complete removal. In order to minimize environmental effects from the removal of the revetment, the Army proposes to: 1) not operate the equipment in the water; 2) remove all the equipment from the beach each day; 3) monitor the beach for hydraulic oil, lubricant, and fuel releases; and 4) contain and clean-up any chemical spills.

The Army will use existing roads and an eroded ocean outfall gully to access the beach for the removal of the revetment. The Army will configure, using onsite material, a temporary road through the floor of the gully and along the beach to the revetment site. Upon completion of the rock removal, the Army will restore the road site to its original conditions.

II. Background. The Army proposes to remove Stilwell Hall, a 52,000 square-foot former soldier's club and recreation hall. It was completed in 1943 as part of the development of Fort Ord. Erosion of the bluffs seaward of Stilwell Hall has been a recurring problem since the Army constructed the building. At the time of construction, it, a 400-foot setback separated the building from the bluff edge. Approximately 300 feet of that buffer was lost to erosion from 1943 to 1950. In 1950, the Army constructed a rubble mound revetment to retard the erosion and maintained it by adding broken concrete scrap. In 1983, the revetment failed and the Army reconstructed it. However, the bluffs continued to erode and severe winter storms continue to erode the bluff and the southwest corner of the building extends over the bluff edge. The Army estimates the current erosion rate at six to seven feet per year.

In 1991, the Army proposed the closure of the Army base at Fort Order and subsequently proposed transferred all of the area west of Highway 1 (including Stilwell Hall) to the California Department of Parks and Recreation. The transfer, which has not yet occurred, is dependent on remediation of hazardous waste sites and removal or relocation of Stilwell Hall.

Bluff erosion continues to threaten the building. Last winter, the Army removed the south wing of the structure in an emergency action because bluff erosion was undermining that portion of the building. In response to the continued hazard, the Army proposed to demolish the remainder of the building and remove the revetment protecting the structure.

III. Status of Local Coastal Program.

The standard of review for federal consistency determinations is the policies of Chapter 3 of the Coastal Act, and not the Local Coastal Program (LCP) of the affected area. If an LCP that the Commission has certified and incorporated into the California Coastal Management Program (CCMP) provides development standards that are applicable to the project site, the LCP can provide guidance in applying Chapter 3 policies in light of local circumstances. If the Commission has not incorporated the LCP into the CCMP, it cannot guide the Commission's decision, but it can provide background information. The Commission has certified Monterey County's LCP and partially incorporated it into the CCMP.

IV. Federal Agency's Consistency Determination.

The Army has determined the project to be consistent to the maximum extent practicable with the California Coastal Management Program.

V. Staff Recommendation. The staff recommends that the Commission adopt the following motion:

I move that the Commission concur with consistency determination CD-15-02 that the project described therein is fully consistent, and thus is consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program (CCMP).

A. Recommendation. Staff recommends a **YES** vote on the motion. Passage of this motion will result in a concurrence with the determination and adoption of the following resolution and findings. An affirmative vote of a majority of the Commissioners present is required to pass the motion.

B. Resolution To Concur With Consistency Determination

The Commission hereby concurs with the consistency determination by the U.S Army, on the grounds that the project described therein is fully consistent, and thus is consistent to the maximum extent practicable, with the enforceable policies of the CCMP.

VI. Findings and Declarations:

The Commission finds and declares as follows:

A. Marine Resources. Section 30230 of the Coastal Act provides that:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall

be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act provides that:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30235 of the Coastal Act provides that:

Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fish kills should be phased out or upgraded where feasible.

1. **Resource Benefits.** The Army proposes to remove the entire rock revetment above MLLW. This component of the project will have a significant benefit to coastal resources. The rocks cover existing sandy beach habitat and adversely affect local sand supply. In addition, by slowing erosion, the rocks are preventing a significant amount of sand from entering the littoral system. Section 30230 of the Coastal Act provides for the restoration of marine habitat where feasible. In addition, the intent of Section 30235 is to protect marine resources from impacts associated with the construction of shoreline protective devices. Although Section 30235 does not address the removal of seawalls (except where they cause water quality problems, which is not the case here), the removal of the revetment is consistent with the intent of this section. After removal of the building, the Stilwell Hall revetment will not protect an existing structure, and thus will serve no purpose. In addition, the revetment causes damage to the marine environment and sand supply. The removal of this structure will eliminate this ongoing impact and will result in the restoration of marine resources.

2. **Construction Impacts.** Although the proposed removal of Stilwell Hall and its revetment will benefit marine resources, the removal activities could cause potential

adverse effects. Specifically, the removal activities can result in the discharge of debris and pollutants into the marine environment. However, the Army proposes mitigation measures to protect against this impact. During the demolition of the building, the Army will construct a barrier west of the building to prevent debris from falling into the ocean. In addition, the Army will monitor this debris protection measure to ensure that it is effective. The proposed removal of the revetment involves the use of heavy equipment on the beach, which could result in the discharge of oil, grease, and other pollutants into the marine environment. However, the Army proposes mitigation measures that will minimize these construction-related impacts. Specifically, the Army proposes to: 1) operate all equipment at least five feet away from the edge of the water; 2) remove all equipment at the end of the day; 3) monitor equipment for leaks of hydraulic oil, lubricants, or fuels; and 4) contain and clean-up any chemical spills. With these measures, the project will not adversely affect marine or water quality resources.

Another construction-related issue is the amount of rock that will be removed. Ideally, the Commission would prefer that entire revetment be demolished. However, safety and environmental concerns may prevent complete removal of all of the stones. In order to protect water quality, the Army proposes to keep all vehicles out of the water, which will prevent removal of rocks in deeper waters. In addition, to avoid adverse effects on snowy plover the demolition project will occur during the non-nesting season (winter) season, which is a period of high wave energy. The exposure to wave hazards is further increased by the fact that the revetment will be removed after the building is demolished, otherwise it is possible that the building will collapse into Monterey Bay. Thus, the Army will probably not start the revetment removal until late November or December. With these timing limitations, the Army must remove the rocks during the storm season, and thus worker safety from both waves and bluff failure becomes a significant issue. The Army's goal is to remove all rock above MLLW, with water quality and safety concerns as the only basis for not completely fulfilling its commitment. Considering the resource values of Monterey Bay and the fact that it is a high-energy wave environment, the concerns of the Army provide a legitimate basis for less than complete removal of the revetment. In order to consider any subsequent issues that might arise from the revetment removal activities, the Army has agreed to provide the Executive Director with a post-project report that describes the final conditions of the site, including the revetment area.

3. Conclusion. The proposed project will result in the removal of a revetment that prevents erosion of the bluffs seaward of the building. The removal of the revetment will result in the restoration of marine resources. It will return the beach and intertidal area to natural conditions and eliminate an existing structure that interferes with littoral processes. The Army will remove Stilwell Hall and its revetment using mitigation measures to minimize the amount of debris and other pollutants that are discharged into Monterey Bay. With these mitigation measures, the project will restore marine resources and littoral processes in a manner consistent with Sections 30230, 30231, and 30235 of the Coastal Act. Therefore, the Commission finds that the

proposed project is consistent with the Marine Resources and Water Quality policies of the CCMP.

B. Visual and Recreational Resources. Section 30210 of the Coastal Act provides that:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211 of the Coastal Act provides that:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30251 of the Coastal Act provides that:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

As described above, the proposed project involves the demolition of an existing building, revetment, and other related facilities. The building is one of the few existing structures west of Highway 1 on Fort Ord and is a large facility within that viewshed. In addition, the revetment is a large structure on the beach that degrades beach views and interferes with public access along the shoreline. The removal of these structures will restore natural views of the coast and improve shoreline access.

