

Yreka Carnegie Library Rehabilitation Project Finding of No Adverse Effect



Prepared For:
Siskiyou Economic
Development Council
1512 S. Oregon Street
Yreka, CA 96097

Prepared by:
GPA Consulting
617 S. Olive Street
Suite 910
Los Angeles, CA
90014



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EXECUTIVE SUMMARY

The Historic Carnegie Library Building is located at 412 W. Miner Street in the city of Yreka, California. The one- and one-half story building was constructed in 1915 and is owned by the City of Yreka (City). It was individually listed in the National Register of Historic Places (NRHP #92000270) in 1992 as part of the California Carnegie Libraries Multiple Property Listing (MPL).

The City, in cooperation with the Siskiyou County Economic Development Council (SCEDC), proposes to rehabilitate and adaptively reuse the building and create new workspaces and a conference venue (Project), to serve as a catalyst for community investment. The City and SCEDC were awarded a Community Development Block Grant (CDBG) from the California Department of Housing and Community Development (HCD) to fund the Project. As the Project will utilize federal funding through the HCD on behalf of the Housing and Urban Development (HUD), documentation pursuant to the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). The City and the SCEDC also have responsibilities pursuant to the California Environmental Quality Act (CEQA). As the applicant and grant recipient and in accordance with 36 CFR 800.2a(3) and 36 CFR 800.3b, the SCEDC has prepared this document as delegated by the HCD for compliance with NEPA and Section 106 Compliance. The City of Yreka is the lead agency for CEQA Compliance and will use this report for their CEQA documentation as it pertains to the historic built environment.

This Finding of No Adverse Effect (FNAE) was prepared by GPA Consulting on behalf of the City and the SCEDC in support of their environmental review for the Project. Specifically, this technical report discusses the Project's compliance with Section 106 and CEQA as it pertains to built environment resources. The Yreka Carnegie Library was identified as a "historic property" for the purpose of Section 106 and a "historical resource" for the purpose of CEQA because the building is listed on the NRHP. The rehabilitation of the building has the potential to affect the historic property, however because the Project will comply with the Secretary of the Interior's Standards (SOIS) for Rehabilitation, it was determined that the undertaking would not cause an adverse effect on the historic property as defined by Section 106 and would not cause a substantial adverse change on the significance of the historical resource as defined by CEQA. Therefore, the Project would result in a Finding of No Adverse Effect for Section 106 compliance, and no mitigation would be required. As the Project would have a less-than-significant impact on the historical resource, no mitigation is required or recommended for the purposes of CEQA compliance.

1. INTRODUCTION

1.1 Project Location and Setting

The Yreka Carnegie Library is located at 412 W. Miner Street, mid-block between Pine and S. Oregon Streets in downtown Yreka. The city of Yreka is located in Siskiyou County in Northern California, roughly twenty miles south of the Oregon border (see Appendix A, Project Location and Vicinity Maps). The city is modest in size and located in a rural part of northern California surrounded by farms, forests, and mountains. The building is located within the city's historic downtown core. The immediate area is surrounded by commercial buildings from the late 1880s to the 1920s which a part of the West Miner Historic District. The library building itself is located directly outside the boundaries of the district. The building is slightly set back from the street and has manicured grass and a concrete walkway leading from the sidewalk and surface parking in the rear. Most of the commercial buildings in the downtown area are one to two stories in height and are built to the lot line facing the sidewalk and street; some of the buildings have covered walkways. Parking in the commercial areas include parallel street parking or city-owned surface parking lots. There are very few trees aligning the street in the immediate vicinity.

The city of Yreka was incorporated in 1857.¹ The area quickly attracted miners due to the discovery of gold in the Black Gulch along the Siskiyou Trail. This discovery resulted in the northern expansion of the California Gold Rush causing a rapid increase to the population.² Since incorporation, the residents of Yreka took an interest in establishing a local library. The first organized effort for a public library was in 1910, with the assistance of the Yreka Improvement Club, an organization comprised of local residents.³ Through their efforts, they established the Yreka Improvement Club Library which later evolved and developed into the Yreka Public Library. The location of this library was inadequate, so the Yreka Improvement Club raised funds to purchase the parcel and requested funding from Andrew Carnegie to construct a proper library in Yreka.⁴

The Historic Carnegie Library is a one-story concrete masonry building that was constructed in the Classical Revival style in 1915 (See **Figure 1**), with a two-story (non-contributing) addition constructed at the rear in 1980 (See **Figure 2**). The building is individually listed in the National Register of Historic Places as part of the Multiple Property Listing for California Carnegie Libraries. For a full context of the building and identification of significant character-defining-features, refer to the Historic Structures Report (HSR) in Appendix D.



Figure 1: Primary elevation, view facing north. GPA 2022.



Figure 2: West elevation, view facing southeast. GPA 2022.

¹ "History of Yreka," History of Yreka, accessed November 23, 2022, <https://ci.yreka.ca.us/302/History-of-Yreka>.

² Ibid.

³ "Carnegie Library is Completed and Accepted by City" *Siskiyou Daily News*, August 19, 1915.

⁴ Steade Craigo, "National Register of Historic Places Nomination: Yreka Carnegie Library, Yreka," 1992.

1.2 Project Description

The City and the SCEDC propose to rehabilitate the interior and exterior of the Historic Carnegie Library. The exterior will be repaired and preserved while the interior will be rehabilitated to accommodate a new use and to bring the building up to modern design and safety codes utilizing the Historic Building Code (HBC), Chapter 8 of the California's Uniform Building Code (CUBC) (see Appendix C).

Exterior Rehabilitation

The scope of the proposed exterior rehabilitation of the Yreka Carnegie Library would include removing and replacing all non-original windows and doors on the (non-original) 1980s rear addition in new openings and constructing a new exterior balcony and patio on the north (rear) elevation (see Figure 3).

