



January 30, 2009

Sidnie L. Olson, AICP, Principal Planner
City of Eureka
Community Development Department
531 "K" Street
Eureka, CA 95501

RE: Marina Center Mixed Use Development Project
Draft Environmental Impact Report

Dear Ms. Olson:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Marina Center Mixed Use Development Project. The Eureka Heritage Society wishes to dispute the DEIR's conclusion in section IV.E that the site is not considered historically significant for the purposes of the National Historic Preservation Act (NHPA) and the California Environmental Quality Act (CEQA.)

It should be stated that the proposed site qualifies as a historic resource under as defined by NHPA and CEQA because of its historic significance to the City of Eureka. On page IV.E-11, the eligibility criteria for NHPA and CEQA state "...are associated with events that have made a significant contribution to the broad patterns of our history." Few events surpass the railroad as an event that contributed to the broad pattern of our history, both locally and nationally. The railroad was an indisputably important component in the development of Eureka and Humboldt Bay.

While the DEIR addresses each of the resources; structures, foundations and other rail-related features, and the turntable separately, it does not address the impact of the project on the resources as a whole. The DEIR states that none of the resources are *separately* considered historic; however, together the remaining resources do tell the story of the railroad within the City of Eureka and its importance on Humboldt Bay. The DEIR must make a convincing case that the resources *together* do not meet the NHPA and CEQA guidelines.

In addition, on page IV.E-9, the figure shows the project overlaid on the 1946 aerial photo of the project site. In reviewing this photo/overlay, the project is adjacent to the building located at 502 Broadway, the building that currently houses the Nilsen Company. This building is predates 1958 and the impact of the project on it must be addressed in DEIR.

Sincerely,

Mary Ann McCulloch
Chair, Preservation Committee