

CHRIS JOHNSON HAMER
ERIC V. KIRK
JASON J. EADS
JOSHUA KAUFMAN
JEFFREY W. MONSELL

JOHN R. STOKES, III *RETIRED

THOMAS D. ROWE (1948-2011)
JOHN R. STOKES (1917-2001)
DOROTHY L. STEEVES (1926-1996)

STOKES, HAMER, KIRK & EADS, LLP
ATTORNEYS AT LAW
A LIMITED LIABILITY PARTNERSHIP

381 BAYSIDE ROAD, STE. A
ARCATA, CALIFORNIA
95521

AREA CODE 707

TELEPHONE
822-1771

FAX 822-1901

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VIA E-MAIL ONLY

Humboldt County Planning Commission
3015 H St.
Eureka, California 95501
Attn: Planning Clerk planningclerk@co.humboldt.ca.us
Alan Bongio alanbongio@gmail.com
Thomas Mulder hrh707@outlook.com
Noah Levy 3noah@landwaterconsulting.com
Mike L Newman 4hcpcnewman@yahoo.com
Brian Mitchell mbrian707@gmail.com
Melanie McCavour hcpcmccavour@gmail.com
Peggy O'Neill sregon@aol.com

Re: Old Arcata Road Rehabilitation and Pedestrian/Bikeway Improvements Coastal Development Permit; Bayside Area; Record Number PLN-2022-1764 (filed 2/28/2022) Meeting Date: May 5, 2022 at 6 p.m.

Objection Based Adverse Effect on Historic Structures

Dear Members of the Humboldt County Planning Commission:

On behalf of Bayside Cares, we are writing to request that the Humboldt County Planning Commission deny approval of a Coastal Development Permit for the above-referenced Project because of the disastrously adverse effects the proposed Project will have on the valuable historic resources in the Project area, including many buildings in the National Register.

The Humboldt Bay Area Plan of the Humboldt County Local Coastal Program (hereinafter referred to as the "Coastal Plan") prohibits you from approving any Project which does not comply with the Coastal Plan. (Chapter 1, pg. 1, section 1.10)

Chapter 3, page 1 of the Coastal Plan, states: "the Coastal Act requires that all development be subject to standards designed to protect natural and cultural resources, as well as to protect public safety."

Section 3.18 requires mitigation measures if historic resources are adversely affected by the Project. (Chapter 3, pg. 26, section 3.18)

Old Arcata Road Rehabilitation and Pedestrian/Bikeway Improvements Project (hereinafter, the "Project"), adversely affects historic resources in overwhelmingly negative ways.

There are 2 buildings listed in the National Register and 4 properties, including the 1882 Temperance Hall, which are eligible to be listed in the National Register, just in the immediate vicinity of the intersection of Old Arcata Road and Jacoby Creek Road, where a large, urban traffic circle, also known as a roundabout, will be constructed if the Project is approved.

There are eight 19th century and early 20th century properties in the Project area that were determined by historian, Susie Van Kirk, in 1974, to be eligible for the National Register: 1750, 1752, 1734, 1703, 1428 and 1171 Old Arcata Road, 12146 Anvick Road, and the 3 C's Barn in the Bayview Conservation Area.

There are many more structures that historian, Kathleen Stanton, found to be of sufficient age to be considered for the National Historic Register: 1775, 1766, 1696, 1570, 1560, 1550, 1546, 1500, 1440, 1420, 935, 945, 963, 971, 991, 1149, 1129, 1215, 1230, 1285, 1641, 1651, 1671, 1727, 1759 and 1785 Old Arcata Road.

The Project Area is the area historically known as "Bayside Corners", which is itself rich in local history. The U.S. Secretary of the Interior's Standards recognize roads, streets, circulation systems and open space as critical landscape features in a historic setting.

Verification of all of the foregoing is found in the report and comments by historian, Kathleen Stanton.

The Project Area has such a high density of historic structures that it is worthy or preservation as a historic district.

The Project involves constructing a roundabout, otherwise known as a traffic circle, at the intersection of Old Arcata Road and Jacoby Creek Road, close to these historic structures.

The roundabout is to be constructed close to the Old Jacoby Creek School House, which is listed in the National Register of Historic Places, and the Old Grange, a California Registered Landmark found eligible for the National Register, the Temperance Hall, which has been found eligible for the National Register, and the Orr House at 2332 Jacoby Creek Road, which is listed in the the National Register.

The roundabout will adversely affect the historic setting, context and significance of this large number of historic structures, and particularly those closest to the roundabout. The roundabout is a large, modern feature that is an intrusive element to the historic environment by its sheer size and accompanying features which include five street lights, medians, numerous signs and directional arrows, blinking lights for pedestrians, and a massive amount of concrete. It will displace the existing intersection of Jacoby Creek Road and Old Arcata Road, which has had its present configuration since 1946, and which is a critical landscape feature in a historic setting, under U.S. Secretary of the Interior's Standards.

The Project eliminates much open space and brings traffic much closer the Temperance Hall (bringing it to within 35 feet of Old Arcata Road), and much closer to the Old Jacoby Creek School House (bringing it to within 79 feet of Old Arcata Road).

The Project destroys the historic view of these historic structures, and from these historic structures. Light pollution from the five street lights and the beams from vehicles using the roundabout, will further destroy the historic setting, context and feeling of the historic structures and of the area. The lights from the oncoming traffic in the roundabout will be directed to the windows of the Old Jacoby Creek School House, which is presently being put to both residential and commercial use. This will adversely impact both the residential and commercial tenants of the property.

The Project **does not include any measures to mitigate these adverse effects** on the many historic resources in the Project area, and does not even acknowledge the adverse effects. The City has claimed the entire project is within the public right-of-way, and so has analyzed only the portions of parcels of land which will have road, sidewalk or bike lane on them, and has not analyzed the rest of the parcels, which contain the historic structures, so valuable to the cultural heritage of this area.

Conclusion

The Humboldt Bay Area Plan of the Humboldt County Local Coastal Program, (hereinafter referred to as the “Coastal Plan”) prohibits you from approving any Project which does not comply with the Coastal Plan. (Chapter 1, pg. 1, section 1.10)

Chapter 3, page 1 of the Coastal Plan, states: “the Coastal Act requires that all development be subject to standards designed to protect natural and cultural resources, as well as to protect public safety.”

Section 3.18 requires mitigation measures if historic resources are adversely affected by the Project. (Chapter 3, pg. 26, section 3.18)

As set forth above, historic resources are adversely affected by the Project and there are no mitigating measures.

On the basis of the foregoing, the Planning Commission must deny approval of a Coastal Development Permit for the Project.

Very truly yours,

STOKES, HAMER, KIRK & EADS, LLP

Chris Johnson Hamer

By: _____
Chris Johnson Hamer