As a military facility, the Army has historically prevented public access to and recreational use of its beaches for military security reasons. However, the Army has closed the base and developed a re-use plan that would transfer most of the base to non-military uses. The Commission reviewed and concurred with a consistency determination for the base closure and reuse plan, CD-16-94. In that plan, the Army proposed to transfer all of the property to California Department of Parks and

Recreation (State Parks). That transfer is proceeding and will occur after several hazardous waste sites are cleaned and Stilwell Hall and its revetment are removed or relocated. If Stilwell Hall were to remain, once the Army transfers the land to State Parks, the building would be a hazard to people using the park and the revetment would interfere with public use of the beach.

Since the Army proposes to remove the building and the revetment, these hazards will be eliminated. The revetment represents a major interference with public access along the shoreline. This structure is an extensive mass of boulders that completely blocks access along the shoreline. Even during the summer season, it is an obstacle that must be circumvented and a hazard to anyone that attempts to scramble over or around the boulders. During the Oregon-Mexico Coastwalk in August 1996, the expedition found that this revetment was the only physical obstacle to a continuous beach walk from Moss Landing to Monterey, a distance of more than 14 miles. The proposed removal of the revetment will eliminate this extensive interference with public access along the beach.

In addition, the revetment represents a major structure that degrades the visual character of the beach. (Several storm-drain outfalls along the beach also degrade visual resources.) The proposed project will remove this structure, and thus improve the visual resources of the shoreline.

The removal of Stilwell Hall, however, raises a complicated question with respect to visual and recreational resources. As described above, Stilwell Hall is a 52,000 square-foot building that affects the views of the coast from Highway 1 and alters the natural character of the area. However, the building has been in this location since 1943 and is part of the visual character of the area. In 1993, the building became eligible for inclusion on the National Registry of Historic Places, although it has not been nominated. Because of its historic significance the building is part of the visual character of the area and its removal will change that character. In addition, the building may have some recreation value in itself. In 1999, State Parks requested that the Army halt the proposed demolition and re-program the funds toward relocation of the building 700 feet inland and allow the building to be part of the future state park for use. More recently, however, State Parks has changed its position. In a letter dated April 29, 2002 (Exhibit 5), State parks stated that:

We have been in support of preservation of the building and have taken a leadership role in working toward its relocation and restoration for many years. Unfortunately, despite the best efforts of many, we have concluded that preservation of the building does not appear to be feasible. Absent timely removal or relocation of the building, we support its removal so that the shoreline can be restored and the land transferred to the State for public uses.

In January 2000, the Commission's Executive Director objected to a negative determination by the Army for the proposed demolition of Stilwell Hall. That objection was based in part on the recreational value of the building. Specifically, the Executive Director concluded the following:

First, the building proposed for removal is a historic structure that the Department of Parks and Recreation has identified as a potential public recreational resource. State Parks has requested that the Army consider relocating the building so that it can be used as a visitor center and museum when the area is transferred to State Parks. It is the Commission staff's understanding that the State Parks has agreed to provide additional money to support the relocation effort. Therefore, the Commission staff concludes that Stilwell Hall is a potential recreational resource and its demolition will prevent the realization of the recreational benefits this resource can provide.¹

The preservation of the building can only be accomplished if it is relocated. In its current location, the building will not survive. The Army estimates that the bluff is eroding at a rate of seven feet per year and portions of the southwest corner of the building extend over the top of the bluff. Without some action taken to protect the building, natural forces will result in its collapse into Monterey Bay. If erosion becomes the instrument for the demolition of the building, a significant amount of debris, some of which is contaminated with lead paint and asbestos, would be discharged into Monterey Bay with adverse affects to marine resources.

Relocation is the only option that can protect the building from destruction. However, relocation is significantly more expensive than demolition. The Army estimates that demolition will cost approximately \$2,500,000 and that relocation would cost approximately \$20 million. In 1999, State Parks had agreed to contribute \$3,000,000 for the relocation of the building. In addition, the Army agreed that if adequate money could be raised, it would use the demolition appropriations for relocation. Interested community members attempted to raise the funds necessary to allow for relocation. The community group has not yet raised sufficient capital and, because of state budget issues, State Parks has retracted its offer. Therefore, at this point in time, it does not appear that relocation of the building is economically feasible. Although the Commission understands that the people interested in preserving Stilwell Hall continue to search for money and have put forth a plan to use it as a train station, park headquarters, and Monterey Bay Sanctuary's interpretive center, the finances to support this proposal are not currently available. Also, the Army has not completed any plans, environmental review, or permits for relocation. Therefore, relocation is unlikely to occur in the near future. However, natural forces continue to erode the bluff adjacent to the building and the threat of the building collapsing into Monterey Bay continues to

¹ ND-069-99, Objection Letter, January 4, 2000.

exist. In addition, the abatement of the hazard from the building and its revetment is one of the significant issues that is delaying the transfer of this portion of Fort Ord to State Parks.

Although the Commission would rather see the historic, visual, and recreational value of Stilwell Hall preserved, neither its relocation nor its preservation in its current location appears feasible at this time. In addition, despite this resource loss, the proposed project will restore the natural character of the area, which is consistent with Section 30251 of the Coastal Act. Finally, the removal of the revetment, which cannot occur until after the building is moved or demolished, will restore visual resources of the beach and remove a significant obstruction to public access and recreation. In conclusion, the Commission finds that: 1) relocation of the building does not appear feasible; 2) the project will restore the natural character of the area; and 3) the removal of the revetment will improve the visual resources of the beach and enhance public access along the shoreline. Therefore, the Commission finds that the building demolition is consistent with Sections 30211, 30212, and 30251 of the Coastal Act, and thus consistent with the Access and Visual Policies of the CCMP.

C. Environmentally Sensitive Habitat Areas. Section 30240(b) of the Coastal Act provides that:

Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Stilwell Hall is located within historic coastal dune habitat, which is Environmentally Sensitive Habitat (ESHA) as defined by the Coastal Act. In the environmental assessment for the proposed demolition, the Army describes the habitat value of this area as follows:

The former Fort Ord coastal zone is considered an environmentally sensitive area. Endangered, threatened, and rare vegetation and wildlife species are present. Much of the area is dominated by disturbed vegetation resulting from small arms firing range development and environmental remediation projects associated with base closure. Coastal strand communities are present along the shoreline....

Dune communities characterize the area adjacent to the project site and within the Army's coastal property west of State Highway 1. Four principal vegetation cover types are associated with the former Fort Ord coastal zone. The types are as follows: (1) Exotic Dune, (2) Disturbed Dune, (3) Coastal Strand, and (4) Coastal Dune. Much of the native dune vegetation is supplanted by non-native African ice plan. The native vegetation remains adapted to harsh environmental conditions from salt

spray, strong winds, shifting sand, and low moisture. Effects are underway to reestablish local native plants on the sand dune and throughout the coastal zone.²

The Commission agrees with the Army's assessment of this area and finds that most of this area is an ESHA. However, the habitat value of the Stilwell Hall site has been eliminated by the construction of the building, parking areas, roads and fences. These hardened surfaces do not provide any habitat value and they interfere with the natural processes of the dunes that surround the building and its associated facilities. Therefore, the Commission concludes that the project site is not an ESHA, but it is located immediately adjacent to sensitive dune areas. As such Section 30240(b) of the Coastal Act provides the Commission with standards for evaluating the project's effects on ESHA.

As required by Section 30240(b), the proposed removal of Stilwell Hall will not degrade the adjacent ESHAs and will be compatible with the continuance of that habitat resource. The removal of the building and its associated facilities will eliminate an artificial structure within the dunes, whose construction resulted in the loss of dune habitat. These facilities also interfere with the natural movement of the dune sand and the processes that are necessary for the dunes to exist. Thus by removing these structures, the Army will allow the dunes to function more naturally. In addition, based on concerns raised by the Commission, the Army has modified its project to provide for the restoration of habitat resources within the area affected by Stilwell Hall. The Army proposes to work with State Parks to re-vegetate the area with native vegetation. This process is consistent with other restoration efforts occurring within the coastal areas of the former Fort Ord. Therefore, the proposed activity will result in the restoration of ESHA resources, and thus the project will not interfere with adjacent sensitive resources and will be compatible with the continuance of these habitat values.

