

## Attachment E

Updated Historical Evaluation Form for Eucalyptus Trees (JRP, 2018)  
and Concurrence Letters from the State Historic Preservation  
Office (2006 and 2018)

**P1. Other Identifier:**

\*P2. Location:  Not for Publication  Unrestricted \*a. County: Humboldt

\*P2 e. Other Locational Data: Located 0.33-miles east of the intersection of US Highway 101 and Jacobs Avenue, just north of Eureka, to approximately 0.25-miles west of the intersection of US Highway 101 and the Indianola Cutoff.

\*P3a. Description: The primary change to this resource since its last recordation in 2003 is the removal of seven trees on the west end of the west section, near Murray Field County Airport in 2012.<sup>1</sup>

\*P3b. Resource Attributes: (HP 30) Trees/Vegetation

\*P8. Recorded by: Heather Miller & Shelby Kendrick, JRP Historical Consulting, LLC, 2850 Spafford Street, Davis, CA 95618

\*P11. Report Citation: JRP Historical Consulting, LLC, "Historical Resources Evaluation Report, Humboldt Bay Trail South, City of Eureka, Humboldt County, California," prepared for Humboldt County Public Works and Caltrans District 1, 2018.

\*B10. Significance: This form is an update of a discontinuous eucalyptus tree row located along US Highway 101 just north of Eureka (**Photograph 1**). The 1.25-miles long row contains approximately 600 mature eucalyptus trees with a 650-foot break at the entrance of the former Arcata Redwood Company property (now California Redwood Company), which creates west and east sections of the tree row (**Photographs 1-3**). The trees are *Eucalyptus globulus*, also referred to as Tasmanian blue gum or blue gum. The tree row was previously recorded and evaluated in 2003 by JRP Historical Consulting (see attached). JRP concluded that the row was not eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR). The California State Historic Preservation Officer (SHPO) concurred with this conclusion on November 29, 2006 (Reference No. FHWA20150925002). This update recordation and evaluation of the property was undertaken because of historical information that has emerged since 2006 about the origin of the tree row and to reevaluate the resource within this new context.

Historic Context

The previous recordation estimated that the trees were planted between 1919 and 1925 by the California Division of Highways as part of construction of the new highway connecting Eureka and Arcata and were sourced from a Division of Highways nursery. In September 2007, the Eureka Heritage Society sent a letter to Caltrans office in Eureka in as part of the environmental compliance process for the Eureka-Arcata Route 101 Corridor Improvement Project stating that the trees were planted before construction of the highway as a windbreak for ranch properties.<sup>2</sup> On November 16, 2008, the *Times-Standard* printed an article about the tree rows that cited a 1925 *Humboldt-Standard* article that stated the trees were planted by Henry M. Devoy without the highway commission's consent and were mature when the Division of Highways threatened to cut them down in 1925. The article also stated that the trees were sourced as seedlings from the Cottage Gardens Nursery located in Eureka.<sup>3</sup> An article published by *North Coast Journal* on January 8, 2009 confirmed that Devoy planted the trees citing a statement by Devoy's 96-year old granddaughter that Henry Devoy planted the tree row as a windbreak for three dairies he owned in the vicinity.<sup>4</sup> The historical record does not provide an exact date of when the trees were planted, but it is estimated they were planted between 1914 and 1919 between the time Devoy acquired the property to when construction of the highway began. The entire tree row was cut down in 1933 after a hard frost that swept through Northern California and killed many eucalyptus in the Eureka area. The trees were taken down to stumps, but grew back to the trees that stand today. A photograph from 1933 taken after the damaged tree row was cut down shows that the tree row was originally

<sup>1</sup> California Coastal Commission, Staff Report: Regular Calendar, W16b, Application No. 1-11-046, Filed March 11, 2012, available at <https://documents.coastal.ca.gov/reports/2012/4/W16b-4-2012.pdf>.

<sup>2</sup> U.S. Department of Transportation, et al. *Eureka-Arcata Route 101 Corridor Improvement Project, Humboldt County, District 1 – HUM – 101, PM 79.9/86.3, State Clearing House Number: 200109035, Final Environmental Impact Report/Statement, Volume 1 of IV, December 2016, 219.*

<sup>3</sup> Kathy Dillon for *Times-Standard*, "A Changing Landscape," November 16, 2008, 1.

<sup>4</sup> Heidi Walters for *North Coast Journal*, "O, Eucalyptus! Should They Stay or Should They Go?" January 8, 2009, available at <https://www.northcoastjournal.com/humboldt/o-eucalyptus/Content?oid=2128713>.

planted in two parallel rows, which was a common planting style for windbreaks (**Plate 1**). When the tree row grew back, it only grew as a single row.<sup>5</sup>

Henry Devoy purchased a 1100-acre property that fronted Humboldt Bay between Eureka and Arcata in 1914, which includes the property that is the site of the former Arcata Redwood Company (currently owned and referred to as California Redwood Company) along which most of the tree row is planted. This property had been swamp land that was reclaimed in the late nineteenth century. During his active management of the property in the 1910s, Devoy leased portions of his ranch to various individuals while maintaining a home ranch on Devoy Road (approximately 1.4 miles south of the tree row). One of the leased properties was a small dairy operation that was located on what would later become the Arcata Redwood Company. Devoy held large tracts of land throughout northern California, including 120-acres of Redwoods along the South Fork of the Eel River, near Cooks Valley, that he purchased in the early 1900s and named it "Henry Devoy Grove." Devoy used the location as a summer retreat and leased the land to Ed Freeman who built a cookhouse, cabins, tent platforms, and later a store and dining room. In 1922 the Save-the Redwoods League was concerned about plans to cut a highway through the area and convinced Devoy to transfer his 120-acres to the State to operate as a park. This initial 120-acre State park was dedicated in 1922 as Richardson Grove and would eventually grow to its current size of 1800-acres. Devoy retired from ranching by 1920 and his three children continued to run the home ranch north of Eureka. Devoy and his wife Ella moved to Alameda in 1925 where Henry died in 1933. Upon his death, their property, including the ranch north of Eureka transferred to Ella who used a deed of gift to distribute the property to their children and grandchildren in 1939. The Devoy heirs sold the "Henry Devoy Ranch" in 1943, which then consisted of approximately 750-acres to Charles L. and Dorothy N. East. Four years later the Easts sold approximately 109-acres to local mill owner Howard A. Libbey who later established a drying yard and remanufacturing plant as part of the Arcata Redwood Company.<sup>6</sup>

The choice of eucalyptus – and particularly *Eucalyptus globulus* – for windbreaks had a long history in California by the time the trees were planted on the Devoy ranch in the 1910s. Interest in and importing of eucalyptus trees from Australia to California as both an ornamental and commercial specimen began in the 1850s during the period the tremendous growth and business enterprise that accompanied the Gold Rush. Eucalyptus were attractive for their rapid growth and shade, as well as for their potential to counteract widespread deforestation that had already begun at the time. A eucalyptus tree industry developed in California starting in the 1870s, which expanded widely by the early twentieth century. Up to 150 species of eucalyptus had been tested by state forestry experiment stations by 1900 in an attempt to find the types that would grow well and serve as timber in California. The trees adapted well to coastal areas of the state and they were planted extensively. While the fast-growing blue gum Eucalyptus continued to be used for windbreaks, by the early twentieth century they

<sup>5</sup> Humboldt County Recorder, Deeds Vol. 123, pages 444-451; Local contracting firm Mercer-Frazer won the 6.2-mile highway contract for the section between Eureka and Arcata. "California Highway Contracts," *Western Highways Builder* 1, No. 2 (February 15, 1919): 26; Sean David Dexter, URS Corporation, Historic photograph in Department of Parks and Recreation Primary Record for "Timber Bridge ruins at Brainard," for the *Positive Archaeological Survey Report, US Highway 101 Eureka-Arcata Corridor Improvement, Arcata to Eureka, Humboldt County, California, District 1*, 2006.

<sup>6</sup> Charles F. Metsker, *Metsker's Humboldt County Atlas, Humboldt County, California* (Portland, OR: Chas. F. Metsker), 1949; Peter Fimrite, "Suit Says Highway 101 Plan Threatens Redwoods," SFGate, June 19, 2010, available at <https://www.sfgate.com/green/article/Suit-says-Highway-101-plan-threatens-redwoods-3185088.php>; Save Richardson Grove, "About: The History of Richardson Grove," Save Richardson Grove, <http://www.saverichardsongrove.org/about/> (accessed February 2018); 1933 dated photograph from personal collection of Barry Douglas at Caltrans District 1, showing the two rows of stumps cut down after the severe frost, California Department of Parks and Recreation, "Richardson Grove State Park," California Department of Parks and Recreation, [https://www.parks.ca.gov/?page\\_id=422](https://www.parks.ca.gov/?page_id=422) (accessed February 2018); Heidi Walters for *North Coast Journal*, "O, Eucalyptus! Should They Stay or Should They Go?"; Dana Bowers, "Frost Bitten Trees Along Roadsides Show Signs of Life," *California Highways and Public Works* (May 1933), 14; US Census, 1920, Population Schedule, California, Humboldt County, Eureka City, Supervisor's District No. 146, Enumeration District No. 187, Sheet 5B; US Census, 1930, Population Schedule, California, Alameda County, Alameda City, Enumeration District No. 1-223, Supervisor's District No. 8, Sheet 11A; *Humboldt Standard*, "Henry M. Devoy, Pioneer Resident of County, Dies," November 21, 1933; Humboldt County Recorder, Deeds Vol. 241, pages 208-209; Humboldt County Recorder, Deeds Vol. 264, pages 255-256; Humboldt County Recorder, Official Records Vol. 2, pages 338-339.

proved not to be a useful source of timber, and in California the lumber harvested from these trees tended to crack, shrink, warp, and rot.<sup>7</sup>