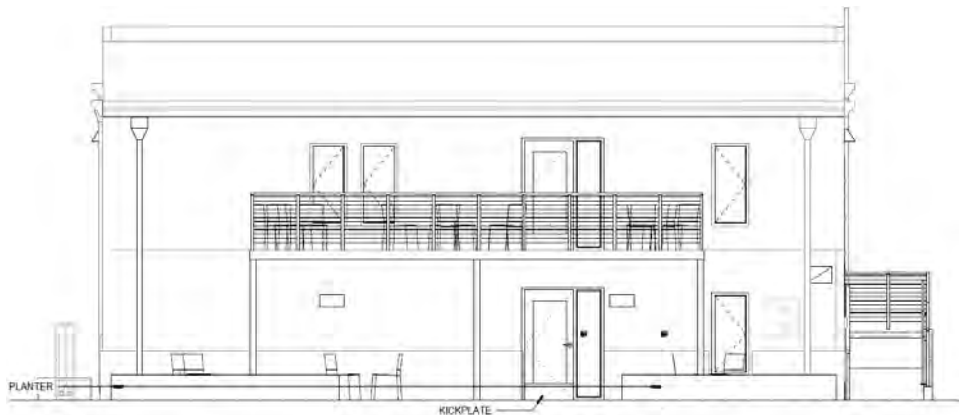


Figure 3: North (rear) elevation. Plans courtesy of ORW Architecture. November 2022.

A new ADA-compliant ramp would be constructed along the west (side) elevation to accommodate a new accessible entrance to the main lobby area. To create the new ADA-compliant entrance on the west elevation, an original window opening on the west elevation would be reconfigured to fit a new door that would be accessed by the proposed ramp. In order to construct the new APA-compliant ramp, the existing basement-level door opening and two windows on the west elevation would be infilled as well as the exterior stairwell (see Figure 4).

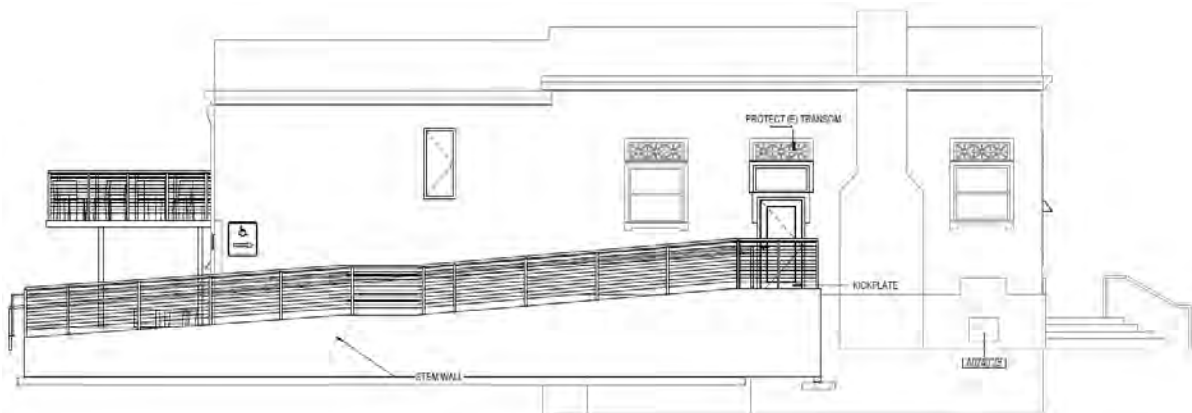


Figure 4: West (side) elevation. Plans courtesy of ORW Architecture. November 2022.

In addition to the proposed rehabilitation plans, general building maintenance and repairs would occur on all elevations. This would include the following:

- Repair and repaint original cement plaster (south, east, and west elevations).
- Repair and restore original decorative cornice around roof (south, west, and east elevations).
- Repair parapet (all elevations).
- Repair and repaint window and door trim (south, east, and west elevations).
- Repair and repaint existing window sashes according to NPS Technical Brief #9 – The Repair of Historic Wooden Windows (south, east, and west elevations).
- Repair damaged, cracked, or broken glazing according to NPS Technical Brief #9 – The Repair of Historic Wooden Windows (all elevations).

Interior Rehabilitation and Renovation

The scope of the proposed interior rehabilitation includes rehabilitating office spaces on the main floor of the original building and creating an open-plan work area and conference venue within the rear addition.

The rehabilitation of the main floor of the original building would include lead and asbestos abatement, upgrades to the existing restrooms, removal of the non-original partition walls forming the former Police Station Lobby and removal of the non-original office south of the fireplace. Other existing spaces would be converted to new office uses. Non-original features like florescent lighting, drop ceilings, and carpeting would be removed and replaced with more historically compatible replacements or restored based on documentary evidence, if feasible. Original features like the wood trim and wood wall paneling and shelving would be retained and repaired as needed (see Figure 5).

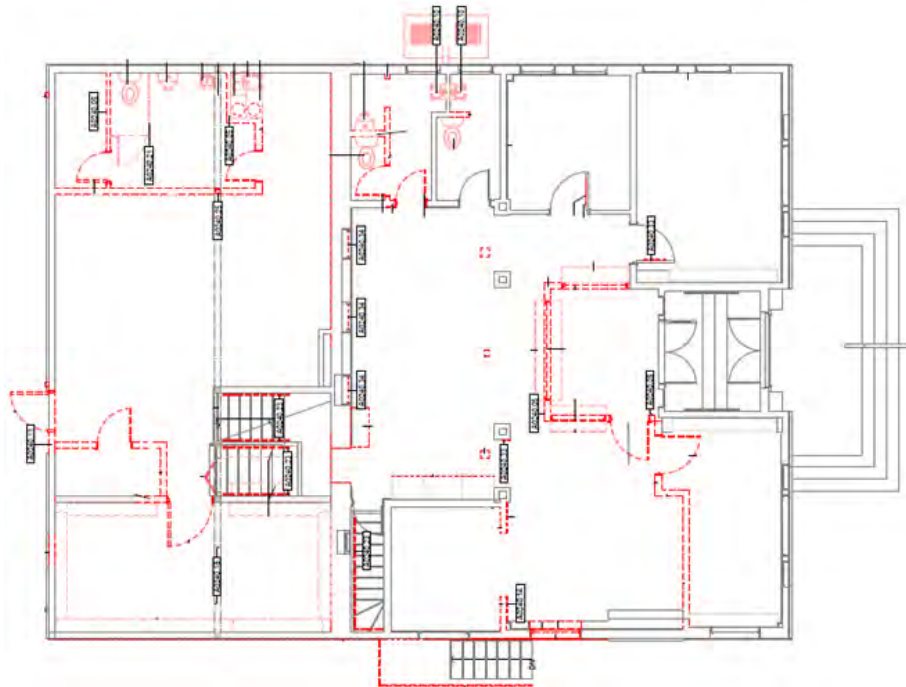


Figure 5: Demolition plan, first floor of addition and main floor of original building showing the non-original partition walls that would be removed as part of the rehabilitation. Plans courtesy of ORW Architecture. November 2022.