In addition to the adjacent dune resources, the area near Stilwell is an ESHA because it supports nesting habitat for the western snowy plover, a federally listed threatened species. Although the bird does not nest within or immediately adjacent to the Stilwell Hall site, construction noise associated with the demolition could disturb the nesting birds and interfere with nesting behaviors. To avoid this potential impact, the Army proposes to conduct the demolition of the building and the removal of the revetment during the non-nesting season, October through February. Therefore, the Army will avoid any impacts to nesting plovers, and thus will be consistent with the requirements of Section 30240(b) of the Coastal Act.

In conclusion, the Commission finds that the proposed demolition will occur adjacent to ESHAs and will restore the habitat values of the building site, and thus will enhance the ESHA values of the area. In addition, the project will avoid impacts to nesting snowy

² Environmental Assessment, June 25, 1999, p. 10.

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U.S. Army, Stilwell Hall Demolition

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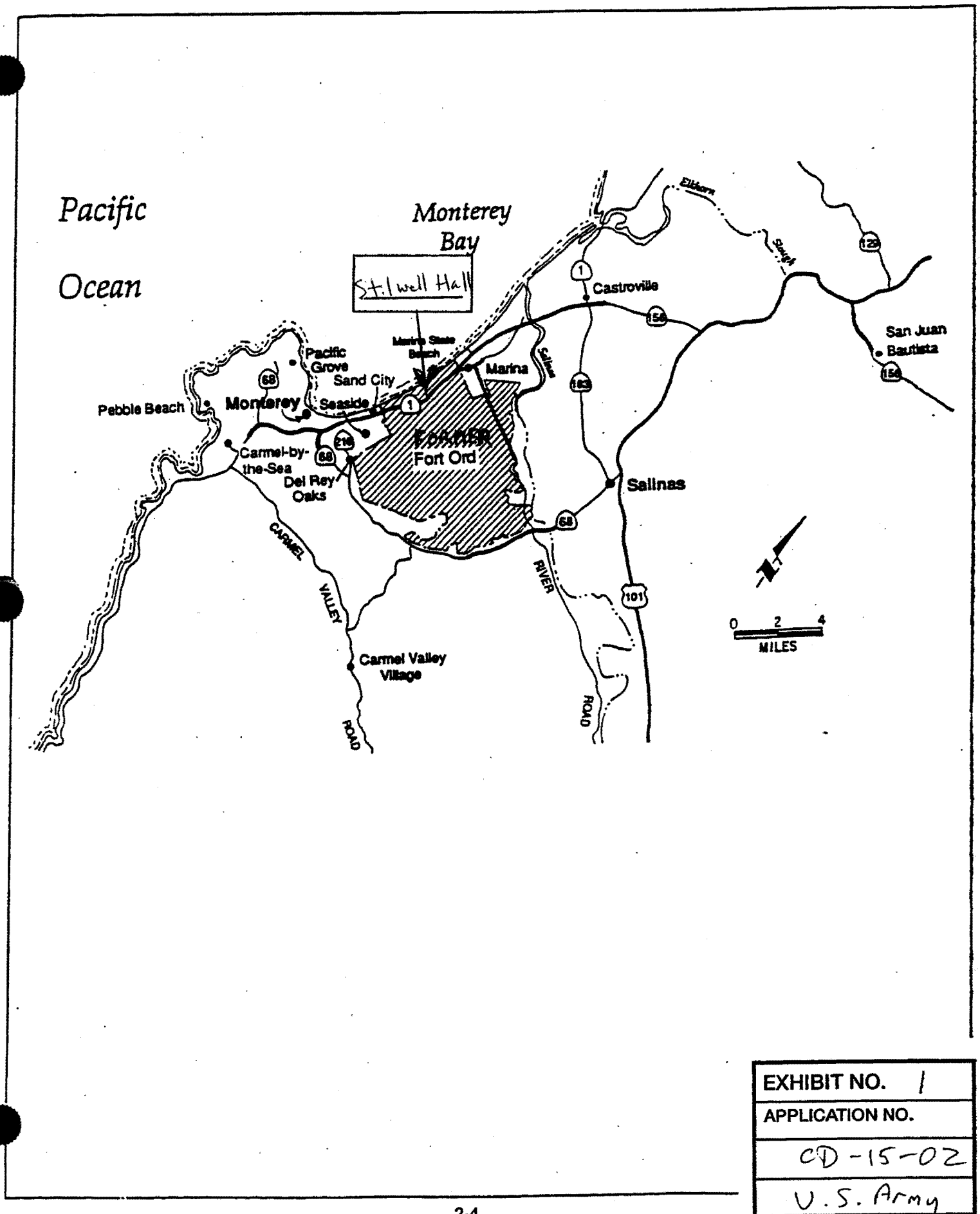
plovers. Therefore, the Commission finds that the proposed project is consistent with Section 30240(b) of the Coastal Act, and thus is consistent with ESHA policy of the CCMP.

