

Beverly Bastian - RE: Humboldt Bay Power Plant Historic District review

From: "Byrd, David" <dbyrd@parks.ca.gov>
To: "Beverly Bastian" <Bbastian@energy.state.ca.us>
Date: 12/12/2007 3:06 PM
Subject: RE: Humboldt Bay Power Plant Historic District review

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Hi Beverly,

Here are a few comments, if they seem scattered, I apologize; I wanted to get them to you as soon as possible in case you wanted to discuss. My direct line is below, and I will be in the office until 4p.m. today, and should be available any time between 7:30a.m. and 4p.m. tomorrow and Friday.

Let me first explain my approach in this review. First, I read over the consultant's memo and their DPR 523 form. After considering their argument, I read through the salient portions (historic background and evaluation) of your report. In general, I do not believe that the consultant thoughtfully and thoroughly applied the National Register criteria for evaluation. In particular, I do not believe that the consultant adequately evaluated the property within its historic context. In considering the significance of the plant under Criterion A, the consultant asserts that there are no known significant events with which the plant is associated. The historic context however, fails to include some very fundamental information necessary to adequately evaluate the property under this Criterion. For example, the context explains that the plant was built to serve the increasing demand for power in the region, but does not mention why there was a demand. Moreover, the evaluation fails to account for whether the plant actually contributed or not to the development of region. I believe that the memo also does not adequately discuss the history of the development of commercial electrical power plants in California and the nation -- perhaps the most important context needed to understand the subject property -- or how the plant fits within that context, except in a very general way. A similar comment could be made regarding the evaluation under Criterion B. I would point out that the "References" section of the memo does not include any source (local histories and so forth) that would provide evidence of the relative importance or non-importance of events and individuals associated with the property. I am also confused about the application of Criterion C. As I understand the property from the information provided, it appears that the plant does embody the characteristics of a type: commercial electrical power plants. The analysis of the importance of the type is cursory and appears to be based largely upon supposition ("it seems likely that it was designed similarly in both plan and construction to preexisting and later power plants...") and not hard data. Consequently, I believe that if this memo was received for review in the Office of Historic Preservation, the SHPO would not be able to concur with the conclusion on not eligibility based on the information provided and would request additional documentation.

In contrast, I found the historic context in the CEC report to have much of the contextual information necessary for evaluating the property. I also found that your arguments for significance as outlined in the summary to be thoughtful and reasonable. After reviewing the documentation, I believe if presented for formal review it is likely that SHPO could agree with your eligibility determination. Under your argument for significance under Criterion C, I don't believe that you need to typify the property as "typical and common"; as I mentioned the plant appears to embody the characteristics of a type. I am also curious as to how many buildings would be within the boundary of the historic district, aside from the Unit 1, Unit 2, and Unit 3? If you are proposing a historic district, you need to clearly delineate a rationale boundary -- which in this case appears to be everything within the fenced area -- and characterize those buildings and structures within that boundary that contribute to the significance of the district and those which do not contribute. Are there any buildings that do not contribute. If so they need to be accounted for and the number of contributors should be considerably more than the non-contributors.

Finally, with regard to the mitigation measures, I believe what you have proposed is appropriate.

I hope this helps, please feel free to call if you want to discuss.

David S. Byrd
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From: Beverly Bastian [mailto:Bbastian@energy.state.ca.us]
Sent: Tuesday, December 11, 2007 8:02 AM
To: Byrd, David
Subject: RE: Humboldt Bay Power Plant Historic District review

Hi Dave,

Thanks for getting in touch and for offering to try to provide me with your comments before my meeting on the 14th. After being out of town, you have many other things you want to catch up with, I am sure, so your offer to even try for the 14th is most gracious. I really owe you one.

If you could possibly email me something on the 13th, that would be best for me. I can check my work email from home and receive anything sent up to 5:30 a.m. on the 13th. At that point I have to leave for the airport--the meeting is in Eureka, and I have an early flight.

The consultant's memo is not very long, but my document is lengthy. To somewhat assist you in being efficient, the parts of it you would want to focus on, I think, are pp. 9-12 (historical background) and pp. 15-22 (argument for a significant historic district). Again, the consultant's DPR 523 District form is viewable on pp. 49-71 in the .pdf file on this website:

http://www.energy.ca.gov/sitingcases/humboldt/documents/applicant/DATA_RESPONSE/2007-01-17_INTRO.PDF

If you do not find my argument persuasive, I would appreciate your telling me why it is weak. I am now too close to this argument to see where the holes are, and my colleagues here are not well versed in the subtleties of significance calls, so your independent appraisal will be very valuable.

Thanks again. I will be out of the office between 10:00 and 12:00, but if I can assist in any way, please email or call 654-4840.

Bev

>>> "Byrd, David" <dbyrd@parks.ca.gov> 12/11/2007 7:47 AM >>>

Hi,

I just got back into the office today (12/11) so apologies for not responding sooner. You mention there is a meeting on the 14th? what's the latest that I can get my comments back to you where they would still be useful? Would the afternoon of the 13th work? Or perhaps early a.m. on the 14th?

Best,

Dave

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From: Beverly Bastian [mailto:Bbastian@energy.state.ca.us]
Sent: Thursday, December 06, 2007 11:52 AM
To: Byrd, David
Cc: Dorothy Torres; John Kessler; Michael McGuirt; Rick York; Stratton, Susan
Subject: Humboldt Bay Power Plant Historic District review

Hi Dave,

My new colleague here at the Energy Commission, Mike McGuirt, spoke with your supervisor, Susan Stratton, yesterday, and got her OK for you to review a CEQA document I wrote for a re-powering project at the Humboldt Bay Power Plant.

The part of the attached document for which I would appreciate your particular attention is my disagreement with the project proponent's consultant's recommendation that a historic district, consisting of the old power plant, is not significant under NRHP criteria. I argue that it is a significant historic district under NRHP criteria and that the proposed project's indirect impact--the demolition of the old plant--is significant and must be mitigated.

Your review should include an independent assessment of the issue of the significance of the Humboldt Bay Power Plant Historic District, to the extent you can render that from my document and from the proponent's consultant's evaluation, which I have also attached. I do not have the consultant's DPR 523 District form as a WORD file, but you can view it as pp. 49-71 in the .pdf file on this website:

http://www.energy.ca.gov/sitingcases/humboldt/documents/applicant/DATA_RESPONSE/2007-01-17_INTRO.PDF

Additionally, please point out to me any weaknesses in my analysis and discussion, and suggest what I can do to strengthen my argument.

And if you have suggestions for any refinements to my recommended mitigation, they would be most welcome.

The Energy Commission has scheduled a meeting for 12/14 to discuss this and other environmental issues with the project proponent, so if there is any way I could have your review before then, I would greatly appreciate it. I realize this is asking a lot, and I mention the date only with the faint hope that it might be feasible for you to do this in that time frame. But I am holding no unreasonable expectations.

Thanks very much for your help with this, and I hope I will have an opportunity to re-pay the favor some time.

Beverly

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