The first floor of the non-original 1980s addition would be reconfigured to include a new lobby, kitchen, accessible bathroom, and conference room. The second floor of the non-original rear addition would be reconfigured into an open floorplan with at least twelve individual workspaces. All existing (non-original) walls, fixtures and finishes within the addition would be removed and replaced to accommodate the new floor plan (see **Figure 6**).

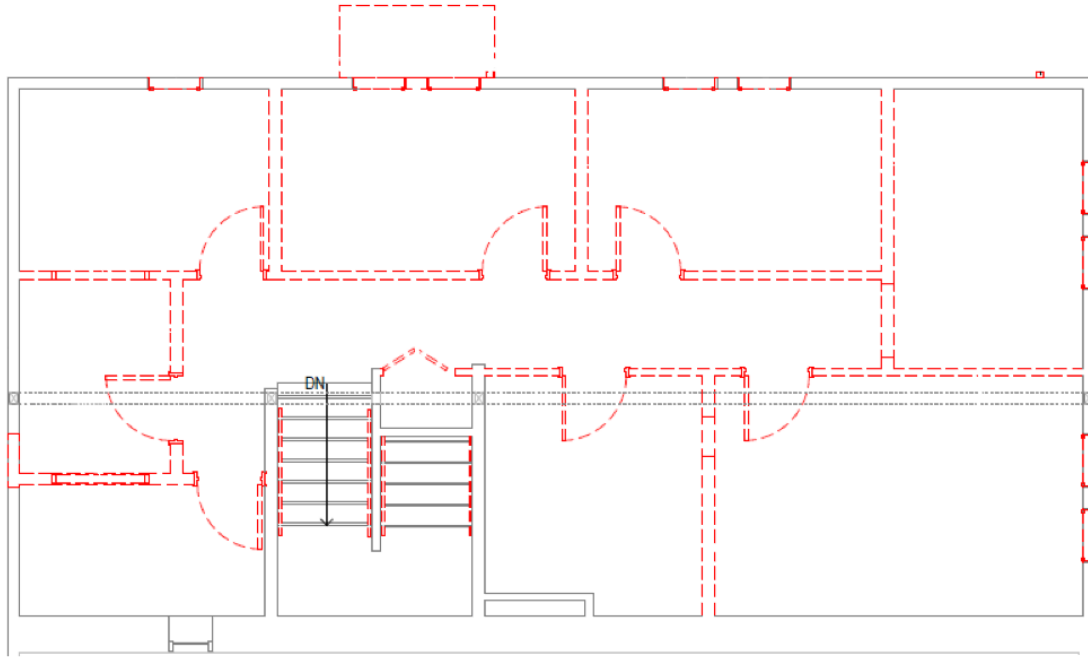


Figure 6: Demolition plan, second story addition, showing removal of non-original/character-defining walls. Plans courtesy of ORW Architecture. November 2022.

For more detailed information on the building's significant features, refer to the HSR in Appendix D, which includes more information on the character-defining-features of the building and identifies the appropriate treatment recommendations for each of the features that were in need of repair to ensure compliance with the Secretary of the Interior's Standards for Rehabilitation.

1.3 Methodology

GPA conducted a field survey of the property on March 29, 2022. Andrea Gavin, Principal Architectural Historian and Emma Haggerty, Associate Architectural Historian, conducted an intensive level survey of the property. Photographs were taken of both the exterior and interior of the building as well as the surrounding parcel. GPA also reviewed existing documentation on the building, including the National Register Nomination, the California Carnegie Libraries Multiple Property Listing (MPL), the Built Environment Resources Database (BERD), newspaper archives, and prior building permits. GPA prepared an HSR to guide the rehabilitation and provided general recommendations for preserving significant features of the building to retain the integrity of the building's original design by replacing features that have been removed, while also making appropriate changes to suit new and modern amenities (see Appendix D).

2. REGULATORY ENVIRONMENT

2.1 Applicable Federal Regulations

Federal regulations applicable to the undertaking include the National Environmental Policy Act, (NEPA) and Section 106 of the National Historic Preservation Act (Section 106) codified in the Code of Federal Regulations Part 800.

2.1.1 National Environmental Policy Act

The National Environmental Policy Act (NEPA) established that the federal government must use all practicable means to ensure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings.⁵ The Council on Environmental Quality (CEQ) regulations, which establish the steps necessary to comply with NEPA, requires the evaluation of the potential environmental consequences of all proposed federal activities and programs. NEPA directs federal agencies to use all practicable means to "Preserve important historic, cultural, and natural aspects of our national heritage..." If the presence of a significant environmental resource is identified during the scoping process, federal agencies and their agents must take the resource into consideration when evaluating Project effects. Historic properties are considered part of the environment that requires consideration in the NEPA process. NEPA requires that impacts on cultural resources be evaluated during the NEPA review process, in coordination with procedures established by Section 106 of the National Historic Preservation Act (NHPA).

2.1.2 Section 106 of the National Historic Preservation Act

The National Historic Preservation Act (NHPA) (Public Law 89-665; 16 U.S.C. 470 et seq.) is legislation that was passed in 1966, to preserve historical and archaeological sites in the United States. The act created the National Register of Historic Places (NRHP), the list of National Historic Landmarks (NHL), and the State Historic Preservation Officers (SHPO). Among other things, the act requires federal agencies to evaluate the impact of all federally funded or permitted Projects on historic properties through a process known as Section 106 Review.

Section 106 of the NHPA requires federal agencies that license or fund Projects to consider the undertaking's effects on historic properties. For the purposes of Section 106 of the NHPA, a "historic property" is a resource (prehistoric or historic district, site, building, structure, or object) that is included in, or eligible for inclusion in, the NRHP. Section 106 review gives equal consideration to properties that have already been included in the NRHP as well as those that have not yet been included, but that meet one or more of the NRHP Criteria.

The NRHP is the official list of the nation's historic places worthy of preservation. Authorized by the NHPA of 1966, the National Park Service's (NPS) NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources. The Yreka Carnegie Library is listed on the NRHP.

National Register Criteria for Evaluation

For a property to be considered a "historic property" for the purposes of Section 106 Compliance, it must be at least 50 years of age and possess significance in American history and culture,

⁵ U.S. Congress, 1969, National Environmental Policy Act of 1969, as amended, 42 USC Section 4331, <http://ceq.hss.doe.gov/nepa/regs/nepa/nepaeqia.htm>.

architecture or archaeology.⁶ To be included in the NRHP, a property of potential significance must meet one or more of the four established Criteria as outlined by the National Park Service:

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

Physical Integrity

According to National Register Bulletin #15, “to be eligible for listing in the NRHP, a property must not only be shown to be significant under National Register Criteria, but it also must have integrity.”⁷ Integrity is defined as “the ability of a property to convey its significance.”⁸ Within the concept of integrity, the NRHP recognizes seven aspects or qualities that in various combinations define integrity. They are feeling, association, workmanship, location, design, setting, and materials, and they are defined as follows:⁹

1. Location is the place where the historic property was constructed or the place where the historic event occurred.
2. Design is the combination of elements that create the form, plan, space, structure, and style of a property.
3. Setting is the physical environment of a historic property.
4. Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
5. Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
6. Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
7. Association is the direct link between an important historic event or person and a historic property.

To clarify the responsibilities of federal agencies with regard to Section 106 compliance, the Advisory Council on Historic Preservation (ACHP) has issued *36 Code of Federal Regulations (CFR) Part 800: Protection of Historic Properties, Regulations of the Advisory Council on Historic Preservation Governing the Section 106 Review Process*. These regulations guide the implementation of Section 106, identify the participants in the Section 106 compliance process; define key terms; and delineate the process of review and consultation. Although 36 CFR 800 et seq.

⁶ Title 36 Code of Federal Regulations Part 60.4. Note that industry standard looks at properties more than 45 years old to account for sufficient time to pass during project planning and construction.

⁷ National Park Service, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: National Park Service, revised 1998), 44.

⁸ *Ibid.*, 44-45.

⁹ *Ibid.*, 44-45.

do not dictate how each federal agency shall implement the requirements of Section 106 of the NHPA, it provides for the requirements that must be followed. This technical report has been prepared in accordance with 36 CFR 800.

2.2 Applicable State Regulations

State regulations applicable to the undertaking include the California Environmental Quality Act (CEQA).

2.2.1 California Environmental Quality Act

Under CEQA, state and local public agencies are required to identify the environmental impacts of proposed discretionary activities or Projects, determine if the impacts will be significant, and identify alternatives and mitigation measures that will substantially reduce or eliminate significant impacts to the environment. Historical resources are considered part of the environment and a Project that may cause a substantial adverse effect on the significance of a historical resource is a Project that may have a significant impact on the environment. The definition of "historical resources" for the purposes of CEQA includes properties listed in or eligible for listing in the California Register of Historical Resources (CRHR). Properties that are listed in the NRHP are automatically included in the CRHR. Furthermore, a property is presumed to be a historical resource if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant.¹⁰

California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register of Historical Resources. The CRHR is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.¹¹

The CRHR consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The following are automatically included in the CRHR:

- California properties listed in the National Register and those formally Determined Eligible for the National Register.
- State Historical Landmarks from No. 0770 onward.
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.¹²

California Register Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the CRHR are based upon NRHP criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the

¹⁰ California Public Resources Code Section 5024.1 and 14 California Code of Regulations Sections 4850 & 15064.5(a)(2).

¹¹ California Public Resources Code Section 5024.1 (a).

¹² California Public Resources Code Section 5024.1 (d).

CRHR, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the CRHR may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the CRHR is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.¹³ The Yreka Carnegie Library is listed on the CRHR because it is listed in the NRHP.

¹³ 14 California Code of Regulations Section 4852.

3. IDENTIFICATION OF HISTORIC PROPERTIES

In accordance with 36 CFR 800.4, one historic property, the Yreka Carnegie Library, was identified within the Project’s Area of Potential Effect (APE) for this undertaking. It was individually listed in the National Register of Historic Places (NRHP #92000270) in 1992 as part of the California Carnegie Libraries Multiple Property Listing (MPL). The following section outlines the efforts to identify historic properties within the Project’s APE.

3.1 Area of Potential Effects (APE)

The APE is the area that has the potential to be directly or indirectly affected by the proposed undertaking and may include physical, auditory, vibratory, or visual effects. Due to the nature of this rehabilitation Project, the APE was limited to the subject parcel (See **Figure 7**). The horizontal extent of the APE includes the single parcel where the proposed Project is to be completed; the direct APE is the building footprint itself, whereas the indirect APE includes the entire parcel and parking areas. The maximum extent of the vertical APE would only occur in the areas to the north (rear) of the library where the proposed posts to support a balcony would be installed to a maximum depth of five (5) feet (see Appendix A, APE Map). While not located within the boundaries, the property is located adjacent to the boundaries of the West Miner Historic District (NRHP #72000258). Since the proposed Project will only impact the Historic Carnegie Library, the district is not included in the indirect APE.



Figure 7: Outline showing the APE for the proposed Project. (Base image: Bing Maps, 2022).

3.2 Consultation with Potentially Interested Parties

In accordance with 36 CFR 800.2a(4), 36 CFR 800.3e and 800.4a(3), the agency official has included public input and reached out to parties that may have an interest in this undertaking. On November 29, 2022, the City of Yreka sent letters to interested parties to notify them of the proposed Project and to seek comments regarding historic properties that might be affected by the undertaking. The letter was sent again electronically on December 13, 2022 as a follow-up. (Refer to Appendix B for copies of all Correspondence). Following is a list of the interested parties that were contacted as part of the consultation process as well as their responses.

Table 3 - Correspondence Log of Potentially Interested Parties	
Potentially Interested Party	Correspondence
Siskiyou County Planning Department 806 Main Street, Yreka, CA 96097 Phone: (530) 841-2100 Email: planning@co.siskiyou.ca.us	Letter sent by USPS on November 29, 2022. Email sent December 13, 2022. No response received as of December 2022.
Yreka Planning Department 701 Fourth Street, Yreka, CA 96097 Phone: (530) 841-2324 Email: jlucchesi@ci.yreka.ca.us	Letter delivered on November 29, 2022. Email sent December 13, 2022. Ms. Lucchesi confirmed she received the letter and email on December 13, 2022.
Siskiyou County Library 719 Fourth Street, Yreka, CA 96097 Phone: (530) 842-8807 Email: library@co.siskiyou.ca.us	Letter sent by USPS on November 29, 2022. Email sent December 13, 2022. No response received as of December 2022.
Siskiyou County Historical Society P.O. Box 1715, Yreka, CA 96097 Phone: (530) 572-1099 Email: schs.main@gmail.com Website: https://sisqhistory.org/	Letter sent by USPS on November 29, 2022. Follow-up letter sent to P.O. Box on December 7, 2022. Email sent December 13, 2022. No response received as of December 2022.
Genealogical Society of Siskiyou County P.O. Box 1405, Yreka, CA 96097 Phone: (530) 842-0277 Email: gssc1@att.net Website: http://www.siskiyougenealogy.org/	Letter sent by USPS on November 29, 2022. Follow-up letter sent to P.O. Box on December 7, 2022. Email sent December 13, 2022. No response received as of December 2022.

3.3 Results of Records Search

GPA reviewed existing information on the historic property, including the NRHP Nomination of the Yreka Carnegie Library, the Built Environment Resources Database (BERD), the California Carnegie Libraries MPL which the building is also included under, newspaper archives, and prior building permits. Review of the existing documentation revealed that the Carnegie Library is adjacent to the boundaries of the West Miner Historic District which is listed on the NRHP. Although the Yreka Carnegie Library is located outside the boundaries of the West Miner Historic District, the proposed project will have limited visibility to the public right-of-way. The new balcony is limited to the north elevation which will not be visible to the public right-of-way. The new ADA ramp along the west elevation will be partially visible to the public right-of-way but will not face the boundaries of the West Miner Historic District.

3.4 Description and Significance of Historic Property

The Historic Carnegie Library is a one-story concrete masonry building that was constructed in the Classical Revival style in 1915, with a two-story addition constructed at the rear in 1980 (see **Figures 8 & 9**). The original building is rectangular in plan and has a flat roof with a raised parapet and Projecting cornice with dentil detailing that wraps around the entire original building. The exterior is clad in horizontally scored cement. The double entry doors are slightly recessed and below a divided light, transom window. Two tripartite window groupings with divided light transoms above flank either side of the main entryway. Along the base of the building is a slightly projecting base (see **Figure 8**).



Figure 8: South elevation, view facing north. GPA 2022.



Figure 9: East elevation, view facing southwest. GPA 2022.

The 1980 addition mimics the design and materials of the original building. It is also rectangular in plan with a flat roof, raised parapet, and Projecting cornice similar to the original. The addition is shorter in height and narrower in width than the original building, creating a visual distinction between the two volumes.

The subject building was occupied by the local public library from 1915 to 1970, when it merged and was relocated with the Siskiyou County Library branch a few blocks away. After the merger, the library housed the Yreka Police Department until 2019. As of the date of this report, the building is vacant.

The subject building is listed in the NRHP at the local level of significance under Criteria A and C within the context of “Carnegie Library Development in California and the Architecture it Produced, 1899-1921.” The library derives its significance under Criterion A from its association with the history of library development in California, and under Criterion C for exemplifying a specialized building type resulting from Andrew Carnegie’s library philanthropy and popular styles of that era. For further information on the building’s historic context, please refer to the HSR in Appendix D.

4. FINDINGS

The Project's potential to affect the subject building are evaluated under Section 106 and CEQA. As explained more fully below, the proposed rehabilitation of the library would not cause an adverse effect on the historic property as defined by Section 106 and would not have a significant impact on the historical resource as defined by CEQA.

4.1 Thresholds of Significance

The threshold for determining the significance of effects to cultural resources is defined differently for Section 106 and CEQA, as described below.

4.1.1 Adverse Effects for Section 106

According to 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

Examples of adverse effects on historic properties include, but are not limited to:

- i. Physical destruction of or damage to all or part of the property;
- ii. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
- iii. Removal of property from its historic location;
- iv. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- v. Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- vi. Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- vii. Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.¹⁴

4.1.2 Significant Impacts for CEQA

The State CEQA Guidelines set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states:

¹⁴ 36 CFR 800.5(a)(2)(i through vii).

A Project with an effect that may cause a substantial adverse change in the significance of an historical resource is a Project that may have a significant effect on the environment.

Title 14 California Code of Regulations Section 15064.5(b)(1) further clarifies “substantial adverse change” as follows:

Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Title 14 California Code of Regulations Section 15064.5(b)(1) in turn explains that a historical resource is “materially impaired” when a Project:

Demolishes or materially alters in an adverse manner those physical characteristics that convey its significance and that justify its inclusion in or eligibility for inclusion in the California Register, local register, or its identification in a historic resources survey.

As such, the test for determining if a Project will have a significant impact on an identified historical resource is whether or not the Project will alter in an adverse manner the physical integrity of the historical resource such that it would no longer be eligible for listing in the National or California Registers. Projects that may affect historical resources are considered mitigated to a level of less than significant if they are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards).¹⁵

4.1.3 Secretary of the Interior’s Standards

The Standards were issued by the National Park Service and are accompanied by guidelines for four types of treatments for historical resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The Standards for Rehabilitation are most applicable for this Project, as it proposes changes to the historic property aimed at extending its useful life.

The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

¹⁵ 14 CCR Section 15126.4(b).

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6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
 7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
 8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
 9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
 10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

4.2 Analysis of Project for Adverse Effects per Section 106

The Project's potential effects to the Yreka Carnegie Library per Section 106 and CEQA are discussed below.

1. *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

The property will be given a new use as part of the proposed Project. This would require minimal change to the original distinctive features on the interior and exterior.

The interior remodel to the historic portion of the building would restore historic features such as the open floor plan, original wall paneling, and ceilings.

The new exterior ramp and balcony will not negatively impact distinctive materials, features, spaces, or spatial relationships on the exterior of the historic portion of the building.

Therefore, the proposed Project complies with Standard #1.

2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*

The proposed Project aims to restore and preserve the original materials and design of the interior and exterior of the building.

Original interior elements will be retained, repaired, or restored. No distinctive materials, features, or spaces would be removed on the interior of the building.

Although the Project would remove one exterior original window to convert it into a door to accommodate the ADA ramp, the width of the window opening would not be changed and the transom above the window would be preserved. The window is located on a less visible, secondary elevation. Basement level fenestration will be covered by the new ramp but will not be removed.

Therefore, the proposed Project complies with Standard #2.

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3. *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

The proposed changes to the property will not create a false sense of history.

Original interior elements will remain or be repaired. Some non-character defining features such as hanging fluorescent lighting, the vestibule walls, laminate flooring, and a drop ceiling, will be replaced with a compatible replacement or removed entirely to expose the building's original material.

The proposed exterior changes would occur to the rear of the building and would include adding new windows and doors on the 1980's (non-contributing) addition. The new windows would be contemporary replacements and would not include old windows from other buildings. As the new windows would be installed on the non-original portion of the building, they would not be conjectural features.

Therefore, the Project is consistent with Standard #3.

4. *Changes to a property that have acquired significance in their own right will be retained and preserved.*

No changes to the property have acquired significance in their own right. The rear addition was constructed for the Yreka Police Department outside the period of significance and does not retain its own significance and will remain distinguished from the original part of the property.

Therefore, the Project is consistent with Standard #4.

5. *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

Distinctive materials, features, and finishes that characterize the building will be preserved.

Distinctive exterior features include concrete masonry construction, wood windows and doors, stepped parapet, and overhanging eaves with dentil details. These features will be preserved or restored where necessary.

Distinctive interior features include wood paneling and shelves, wood baseboards, wood trim. These features will be preserved or restored where appropriate.

The majority of these features will be retained or repaired and restored. As previously mentioned, only one exterior window would be converted into a door to accommodate the new ADA ramp, but it is located on a secondary elevation with limited visibility from public right of way. The basement level windows, and door would be retained behind the new ramp.

Therefore, the Project is consistent with Standard #5.

6. *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

The Project proposes to retain all distinctive features. Of those historic features that are deteriorated, they will be repaired rather than replaced. There are no interior or exterior features that are damaged beyond repair and therefore no features are proposed to be replaced as part of the Project.

Therefore, the Project is consistent with Standard #6.

7. *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

No chemical or physical treatments are proposed on the interior or exterior of the building. If the exterior wood trim or interior paneling require repainting or re-staining, then the paint removal and repainting would be carried out in accordance with NPS Technical Briefs 9 & 10.

Therefore, the Project is consistent with Standard #7.

8. *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

The proposed Project would not include any ground-disturbing activities that would likely have the potential to affect archaeological resources. However, should any archeological resources be encountered while placing the supports for the rear balcony, the construction would stop, and the appropriate authorities would be notified to analyze the discovery and determine whether they should be removed or preserved in place.

Therefore, the Project is consistent with Standard #8.

9. *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

The addition of an exterior balcony and ramp would not destroy any of the historic materials or features that characterize the historic property. The balcony would be located on the rear addition that was constructed outside the building's historic period of significance, and it would not be visible from the public right-of-way. The ramp would be built adjacent to the west elevation but would not physically impact the exterior walls. One historic window would be converted into a door to accommodate the new ADA entry; however, the door would use the original fenestration pattern as the existing window, which could be easily restored using the design of the windows throughout the building.

The new construction on the interior is mostly limited to the addition, which was constructed outside the historic period of significance. All of the new interior work would be contemporary features and therefore differentiated from the old, but compatible from the historic property in design and materials.

Therefore, the Project is consistent with Standards #9.

10. *New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

The new addition of an exterior balcony and ramp have been designed so that they are not physically attached to the historic portion of the building. Therefore, should they be removed in the future, they would not destroy the historic materials that characterize the property.

The new construction within the interior is limited to the 1980s (non-contributing) addition and therefore would not negatively impact the essential form and integrity of the historic portion of the property. There is no new interior construction proposed as part of the Project. The proposed demolition within the historic interior spaces would be limited to non-original

partition walls that after removed, would restore the original special configuration of the historic library.

Therefore, the Project is consistent with Standards #10.

4.2.1 Integrity Analysis of Project for Adverse Effects per Section 106

The following paragraphs provide a detailed analysis of whether the proposed Project would diminish the integrity of the historic property's location, design, setting, materials, workmanship, feeling, or association.

Location

The proposed Project would not relocate the building. Therefore, the historic building's integrity of location would be retained.

Design

The proposed Project would rehabilitate the interior and exterior of the building, but the proposed work would not impact the building's historic design. The interior work would include restoration or retention of character-defining features such as the wood trim, shelves and paneling. The exterior work would include replacing existing (non-original/non-character-defining) windows located in the non-original addition, which was constructed outside the period significance. The replacement of non-original and non-character defining features is consistent with the Secretary of the Interior's Rehabilitation Standards.

The majority of the original features located on the historic portion of the building will be maintained, repaired, or restored depending on their condition. A total of one door and three windows will be modified that are located on the original part of the building. The most northern window on the west elevation on the original portion of the building would be converted into a door to allow for an entrance for an ADA accessible ramp that is to be added to the exterior of the property. The ramp would be free-standing along the west elevation and would not impact the historic masonry. The transom above the modified window opening would also be retained. The basement door and two basement windows would be covered by the ramp and would be infilled in place, so they are no longer accessible. However, the door and two windows in the basement would be visible from the inside. This would maintain the historic materials and features of the building. While these alterations will create minimal visible changes to west side of the building, they would not negatively impact the overall historic design of the building. The proposed alterations are in keeping with the Rehabilitation Standard Nos. 9 and 10, because the additions are differentiated from the original building, yet compatible in materials and design, and if removed in the future would not impair the essential form and integrity of the historic property.

Setting

The overall setting of the subject parcel will remain as it has historically been. The integrity of setting is not diminished by this work.

Materials

The historic materials that characterize the Yreka Carnegie Library include its concrete masonry walls, as well as wood windows and doors. One original window is proposed to be removed and the opening will be extended for a door opening. The basement door and two windows will be infilled and covered by the proposed ADA ramp. The remaining windows, doors, and other character-defining

features on the exterior of the building will either be retained, repaired, or restored. Therefore, the integrity of materials would be preserved.

Workmanship

As stated above, the Project would not negatively impact the integrity of design and materials of the segment; therefore, it would not negatively impact the integrity of workmanship. Workmanship of the character-defining-features would be retained throughout the interior and exterior of the building with the majority of the changes happening to the rear addition that was constructed outside the period of significance. The original features of the building that would be changed as part of the Project are located on the west elevation and include three windows and one door. Since the majority of the windows, doors, and other character defining feature of the building's interior and exterior will be retained or restored, the integrity of workmanship is not substantially diminished by these minor changes.

Feeling

The integrity of feeling of the subject building is tied to its integrity of location, setting, design, materials, and workmanship. The majority of the character-defining features of the building will remain unchanged, as will the location and setting. Overall, it will continue to convey its significance. Therefore, the integrity of feeling is not diminished by the proposed Project.

Association

As discussed above, the Project would impact a comparatively small fraction of the physical integrity of the building, which is what allows it to convey its associative architectural significance as a library building. Therefore, the historic property's integrity of association would not be diminished.

4.2.2 Summary of Effects per Section 106

The proposed undertaking would make minor changes to the physical integrity of building and the building would largely remain unchanged or be restored. The building's integrity of design, materials, workmanship, feeling, and association would not be diminished in an appreciable manner. Although the Project includes alteration to one of the windows on the historic portion of the property, the Project would not cause an adverse effect on the historic property as defined in 36 CFR 800.5 because the project complies with the Secretary of the Interior's Standards for Rehabilitation.

4.2.3 Summary of Effects per CEQA

Projects that may affect historical resources are considered mitigated to a level of less than significant if they are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards).¹⁶ Therefore, because this Project complies with the SOIS for Rehabilitation, then Project would not cause a substantial adverse change in the significance of this historical resource and would not cause a significant impact on the environment.

¹⁶ 14 CCR Section 15126.4(b).

5. RECOMMENDATIONS

Recommendations for Section 106 and CEQA are discussed below.

5.1 Recommendations for Section 106

The proposed Project would result in minor alterations to the Yreka Carnegie Library but would not cause an adverse effect on the historic property as defined in 36 CFR 800.5(a). Without any changes to the Project as proposed, the Project would result in a Finding of No Adverse Effect for Section 106. No mitigation is required. No further recommendations are proposed.

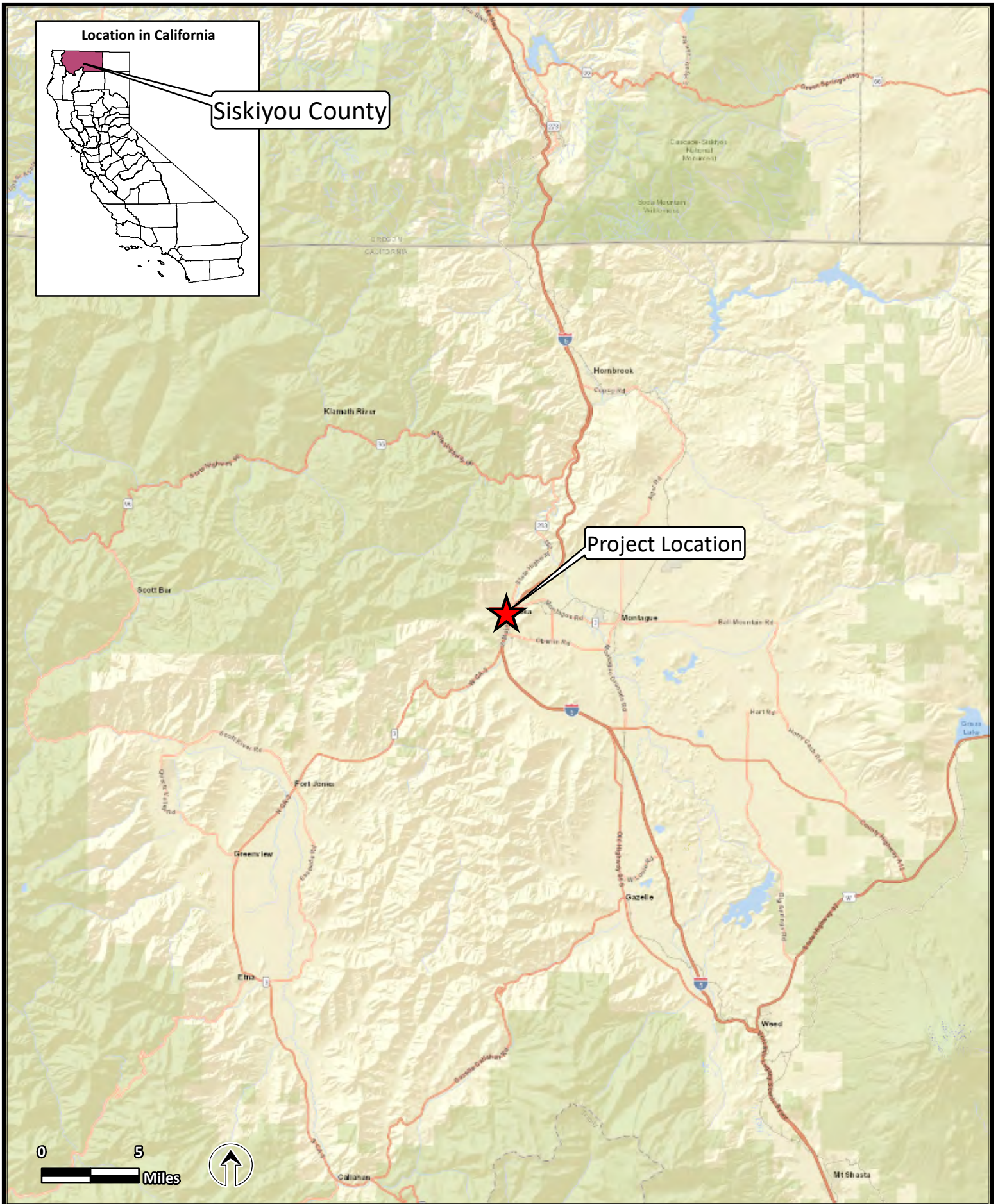
5.2 Recommendations for CEQA

The alterations proposed by the Project would not result in the material impairment of the Yreka Carnegie Library. The impact of the Project on the historical resource would be less than significant. Therefore, the Project would not cause a substantial adverse change as defined by CEQA. As the Project would have a less-than-significant impact on historical resources for CEQA, no mitigation is required or recommended.

6. REFERENCES

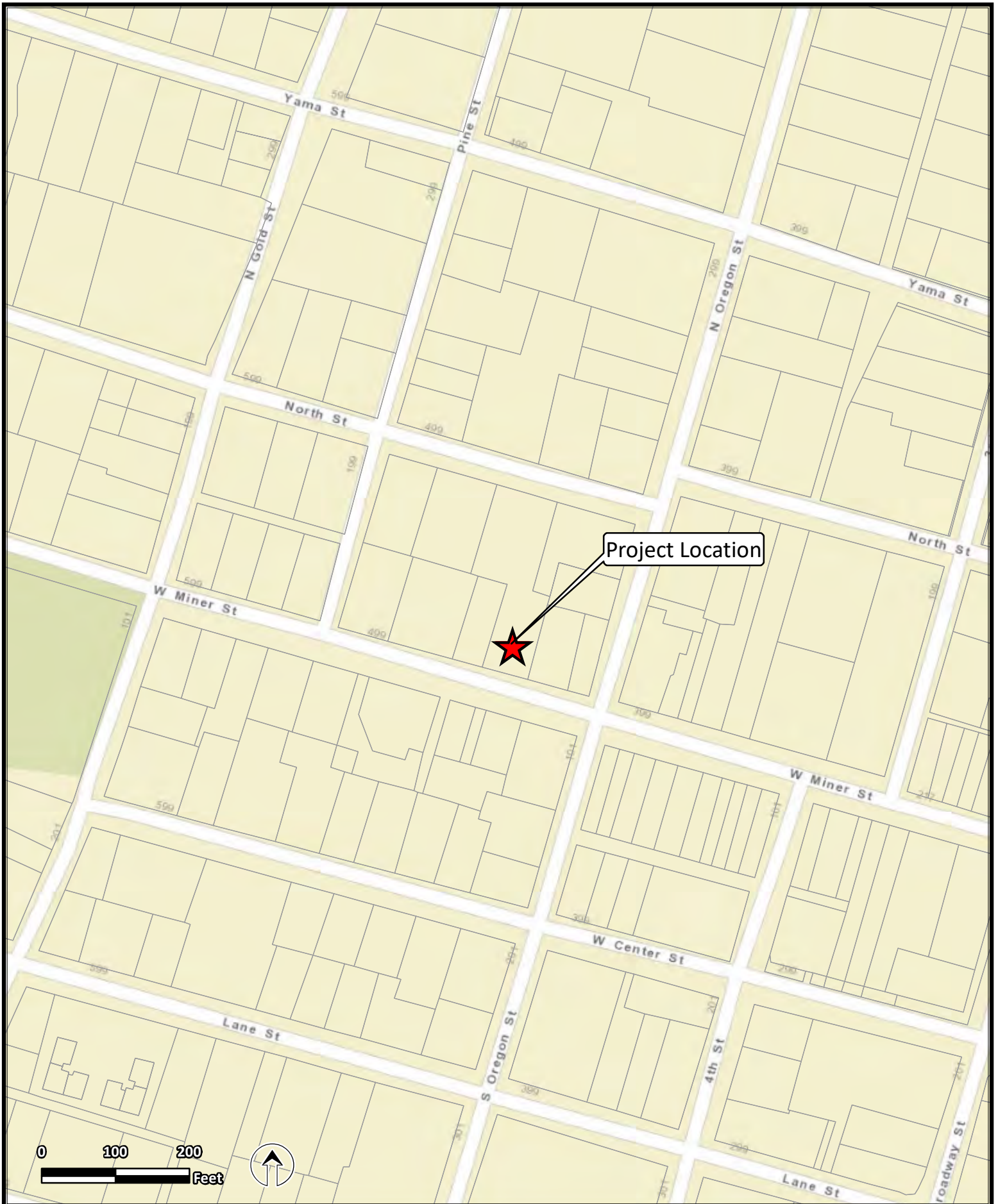
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Attachment A: Maps



Sources: ESRI 2022.

**FIGURE 1. REGIONAL LOCATION
Yreka Carnegie Library**



Sources: ESRI 2022.

**FIGURE 2. PROJECT LOCATION
Yreka Carnegie Library**



Sources: Siskiyou County 2022; ESRI 2022.

**Area of Potential Effects
Yreka Carnegie Library Rehabilitation Project
City of Yreka, Siskiyou County (T45N R7W, Yreka Quadrangle)**