VII. Substantial File Documents

1. CD-16-94, U.S. Army, Closure and Re-use of Fort Ord, Monterey County.
2. ND-069-99, U.S. Army, Demolition of Stilwell Hall.
3. Draft Final Environmental Assessment/Finding of No Significant Impact Stilwell Hall Demolition Project, June 1999.



Figure 2-2
Location of Cities Surrounding Fort Ord



Local Jurisdictional Boundaries Surrounding Fort Ord

Figure 2-5

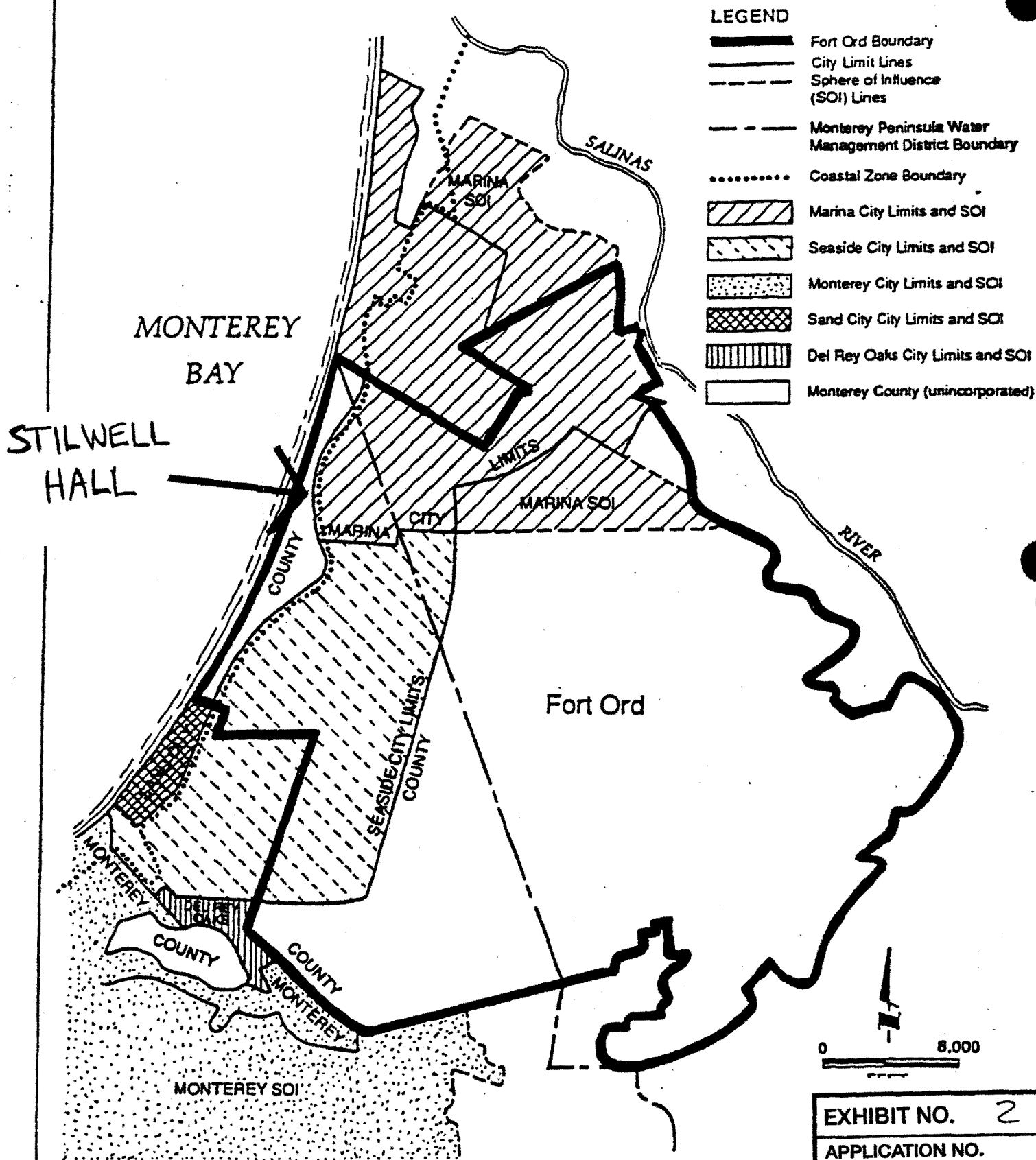
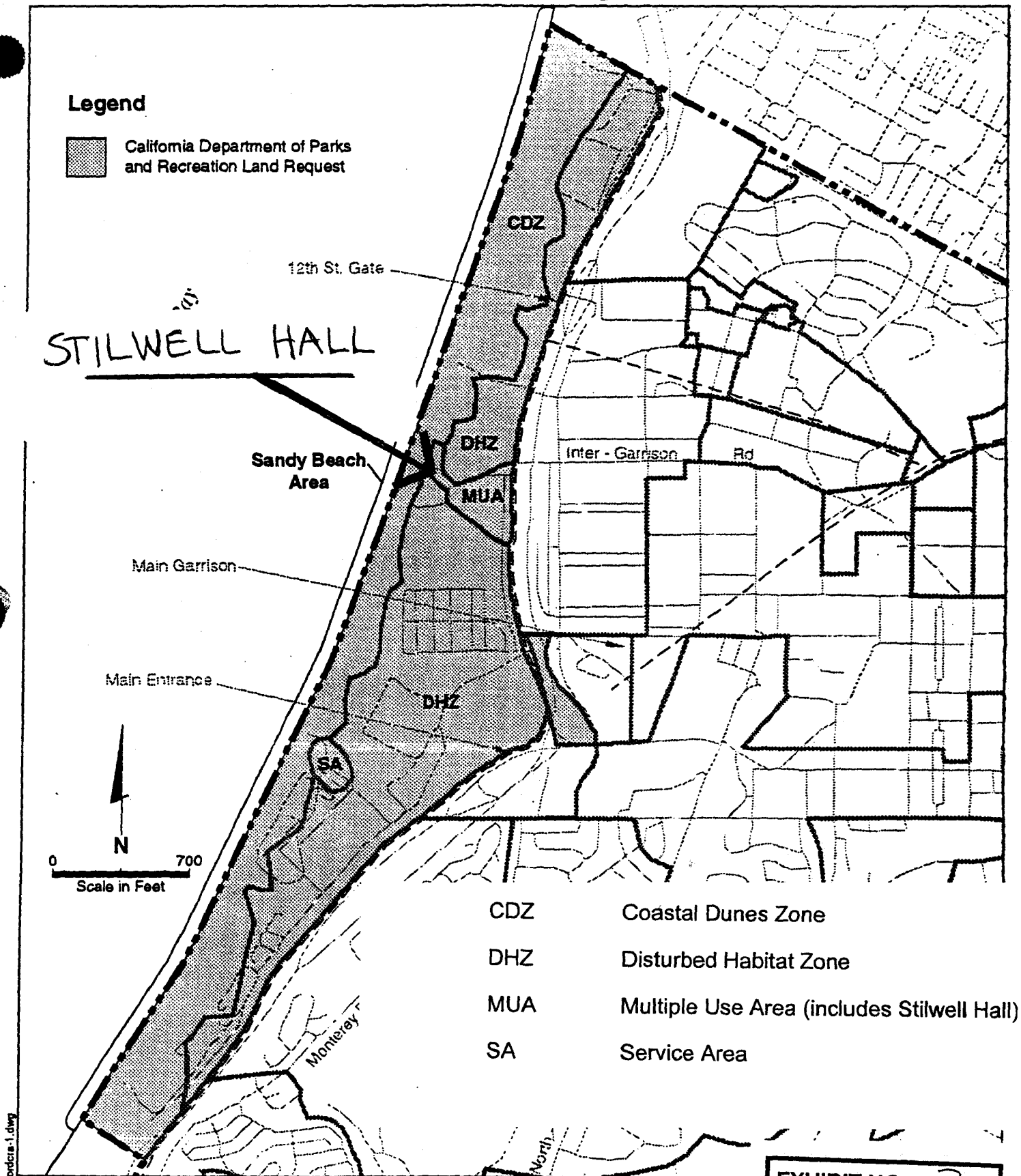


