

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

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March 17, 2011

In Reply Refer To: FHWA110222A

Deborah Harmon
Department of Transportation
District 1
P.O. Box 3700
Eureka, CA 95502-3700

Re: HPSR and Finding of Effect for the Fort Bragg Coastal Trail Project in the City of Fort Bragg, Mendocino County, California

Dear Ms. Harmon:

Thank you for seeking my consultation regarding the above noted undertaking in accordance with the *Programmatic Agreement (PA) Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal-Aid Highway Program in California*. Pursuant to Stipulation VIII of the PA, the California Department of Transportation (Caltrans) has determined the Area of Potential Effects (APE) and has completed identification and evaluation of historic properties within the APE.

The undertaking consists of constructing 4.5 miles of multi-use trails and pedestrian trails. Forty five acres of habitat restoration will also be conducted. This will also include grading, utility trenching, extending Elm Street, constructing parking lots, constructing pit toilets, cable stairways, viewing platforms, benches, drainage improvements, fences, removal of invasive species and the planting of native vegetation.

You are requesting my concurrence, pursuant to Stipulation VIII.C.5 of the PA, on your determination of eligibility, for the National Register of Historic Places (NRHP), of 37 historic properties identified within the APE. In addition to your letter of February 17, 2011, you have submitted the following documents in support of this undertaking:

- *Combined Historic Property Survey Report and Finding of Effect for the Fort Bragg Coastal Trail Project in the City of Fort Bragg, California* (Thad Van Buren, January 2011)

As documented in the report noted above, Caltrans has identified 23 archaeological sites within the Area of Potential Effects, 16 of which are within the Area of Direct Impacts. Of those 23 sites, 22 are identified as the Fort Bragg Native American Archaeological District and one site is a historic shack that could not be accessed. The Fort Bragg Native American Archaeological District has been found eligible based on

criteria A and D for the ability to convey the development and broad patterns of the Northern Pomo community in this area. The report also identified fifteen buildings as part of the Union Lumber Company Mill Complex. There were also six properties identified as categorically ineligible for the NRHP based on Attachment 4 of the PA. Native American consultation is ongoing for this project.

Based on my review of your letter and supporting documentation, I have the following comments:

- 1) I concur that all fourteen buildings, collectively known as the Union Lumber Company Mill Complex, are not eligible.
- 2) I concur that the 22 archaeological sites (CA-MEN-119, -407, -408, -409/H, 410, -411, -3137, -3138/H, -3140, -3325, -3328H, -3365, -3394, -3472, -3476, 3393, -3473, -3474, -3475/H, -3477, -3478 and P-23-4355) are eligible as part of the Fort Bragg Native American Archaeological District under criteria A and D for its shaping of broad patterns across time of the Northern Pomo community in this area, which still exists today. Unfortunately, no discussion was made for the individual eligibility for most of these sites with exception of CA-MEN-1199H.
- 3) I concur with your finding that CA-MEN-1199H, the Noyo Point Cemetery is individually eligible for the NRHP based on its potential for information about social adjustments relating to the adjustment period of the indigenous population to settlement in the 1850s and 1880s. Please be aware that the boundaries of a cemetery may expand beyond those currently fenced and mapped. The cemetery contains both Native American and Euro American burials.
- 4) Two sites, CA-MEN-1821 and the Steam Donkey Sled could not be located and may no longer exist within the APE.
- 5) I concur with the approach of assuming the Gus West Island Site (CA-MEN-3139H) eligible for the NRHP and avoiding the site through an Environmentally Sensitive Area.
- 6) I concur with your finding that there will be an adverse effect to 15 of the contributing sites to the Fort Bragg Native American Archaeological District, therefore constituting an adverse effect to the district for this undertaking, however a more complete description of the nature of the adverse effects will be necessary to better guide mitigation discussions.

I look forward to continuing consultation. If you require further information, please contact Trevor Pratt of my staff, at phone 916-445-7017 or email tpratt@parks.ca.gov.

Sincerely,

Susan H Stratton for

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer