

# MEMORANDUM

January 5, 2018

TO: Hank Seemann, Deputy Director - Environmental Services  
Humboldt County Public Works Department

FROM: Christopher McMorris, Partner / Architectural Historian, JRP Historical Consulting, LLC  
Jamie Roscoe, Principal / Archaeologist, Roscoe & Associates

RE: Historical Resources / Cultural Resources Compliance under California Environmental Quality Act for Humboldt Bay Trail South Project, Humboldt County, California

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JRP Historical Consulting, LLC (JRP) and Roscoe & Associates (Roscoe) prepared cultural resources documentation for Humboldt County's Humboldt Bay Trail South Project, which is a local assistance project with the California Department of Transportation (Caltrans). The project proposes to develop an approximately 4.2-mile bike path to connect the southern terminus of the City of Arcata's Humboldt Bay Trail North with the City of Eureka's Waterfront Trail.

To date, JRP has prepared a Historical Resources Evaluation Report (HRER), Roscoe has prepared an Archaeological Survey Report (ASR), and they jointly prepared a Historic Property Survey Report (HPSR), which is a summary document regarding the cultural resources findings. These documents were prepared following Caltrans' guidelines in the department's *Standard Environmental Reference*. JRP addressed historic architectural / built environment resources and Roscoe addressed archaeological resources. The HPSR / HRER / ASR was prepared for project compliance under Section 106 of the National Historic Preservation Act.

The HPSR / HRER / ASR also provided data and analysis for the County's compliance with Section 15064.5 of the California Environmental Quality Act (CEQA) Guidelines. Historical resources are recognized as part of the environment under CEQA, as per California Public Resource Code, (PRC) 5020.1, 5024, 5024.1, and 21084.1. Historical resources include both historic architectural / built environment resources and archaeological resources. CEQA requires an analysis of impacts to historical resources as per PRC Section 21000 et seq. and the California Code of Regulations (14 CCR Section 15000 et seq.). CEQA also requires identification of and assessment of impacts to unique archaeological resources, as per PRC Section 21083.2 and CEQA Guidelines Section 15065.

## **Research Methods**

For the HRER, JRP conducted research at the Humboldt State University Library and Humboldt Room, Arcata; Eureka Main Branch Library Humboldt Room; Humboldt County Historical Society, Eureka; Humboldt County Public Works Department, Environmental Resources Division, Eureka; Humboldt County Recorder's Office, Eureka; Humboldt County Assessor's Office, Eureka; Humboldt County Planning and Building Department, Eureka; Shields Library at University of California, Davis; California State Library; and in JRP's in-house library. In addition, JRP examined standard sources of information that identify known and potential historic resources to determine whether any buildings, structures, objects, districts, or sites had been previously recorded or evaluated in or near the project. This included review of the California Historical Landmarks and Points of Interest publications and updates, National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and Caltrans Historic Bridge Inventory, and Eureka's Local Register of Historic Places. Additional background research was done through ParcelQuest commercial real estate database, review of historic and current USGS topographic maps, and other sources to confirm dates of construction of properties in the Area of Potential Effects (APE). JRP also reviewed the results of the record search that was conducted at the Northwest Information Center (NWIC), Sonoma State University, on October 5 & 20, 2017, along with previous studies that evaluated built environment resources in or near the project area.<sup>1</sup>

For the ASR, Roscoe conducted background research at the NWIC in Rohnert Park, and at the Caltrans District 1 and District 3 offices. The following inventories were reviewed: the Historic Property Directory, NRHP, Determinations of Eligibility for NRHP, CRHR, the California Inventory of Historic Resources, and the Caltrans Historic Bridge Inventory. Correspondence was also conducted with representatives of local Native American tribes and other knowledgeable individuals, in order to identify any Tribal cultural resources which may be present in the project vicinity.

## **Findings and Conclusions**

In the HRER, JRP evaluated two resources in the project's APE: the former Arcata Redwood Company, currently owned by California Redwood Company, at 5151 N US Highway 101, Eureka and a segment of the Northwestern Pacific Railroad (NWPRR) segment – now controlled by North Coast Railroad Authority (NCRA) – in the City of Eureka from Eureka Slough to near the intersection of 1<sup>st</sup> and Y streets. JRP concluded that neither of the resources meet the criteria for listing in the NRHP or CRHR, and that neither is eligible for the City of Eureka Local Register of Historic Places. Furthermore, the former NWPRR segment does not have the potential to be a

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<sup>1</sup> Northwest Information Center, Record Search File No. 17-1103, October 5, 2017; Northwest Information Center, Record Search File No. 17-1203, October 20, 2017.

contributor to any larger linear historic property or historic district. Three other historic-era resources in the APE had been previously evaluated and found ineligible for the NRHP and the CRHR, with State Historic Preservation Officer concurrence. These resources are the Bracut Industrial Park (Reference No. FHWA20150925002), a five-mile segment of the NWPRR (Reference No. FHWA061012), and a eucalyptus tree row located adjacent the California Redwood Company property (Reference No. FHWA061012A). These resources are located in an unincorporated area of Humboldt County, except for a portion of the NWPRR segment. Based on its ineligibility for the NRHP / CRHR, and the assessment of the adjacent segment, the NWPRR line is also not eligible for the City of Eureka Local Register of Historic Places. None of the resources in the APE evaluated in the current HRER or in previous studies are historical resources for the purposes of CEQA under Section 15064.5(a)(2)-(3) of the CEQA Guidelines, using the criteria outlined in PRC Section 5024.1. As all resources are not historical resources, no impacts analysis is required. Thus, the County's project will not impact built environment / architectural resources that could meet the criteria to be historical resources for purposes of CEQA compliance.

In the ASR, Roscoe presented information regarding the presumed location of Native American archaeological site CA-HUM-048, the former Wiyot village of *plets-wok* that was located near the southern end of the Bracut Industrial Park. This village, which was situated on the raised landform named Brainard's Point, was visited by Captain Johnathan Winship in 1806 and L.L. Loud in 1913, before the Point was first cut and then levelled for use in local construction projects in the mid-20<sup>th</sup> century.

Based on an analysis of Loud's field maps and historic and modern aerial imagery (Cardiff 2014: see ASR, Appendix C), it is believed that this site was partially situated within the APE for the proposed undertaking near the southern end of the Bracut Industrial Park. However, no evidence of the site has been reported since Loud's *Ethnogeography and Archaeology of the Wiyot Territory* was published in 1918, and the site is believed to have been destroyed during historic-era railroad and road construction projects.

No prehistoric or tribal cultural resources were identified within the project area during the field survey.