EXHIBIT NO.	2
APPLICATION NO.	
	CD-15-02

Figure 10
CDPR Designations for the Fort Ord Coastal Zone



JONES & STOKES ASSOCIATES
2600 V STREET
SACRAMENTO, CA 95818



US ARMY CORPS
OF ENGINEERS
SACRAMENTO DISTRICT

EXHIBIT NO. 3

APPLICATION NO.

CD-15-02



Photo 1. Aerial photo showing Stilwell Hall and extent of rock riprap.

EXHIBIT NO. 4

APPLICATION NO. CD-015-02



DEPARTMENT OF PARKS AND RECREATION

Rusty Areias, Director

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April 29, 2002

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CALIFORNIA
COASTAL COMMISSION

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Consistency Determination Number CD-015-02; Agenda Item F8a; May 10, 2002

California State Parks is in concurrence with the staff recommendation in support of the Army's proposal regarding Stilwell Hall. State Parks staff have been working with the Army, other agencies, local government and community groups for over 10 years in preparation for transfer of the 4 miles of shoreline and over 880 acres of the former Fort Ord to the State of California. This property will become Fort Ord Dunes State Park and become available for coastal access and other public uses.

The fate of Stilwell Hall has been one of the most challenging issues we have faced in preparing for establishment of this new State Park. We have been in support of preservation of the building and have taken a leadership role in working toward its relocation and restoration for many years. Unfortunately, despite the best efforts of many, we have concluded that preservation of the building does not appear feasible. Absent timely removal or relocation of the building, we support its removal so that the shoreline can be restored and the land transferred to the State for public uses. Our basis for this conclusion is summarized as follows:

- Prolonged, additional study or indecision may result in no action, leaving the future of the site undetermined indefinitely. The Army currently has funding available and we would like to see the matter resolved so the property can be transferred.
- If nothing is done the building will eventually begin to break-up with pieces falling into the marine sanctuary. The latest engineering report from the Army advises that the building is subject to imminent failure with adverse weather conditions.
- The cost of relocation and rehabilitation is very high, over \$20 million. Fundraising efforts over several years have not been successful. A viable strategy for securing the necessary funds has not been identified.

EXHIBIT NO. 5

APPLICATION NO. CD-015-02



California Coastal Commission

State Parks recommends that the Coastal Commission concur with the consistency determination. If you have any questions about this matter please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn Rhodes".

Lynn Rhodes
District Superintendent

cc: Ruth Coleman
William Berry
George Cook
Col. Kevin Rice
Tami Grove
James Reeves