Like other parts of the State, Humboldt County citizen started planning eucalyptus in the 1870s. Local botanist and creator of the Ettersburg Experimental Place, Albert F. Etter, wrote a letter to the editor in *Pacific Rural Press* in 1906 about the history of planting eucalyptus trees in Humboldt County. In it, Etter describes trees that are 25 and 30 years old could be found in many parts of the county. Etter also recounted his personal experience with sprouting, transplanting, growing, and transporting nearly 1500 young eucalyptus trees along the Salt River and Perry Slough near Ferndale in the Eel River Valley. After clearcutting much of the valley, local farmers and dairymen lamented the decreased productivity of their fields. Eucalyptus was chosen to plant in the valley to serve as windbreaks, bank protection, fuel supply, and ornament the landscape. A dense concentration of eucalyptus was planted along the bend in the Salt River that is currently bisected by State Route 211 and follows Port Kenyon Road. Although many of these trees are no longer standing, the remaining trees that were planted in the mid-1890s, still dot the landscape in disrupted rows and can be seen from State Route 211.<sup>8</sup>

#### Evaluation

Although the new information regarding the origin of the planting of the tree row changes the previous context in which the trees were planted, it does not change the previously concurred upon evaluation that the trees are not eligible for listing in the NRHP or CRHR. While the trees have an aesthetic presence along US 101 between Eureka and Arcata, they lack historical significance and historic integrity as established under NRHP and CRHR criteria. Thus, this update evaluation concludes that the previous finding for this resources is still valid.

Under NRHP Criterion A and CRHR Criterion 1, the eucalyptus tree row still is not associated with important events or trends that made a significant contribution to the patterns of history. The trees were planted by a private land owner, not the California Division of Highways as previously reported. Many private land owners planted eucalyptus tree rows as windbreaks throughout California in the late nineteenth century and early twentieth century. There are many examples in coastal areas of the state. For example, large-scale windbreaks were undertaken by the Salinas Land Company and California Orchard Company in the Salinas Valley in Monterey County where over 6,000 eucalyptus trees were planted between 1918 and 1919 along land holdings near US Highway 101 to serve as windbreaks for their agricultural lands.<sup>9</sup> The California Orchard Company grew its own eucalyptus trees in a nursery on the property, with as many as 170,000 in cultivation at any given time. By 1924 nearly 85,000 eucalyptus trees raised by California Orchard Company were planted in long rows on the roughly 8,000 acres of irrigable Salinas Land Company property, spaced at roughly 800-foot intervals along lot lines of the subdivision, and along the western side of the state highway.<sup>10</sup> In comparison to these larger designed landscapes, the tree row recorded here is not significant within the context of privately planted windbreak tree rows. Also, this tree row is not the only, or the oldest tree row in Humboldt County. As discussed above, private citizens began planting eucalyptus trees in Humboldt County in the 1870s and nearly 1500 trees were planted near Ferndale along waterways in the 1890s. The tree row recorded on this form grew back after being cut down in 1933, making the Ferndale tree rows nearly forty-years older, and they are still situated in their agricultural and rural setting.

Under NRHP Criterion B or CRHR Criterion 2, these eucalyptus trees still are not associated with the lives of persons important to history. The trees were planted by private land owner Henry Devoy, not the California Division of Highways as

<sup>7</sup> Robin W. Doughty, *The Eucalyptus: A Natural and Commercial History of the Gum Tree* (Baltimore and London: Johns Hopkins University Press, 2000), 66-67, 71-72, 76-78, 81-82; see also Section 1 of Robert L. Santos, *The Eucalyptus of California: Seeds of Good or Seeds of Evil?* Available at [http://library.csustan.edu/sites/default/files/Bob\\_Santos-The\\_Eucalyptus\\_of\\_California.pdf](http://library.csustan.edu/sites/default/files/Bob_Santos-The_Eucalyptus_of_California.pdf).

<sup>8</sup> Albert F. Etter, "The Eucalyptus in Humboldt County, Cal.," *Pacific Rural Press*, March 10, 1906, 150; Erwin G. Gudde, *California Place Names: The Origin and Etymology of Current Geographical Names*" (Berkeley, CA: University of California Press, 1998), 126; Clyde Sunderland, Flight ID CVL-1954, Frame No. 1N-033, July 21, 1954.

<sup>9</sup> R.E. Hodges, "Large Land Development by Pumps," *Pacific Rural Press*, January 25, 1919, 118.

<sup>10</sup> PAST Consultants, LLC, "Agricultural Resources Evaluation Handbook, Monterey County, California," prepared for Monterey County Parks Department, September 2011, 115; California Orchard Company, "Developing Nineteen Hundred & Five Acres of Fruit and Farm Land in Monterey County, California," 12-13.

previously reported. Devoy was a large, local landholder and rancher, but he does not appear to have made significant contributions to the ranching industry. If Devoy was historically significant, it may also be more appropriate to recognize his house as having more association with his productive life, rather than a tree row that served as a windbreak to one of his leased properties. Furthermore, as discussed above, Devoy is associated with the initial creation of Richard Grove State Park when he donated his 120-acre redwood landholding to the State to use as a park in 1922. Under this association, the State Park would serve better as a representation of his contribution to the State Park system, not the tree row recorded on this form. Criterion B is generally restricted to properties that illustrate, rather than commemorate, a person's important achievements.

Under NRHP Criterion C or CRHR Criterion 3, this update agrees with the previous evaluation that the row of Eucalyptus trees is not associated with the productive careers of significant figures in American landscape architecture as defined by Criterion C, nor is the design plan (a row of trees lining a road) of these trees the first of its type or represent an innovative design plan. Research for this project did not indicate that any significant person in the history of landscape gardening or architecture was involved in the decision to plant the trees. The common nature of tree lined roads does not suggest that planting suggests that it was influential or significant in the theory or practice of landscape architecture. Rural tree-lined roads are common and were often simply the installations of landowners wishing to beautify, provide shade, protect from wind, and/or provide privacy. Additionally, several of the trees have been removed or were cut back by the State Highway Department in 1933 after a severe frost and the integrity of this row (discussed below) has been compromised, eliminating any potential for a historic landscape.

Finally, this resource does not appear to be significant as a source (or likely source) of important information regarding history. The practice of planting of eucalyptus trees as windbreaks is documented in a broad body of contemporary and historical literature. Also, the property's land use and the layout of the tree row, and its relationship the built environment around it, is typical for rural properties of the period and do not appear to provide important information within the broader economic, social, and cultural setting of the region during its historic-period occupation. Therefore, the tree row does not have any likelihood of yielding important information about historic landscape design or planting techniques (NRHP Criterion D or CRHR Criterion 4).

In addition to lacking significance under any of the NRHP or CRHR criteria for evaluation, this resource has lost integrity of setting, feeling, and association. The tree row was planted at some point between 1914 and 1919 by private land owner Henry Devoy to serve as a windbreak for three dairies he owned in the vicinity. Unlike the original pastoral bay setting, the area around the tree row has changed dramatically. The dairy property on the north side of the tree row was transformed into a drying yard and remanufacturing plant as part of the Arcata Redwood Company beginning in the late 1940s. Murray Field Airport, located southwest from the tree row, was initially constructed in the late 1930s, Mid-City Auto World was developed in 1955, the Mid-Way Drive In, now an RV storage facility, was built in 1952, the Cash & Carry was built between 1954 and 1956, a storage facility was built in 1970, and commercial construction along Jacobs Avenue began in the early 1950s and continued into the 1980s (**Plate 2**).<sup>11</sup> Additionally, the highway along which the tree row was planted was expanded from a the original two-lane highway (**Plate 3**) into a major four-lane highway with a large grassy median in the mid-1950s.<sup>12</sup> While the tree row generally retains integrity of location, design, workmanship, and materials, the changes to setting, feeling, and association have substantially diminished the tree row's historic integrity as an agricultural windbreak in a rural setting. The resource does not meet the NRHP or CRHR significance criteria, nor does it retain integrity, and it is not

<sup>11</sup> Judy Tordoff, et al., *Supplemental Historic Resources Evaluation Report, Eureka to Arcata Route 101 Corridor Improvement Project, Humboldt County, California, PM 79.9/86.3 (KP 128.6/138.9), EA 01-363300, 01-366000, July 2006, 7, 10; Times-Standard, "East Ranch North of Eureka Sold to Businessmen, June 29, 1955, 1; Fairchild Aerial Surveys, Flight ID C-19180, Frame 2-6, June 3, 1953; HistoricAerials.com, Eureka, CA, aerial photography [1956]; Clyde Sunderland, Flight ID CVL-1954, Frame No. 12N-137, August 3, 1954; unknown photographer, Flight ID CH-70, Frame No. 17B-77 – Roll 18, August 7, 1970; Cartwright Aerial Surveys, Flight ID CAS-1957, Flight No. Eureka-3, June 6, 1957; CH2M Hill, Flight ID CH2M-1969-HC, Flight No. HC-16-10, August 25, 1969; unknown photographer, Flight ID CDF-ALL-EU, Frame No. 10-16, June 15, 1981.*

<sup>12</sup> Photograph courtesy of Caltrans District 1 Photo Archive; *California Highways and Public Works*, "Burns Memorial Freeway Rededicated," (Sacramento, CA: Division of Highways, November-December 1954), 37.

eligible for listing in the NRHP or CRHR. It also does not appear an eligible for the City of Eureka Local Register of Historic Places,<sup>13</sup> and it is not a historical resource for the purposes of the California Environmental Quality Act (CEQA). This property has been evaluated in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code.

\*B14. Evaluator: Heather Miller

\*Date of Evaluation: February 2018

<sup>13</sup> This property technically falls outside the corporate City limits, but JRP considered it for the Eureka Local Register of Historic Places.  
DPR 523L (1/95) \*Required Information

**Photographs:**



**Photograph 1:** Full length of tree row with est end of west section in foreground, camera facing north, October 25, 2017.



**Photograph 2:** Break in tree rows at former Arcata Redwood Company entrance, camera facing north, October 25, 2017.



**Photograph 3:** West end of east section of tree row, camera facing north, October 25, 2017.



**Plate 1:** 1933 photograph showing two rows of stumps where the trees were cut down after a damaging frost.<sup>14</sup>

<sup>14</sup> Caltrans District 1, HUM-1-H- #16, ID 806, Object File Name img00762, 1933.  
DPR 523L (1/95)





**Plate 2:** 1941 aerial (top) showing dairy just north of tree row (west and east sections bound in red boxes) and pasture land to the south, 2016 aerial (bottom) showing California Redwood Company where dairy used to be, airport, and post WWII commercial development in former open pasture land.



**Plate 3:** 1949 view of west section of tree row. Note the two-lane US 101 Highway.  
Field on right is current location of Mid-City Auto World.<sup>15</sup>

<sup>15</sup> Caltrans District 1, HUM-1-H- #79, ID 4909, Object File Name img04841, 1949  
DPR 523L (1/95)

Previous Historic Resources Inventory

State of California – The Resources Agency DEPARTMENT OF PARKS AND RECREATION <b>PRIMARY RECORD</b>	Primary # _____ HRI # _____ Trinomial _____ NRHP Status Code <u>6</u>
Other Listings _____ Review Code _____	Reviewer _____ Date _____

Page 1 of 5

\*Resource Name or # (Assigned by recorder) Map Reference #14

- P1. Other Identifier:** \_\_\_\_\_
- \*P2. Location:**  Not for Publication  Unrestricted **\*a. County** Humboldt  
 and (P2b and P2c or P2d. Attach a Location Map as necessary.)
- \*b. USGS 7.5' Quad** Eureka **Date** 1959 **T** \_\_\_\_\_; **R** \_\_\_\_\_; \_\_\_\_\_ **of Sec** \_\_\_\_\_; \_\_\_\_\_ **B.M.**
- c. Address** \_\_\_\_\_ **City** Eureka **Zip** \_\_\_\_\_
- d. UTM:** (give more than one for large and/or linear resources) **Zone** 10; 406380mE/ 4518177mN; **Zone** 10; 407050mE/ 45186244mN
- e. Other Locational Data:** (e.g., parcel #, directions to resource, elevation, etc., as appropriate)

**\*P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

These eucalyptus trees are located on the western side of Highway 101, separating the highway from the Northwestern Pacific Railroad tracks, serving as a windbreak and light screen. The trees are spaced approximately five feet apart in a single row lining the highway. They are approximately 30 feet tall and extend from Fay Slough near the Eureka Airport to just southwest of the Indianola Cutoff, a distance of approximately one and half miles.

**\*P3b. Resource Attributes:** (List attributes and codes) (HP 30) Trees/Vegetation

**\*P4. Resources Present:**  Building  Structure  Object  Site  District  Element of District  Other (Isolates, etc.)

**PSa. Photo of Drawing** (Photo required for buildings, structures, and objects.)

See continuation sheet.

**PSb. Description of Photo:** (View, date, accession #) See continuation sheet.

**\*P6. Date Constructed/Age and Sources:**  
 Historic  Prehistoric  Both  
Planted in circa early 1920s.

**\*P7. Owner and Address:**  
Unknown

**\*P8. Recorded by:** (Name, affiliation, address)  
Amanda Blosser & Courtney Chambers  
JRP Historical Consulting Services  
1490 Drew Ave, Suite 110  
Davis, CA 95616

**\*P9. Date Recorded:** February 18, 2003

**\*P10. Survey Type:** (Describe)  
Intensive

**\*P11. Report Citation:** (Cite survey report and other sources, or enter "none.") JRP Historical Consulting Services, HRER Route 101 Eureka-Arcata Corridor Highway Improvement Project, October 2003.

- \*Attachments:** NONE  Location Map  Sketch Map  Continuation Sheet  Building, Structure, and Object Record  Archaeological Record  
 District Record  Linear Feature Record  Milling Station Record  Rock Art Record  Artifact Record  Photograph Record  
 Other (list) \_\_\_\_\_  
 DPR 523A (1/95)

\*Required Information

State of California – The Resources Agency  
 DEPARTMENT OF PARKS AND RECREATION  
**BUILDING, STRUCTURE, AND OBJECT RECORD**

Primary # \_\_\_\_\_  
 HRI # \_\_\_\_\_

Page 2 of 5

\*NRHP Status Code 6

\*Resource Name or # (Assigned by recorder) Map Reference #14

B1. Historic Name: \_\_\_\_\_  
 B2. Common Name: \_\_\_\_\_  
 B3. Original Use: \_\_\_\_\_ B4. Present Use: \_\_\_\_\_

\*B5. Architectural Style: \_\_\_\_\_

\*B6. Construction History: (Construction date, alteration, and date of alterations) Trees planted in circa mid-1920s

\*B7. Moved?  No  Yes  Unknown Date: n/a Original Location: n/a

\*B8. Related Features: none

B9. Architect: none b. Builder: none

\*B10. Significance: Theme n/a Area n/a

Period of Significance n/a Property Type n/a Applicable Criteria n/a

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

These eucalyptus trees do not appear to meet the criteria for listing in the National Register of Historic Places, nor do they appear to be a historical resource for the purposes of CEQA. Although the date they were planted is unknown, the trees were most likely planted between 1919 and 1925 when the highway along the bay between Arcata and Eureka was built. The reclaimed tidal marsh along Humboldt Bay was sparsely settled prior to the improvements of Highway 101 and consisted mainly of two small settlements, Brainard and Bayside, located north of the current Jacobs Avenue near the old state highway. State Highway 101 was laid out in 1919 along the western edge of Humboldt Bay to serve as a connector between Eureka and Arcata and became a major artery with the volume of traffic steadily increasing into the 1940s. Road improvements along this five-mile stretch of road became a necessity with the increasing traffic volume and in 1944 this section of Highway 101 was placed on the planning program as high-priority. When funds became available in 1954, construction started on the improvements on the five-mile section between Eureka and Gannon Sloughs. The improvements consisted of reconstruction of the old two-lane road, addition of two more lanes creating a four lane limited access route with channelized intersections at two county roads. (See continuation sheet).

B11. Additional Resource Attributes: (List attributes and codes) none

\*B12. References: Sanborn Fire Insurance Maps, "Eureka," 1956; City Directories (various years); Building Permits, Eureka Building Department; USGS Quadrangles *Eureka and Arcata South* (1959, 1972); "East Highway Subdivision Map," Humboldt County Records Office; Caltrans As-Built for Highway 101; Caltrans "General Guidelines for Identifying and Evaluating Historic Landscapes," February 1999.

B13. Remarks:

\*B14. Evaluator: Amanda Blosser

\*Date of Evaluation: March 6, 2003

(This space reserved for official comments.)

(Sketch Map with north arrow required.)

See Location Map

**B10. Significance (continued):**

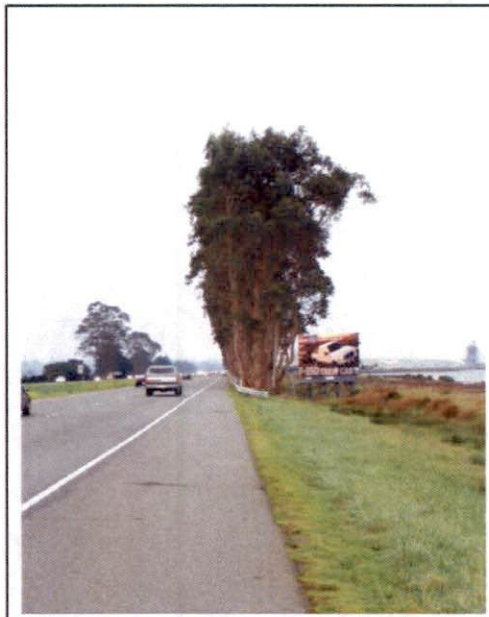
Jacobs Avenue was also laid out and constructed at this time to accommodate traffic needs and with this improvements, the drainage system became a necessity for carrying water to the Bay. Improvements were completed in the summer of 1955 relieving traffic congestion between the two cities and accommodating local traffic needs, as in the case of this system. The highway also provided improved access for two county roads serving the Humboldt County Airport and the small developing industrial area along the East Highway subdivision.

These eucalyptus trees were most likely planted between 1919 and 1925, as part of construction for the new highway connecting Eureka and Arcata. Although the Division of Highways had to cut the trees to the ground in 1933 after a severe frost, the trees continued to grow alongside the highway. In 1920, the California Division of Highways established a state nursery that enabled the division to plant thousands of trees each year for roadside landscaping. The Division of Highways also employed an arboriculturist to supervise the planting and the care of trees along state highways as early as 1920. Additionally, in the 1920s and 1930s, private groups seeking to enhance roadside beautification planted approximately 130,000 trees along California state highways. After assuming the cost of planting and care of the trees for the first year, the Division of Highways assumed control of the trees. These private groups worked in conjunction with the state arboriculturist, who recommended coast redwood, sycamores, eucalyptus, coast live oak, and silver maple trees for use in the coastal areas of California. Eucalyptus trees were commonly planted as windbreaks along California highways during the 1920s, 1930s, 1940s, and 1950s. In 1948, a row of eucalyptus trees, along a state highway in San Bernardino County were planted specifically to shield drivers from the train headlights on the parallel train tracks. The row of eucalyptus trees lining Highway 101 in Humboldt County may have been planted for the same purposes.<sup>1</sup>

Under Criterion A, these eucalyptus trees do not appear to be importantly associated with significant events or trends in state or national history. Although part of a state-wide effort of roadside beautification, this row of Eucalyptus trees does not appear to be significant within this context. Examples of similar tree-lined highways exist in many towns and areas, including a walnut tree-lined boulevard in Davis, California, and another in rural Yolo County south of West Sacramento; palm tree-lined rural roads in Kern County; olive tree-lined rural routes throughout the Central Valley; or other eucalyptus-lined stretches of state highways. This row of trees also do not appear to be importantly associated with any individuals who made significant contributions to the history at the local, state, or national level under Criterion B. Research for this project did not indicate that these trees were associated with any historical significant persons. Under Criterion C, the row of Eucalyptus trees are not associated with the productive careers of significant figures in American landscape architecture as defined by Criterion C, nor is the design plan (a row of trees lining a road) of these trees the first of its type or represent an innovative design plan. Research for this project did not indicate that any significant person in the history of landscape gardening or architecture was involved in the decision to plant the trees; in fact, the historic record does not indicate whose decision it was to plant them. The common nature of tree lined roads does not suggest that planting suggests that it was influential or significant in the theory or practice of landscape architecture. Rural tree-lined roads are common, and were often simply the installations of landowners wishing to beautify, provide shade, protect from wind, provide privacy. Additionally, several of the trees have been removed or were cut back by the State Highway Department in 1933 after a severe frost and the integrity of this row has been compromised, eliminating any potential for a historic landscape. In rare instances, resources themselves can serve as sources of important information about historic construction materials or technologies (Criterion D); however, this property is otherwise documented and does not appear to be a principal source of important information in this regard. This property has been evaluated in accordance with Section 15064.5(1)(2)-(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code. The property does not appear to meet the criteria for listing in California Register of Historic Resources.

<sup>1</sup> L.R. McNeely, "Plantings: Eucalyptus Trees Used for Windbreaks on Freeway," *California Highways and Public Works* (Sacramento: California Department of Transportation, September-October, 1948), 36; "How State Cares for 130,000 Trees Privately Planted Along Highways," *California Highways and Public Works* (Sacramento: California Department of Transportation, December 1931), 34; and "Tree Maintenance," *California Highways and Public Works* (Sacramento: California Department of Transportation, March 1924), 6.  
DPR 523L (1/95) \*Required Information

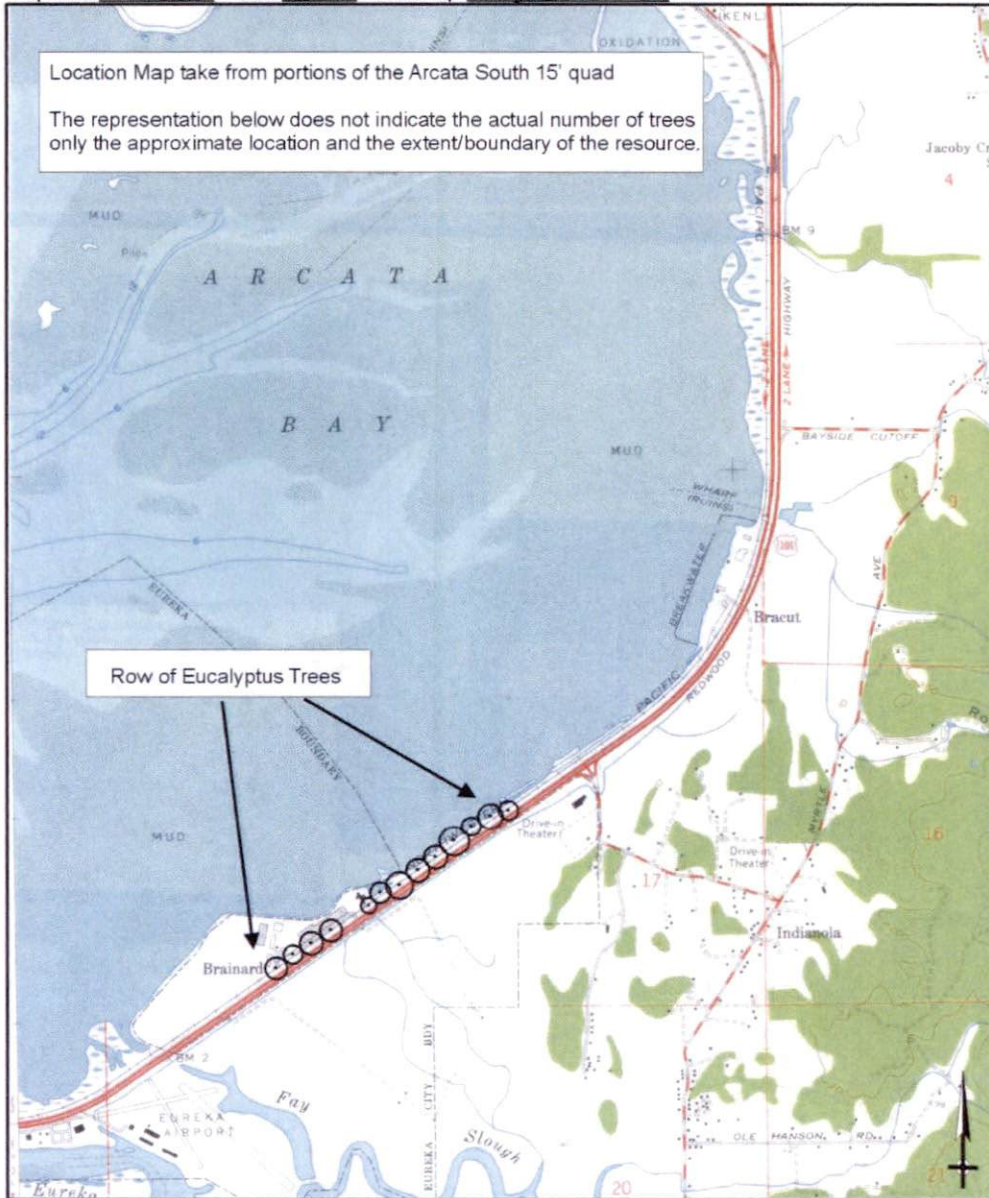
**Photographs (cont):**



Photograph 1. View of eucalyptus trees, camera facing southwest, February 18, 2003.

Location Map take from portions of the Arcata South 15' quad

The representation below does not indicate the actual number of trees  
only the approximate location and the extent/boundary of the resource.



DPR 523L (1/95)

\*Required Information

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

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June 19, 2018

VIA EMAIL

In reply refer to: FHWA\_2018\_0409\_001

Mr. Brandon Larsen, Senior Environmental Planner  
Office of Local Assistance  
Caltrans District 1  
PO Box 3700  
Eureka, CA 95502-3700

Subject: Determinations of Eligibility for the Humboldt Bay Trail South Project,  
Humboldt County, CA

Dear Mr. Larsen:

Caltrans is initiating consultation for the subject undertaking in accordance with the January 1, 2014 *First Amended Programmatic Agreement 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* (PA). Caltrans is concurrently complying with PRC 5024 pursuant to Stipulation III of the *Memorandum of Understanding between the California Department of Transportation and the California Historic Preservation Officer regarding Compliance with Public Resources Code Section 5024 and Governor's Executive Order W-26-92* (PRC 5024 MOU). As part of your documentation, Caltrans submitted Historic Property Survey Report (HPSR), Historical Resource Evaluation Report (HRER), and an Archaeological Survey Report (ASR) for the project.

The County of Humboldt, in cooperation with Caltrans, is proposing to develop 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. A depiction of the area of potential effect (APE) for the project is located in Attachment A of the HPSR and a brief project description is located on page 1.

Caltrans is requesting concurrence that the Former Arcata Redwood Company and the Northwestern Pacific Railroad from Bucksport through Arcata are not eligible individually, or as part of a historic district, for either the National Register of Historic Places or the California Register of Historic Resources. Based on my review of the submitted documentation, I concur.



Mr. Larsen  
June 19, 2018  
Page 2 of 2

FHWA\_2018\_0409\_001

If you have any questions, please contact Natalie Lindquist of my staff at (916) 445-7014 with e-mail at [natalie.lindquist@parks.ca.gov](mailto:natalie.lindquist@parks.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to be 'J Polanco', with a long horizontal line extending to the right.

Julianne Polanco  
State Historic Preservation Officer

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

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November 29, 2006

Reply To: FHWA061012A

Rod Parsons, Chief  
North Region Environmental Management Branch E1  
Department of Transportation  
District 1  
PO Box 3700  
Eureka, CA 95502-3700

Re: Determinations of Eligibility for the Proposed Eureka-Arcata Corridor Projects in Humboldt County, CA

Dear Mr. Parsons:

Thank you for consulting with me about the subject undertaking in accordance with the *Programmatic Agreement 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 (PA)*.

Caltrans is requesting my concurrence, pursuant to Stipulation VIII.C.5 of the PA, in its determination that the following properties are not eligible for the National Register of Historic Places (NRHP):

- 2846 Jacobs Avenue
- 3008 Jacobs Avenue
- 3130 Jacobs Avenue
- 3134 Jacobs Avenue
- 3346 & 3348 Jacobs Avenue
- 3324 & 3360 Jacobs Avenue
- 3408 Jacobs Avenue
- 3428 Jacobs Avenue
- 3824 Jacobs Avenue
- 3956 Jacobs Avenue
- 6700 N Highway 101
- 4056 N Highway 101
- Tidegates and ditch
- Eucalyptus Trees
- Portions of Flanigan, Brosnan & Company Railroad
- Portions of Freshwater Railroad
- Portions of the Northwestern Pacific Railroad

Mr. Parsons  
November 29, 2006  
Page 2 of 2

**I concur.**

I am presently unable to concur that a portion of the Murray Field Airport, a former World War II Naval Air Station in the undertaking's APE, is eligible for inclusion in the NRHP under criterion C at a local level of significance. I currently do not have sufficient contextual information to make an eligibility determination for this property. I would prefer to suspend consideration of the subject property's NRHP eligibility until such time as a more complete context for the history of the airport and air hangars, as a whole, becomes available. For the purpose of our present consultation, I recommend, in the absence of the availability of such a context, that the FHWA assume the National Register eligibility of the Murray Field Airport.

A portion of the Batini Dump, a refuse dump that dates to the 1930s, is located within the area of direct impact (ADI) for the project. This portion was evaluated as not eligible for the NRHP. The remaining known portion of the dump is located to the east on private property outside of the ADI. Pursuant to Stipulation VIII.C.3. of the PA, Caltrans is considering this portion of the Batini Dump eligible for the NRHP under criterion D for the purposes of the present undertaking without conducting further subsurface testing or surface collection. An environmentally sensitive area will be established and enforced to ensure that there will be no adverse effects to this property as a result of the proposed undertaking pursuant to Stipulation X.B.2.a(ii). **I concur.**

Thank you for considering historic properties as part of your project planning. If you have any questions, please contact Natalie Lindquist of my staff at your earliest convenience at (916) 654-0631 or e-mail at [nlindquist@parks.ca.gov](mailto:nlindquist@parks.ca.gov).

Sincerely,

*Susan K Stratton for*

Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer