

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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July 13, 2017

In reply refer to: COE_2017_0130_001

Rick M. Bottoms, Ph.D. – Chief,
Regulatory Division
U.S. Army Corps of Engineers
San Francisco District
1455 Market Street
San Francisco, CA 94103-1398

RE: Section 106 Consultation for Georgia-Pacific Operable Unit E former wood products facility excavation and disposal activities at 90 Redwood Avenue in Fort Bragg, County, California (2009-00372N)

Dear Dr. Bottoms:

The Office of Historic Preservation (OHP) received your letter on June 12, 2017 continuing consultation on the Georgia-Pacific, LLC excavation and disposal project in Operable Unit E at the former wood products facility in Fort Bragg, Mendocino County, California. The U.S. Army Corps of Engineers (COE) is consulting with OHP to comply with Section 106 of the National Historic Preservation Act of 1966 (as amended) and its implementing regulations at 36 CFR Part 800. The COE is requesting review and concurrence on their Area of Potential Effects (APE), adequacy of their historic property identification efforts, and finding of no adverse effect to historic properties, as detailed in the following documents:

- *Operable Unit E Soil and Sediment Removal Action on the Former Georgia-Pacific Wood Products Facility in Fort Bragg, Mendocino County Draft Cultural Resources Inventory Report and Finding of Effect (ESA, April 2017)*
- Appendices and Attachments to ESA 2017
- *Transitions over Time: A Chronological Perspective of the Union Lumber Company Lumber Mill, Fort Bragg, Mendocino County, California (Garcia and Associates 2008)*
- Copies of Native American consultation correspondence

The COE is proposing to issue a permit under Section 404 of the Clean Water Act Georgia-Pacific, LLC (Applicant) to remediate contaminated soils through excavations within 19 removal action areas (RAAs) within the Operable Unit-E (OU-E) of the former Georgia-Pacific Wood Products Facility. OU-E is comprised of approximately 12 acres of man-made ponds and seasonal wetland areas across 45 terrestrial acres. The COE has defined the Area of Potential Effects (APE) as the 19 RAAs, a 20-foot wide buffer around each RAA, an area for establishment of approximately 0.59-acres of wetland north of Pond 7, and three designated staging areas. OHP has no comment on the APE at this time.

The COE's letter states that 16 cultural resources investigations were conducted at the Facility between 1974 and 2011. As a result, the Georgia-Pacific Lumber Mill Historic District (P-23-004385) and the Fort Bragg Native American Archaeological District (P-23-004491), comprised of 22 prehistoric archaeological sites, were recorded at the Facility and the immediate vicinity. According to the COE's letter, none of the contributing elements of the Fort Bragg Native American Archaeological District are located within the APE, although the APE is within the District's boundaries. The Georgia-Pacific Lumber Mill Historic District was originally recorded by TRC in 2003 as containing 22 contributing buildings and structures. It appears that the District was never evaluated through the Section 106 consensus process with this office, but was recommended eligible for listing on the National Register of Historic Places (NRHP) through an evaluation that was made under the California Environmental Quality Act (CEQA). Since the initial recording, 21 of the buildings have been demolished and the only remaining structure is Dry Shed #4, which is located outside of the APE. The COE is currently recommending the Georgia-Pacific Lumber Mill Historic District not eligible for listing on the NRHP due to lack of integrity.

Additional historic property identification efforts were conducted by ESA for the present undertaking and included a records search at the Northwest Information Center, a pedestrian survey of the APE, and excavation of 13 shovel test pits (STPs) in the vicinity of the proposed RAAs, in consultation with a Native American monitor with the Sherwood Band of Pomo Indians. No additional archaeological or historic resources were identified as a result of these efforts. The excavated STPs indicated that the proposed RAAs contain artificial fill or disturbed sediments. No STPs were excavated within the ponds or riparian area.

The COE contacted the Native American Heritage Commission (NAHC) and received a response on October 10, 2016 stating that a search of the Sacred Lands File yielded negative results within the APE. The Corps sent letters to the Native American contacts provided by the NAHC on November 04, 2016. The Sherwood Valley Band of Pomo Indians responded with a letter on December 01, 2016, which stated the importance of the project area as it is within the former Mendocino Reservation and that the project is located within an eligible archaeological district. A tribal monitor was present for excavation of the STPs for the current undertaking. The Sherwood Valley Band of Pomo Indians has also been consulting with the City of Fort Bragg for several years, and has been working with Georgia-Pacific and the California Department of Toxic Substance Control on a cultural resources protection plan for the Facility.

Based on the information provided, the COE are requesting concurrence on the adequacy of their historic property identification efforts and their finding of no adverse effect to historic properties for this undertaking. The following comments are provided:

- Pursuant to 36 CFR 800.4(b), the historic property identification efforts carried out for this undertaking appear to be adequate.
- The COE is proposing to treat the Fort Bragg Native American Archaeological District (P-23-004491) as eligible for the NRHP for the purposes of Section 106 for this undertaking. I do not object.

- Pursuant to 36 CFR 800.4(c)(2), the COE has recommended the Georgia-Pacific Lumber Mill Historic District (P-23-004385) as not eligible for listing on the NRHP, due to lack of integrity as most of the buildings are non-extant. I concur.
- Be advised that any unanticipated discoveries, including archaeological materials associated with the Georgia-Pacific lumber mill, that may be discovered during project implementation will need to be recorded and evaluated for their NRHP eligibility in consultation with OHP, pursuant to 36 CFR 800.13(b).
- It appears that no contributing elements of the Fort Bragg Native American Archaeological District are present within the APE and will be impacted by the undertaking, therefore **I concur** with the COE's finding of *no adverse effect*, pursuant to 36 CFR 800.5(b).

Be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, the COE may have additional future responsibilities for this undertaking under 36 CFR Part 800. For more information or if you have any questions, please contact Koren Tippett at (916) 445-7017 or koren.tippett@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer