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**Cc:** [Planning Clerk](#)  
**Subject:** Deny Approval of a Coastal Development Permit due to significant cultural resources at Bayside Corners  
**Date:** Wednesday, May 04, 2022 6:53:30 PM

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5/4/2022

Humboldt County Planning Commission  
3015 H St.  
Eureka, CA 95501

Re: Old Arcata Road Rehabilitation and Pedestrian/Bikeway Improvements Coastal Development Permit; Bayside Area; Record Number PLN-2022-1764

Dear Members of the Humboldt County Planning Commission,

The County should not grant the coastal development permit because the project *violates the County's local coastal plan*, specifically, the project violates sections 3.18 and 3.29 of the Plan.

These sections require, where new development will adversely affect archaeological or paleontological resources identified by the State Historic Preservation Officer, reasonable mitigation measures should be required. To date there are no mitigations proposed to protect known cultural resources in the project area (APE) which violates the Coastal Plan.

Of particular concern is the very culturally sensitive area at the juncture of Old Arcata Road and Jacoby Creek Road known as Bayside Corners. This area was a major ethnographic Wiyot village site and includes numerous historic properties listed and eligible for listing on the National Register of Historic Places according to the State Historic Preservation Office. In addition to the archaeological site, the historic resources include the:

1903 Jacoby Creek School  
1882 Temperance Hall  
1941 Grange/Bayside Community Hall  
1876 Lawlor-Connor-Wilson House  
1887 Charles Monahan-Dexter House/Old Post Office

There are also approximately 34 additional properties that have been identified by qualified historians as eligible for National Register listing in Bayside.

The identified cultural resources in this area contribute to the better understanding of our past, both prehistorically and during the Euro-American occupation of the project area which has a period of significance from about 1870 - 1970. The massive ethnographic village site at Bayside Corners has several historic resources overlaying the previous prehistoric occupation of the area. All the historic resources, except the Old Post Office, are listed and determined eligible for the National Register and cannot be separated as significant cultural resources from one another or from the prehistoric site they share. They both exist in situ and are only separated by time (millennia) and cultural association. They are all recognized as significant and worthy of preservation and protection.

The historic setting and the view sheds associated with the buildings and archaeological deposits at Bayside Corners should not be disturbed by an intrusive Roundabout that will move the existing Old Arcata Road approximately 66 feet closer to the Temperance Hall which is used as an elementary school. This proposed development will adversely impact the view sheds and setting for these National Register listed and eligible properties.

There are also many other deleterious and adverse effects that the proposed Roundabout would bring to Bayside Corners. Specifically,

The proposed Roundabout will adversely affect the cultural landscape at Bayside Corners by degrading its rural residential setting which supports the historic context of the properties and the National Register significance of the cultural resources located in the immediate vicinity.

The Roundabout will displace the original part of Old Arcata Road in front of the Temperance Hall and the now historic portion of the Old Arcata Road that was created in 1946, by the County. The roadway itself is a critical landscape feature to this historic setting per the Secretary of the Interior's Standards.

The Roundabout will eliminate important Open Space in front of the 1882 Temperance Hall which the County owns and is used extensively by the community. This Open Space is the subject of an Encroachment Permit to be given to the City of Arcata for the Roundabout. If the County allows a Roundabout on their property, they will contribute to the degradation of the historic area and setting, by bringing the road and the Roundabout to within 35 feet of the front facade of the Temperance Hall which is used as an elementary school and closer to the old Jacoby Creek School landmark.

There is also a high probability that the deep digging required to construct the Roundabout and install electrical service and drainage culverts could expose archaeological remains and halt the project and possibly require a new plan to avoid burials and sensitive cultural information.

Any adverse development such as a massive Roundabout which is proposed for this intersection that is on or in the immediate proximity of these cultural resources must be mitigated and there is no acknowledgement of these adverse effects nor proposed mitigation for these cultural resources that are inextricably linked to the prehistoric and historic occupation of the area.

In my professional opinion, Bayside Corners is eligible as an historic district to the National Register for its contribution to the prehistoric and historic settlement of Bayside. Archaeologist Katherine Flynn back in 1977 discussed the eligibility of the cultural resources found at Bayside Corners for National Register District designation and Historian, Susie Van Kirk, in 1974 also acknowledged that the Old Arcata Road from Eureka to Arcata and its associated historic resources were eligible as an historic district.

The City of Arcata and Cal Trans have been negligent in their duty to adequately identify and protect significant cultural resources in the project area. They have severely restricted the potential for adverse effects to historic properties by not including the entire parcel for each property adjacent to the road to be sufficiently analyzed and thereby purposely limiting the identification of historic resources. By gerrymandering the APE, they have curtailed sufficient resource identification and impact analysis to protect the historic and rural residential character of Bayside.

The proposed project Alternative as described in the EIR would avoid any adverse effects to cultural resources by keeping the road in its current location and making modest modifications to support a safer intersection for bicyclists and pedestrians which is the ultimate goal of the road project.

On the basis of this information and the previously recorded objections to the EIR, I recommend that the Planning Commission deny approval of a Coastal Development Permit for this Project.

Thank you,

Kathleen Stanton, M.A.  
Historic Resources Consultant for Bayside Cares & Bayside Resident