
Appendix D4

Built Environment Inventory and Evaluation Report -
Tuolumne Facility

**BUILT ENVIRONMENT INVENTORY AND EVALUATION REPORT FOR
GOLDEN STATE NATURAL RESOURCES FOREST RESILIENCY
DEMONSTRATION PROJECT, CENTRAL SIERRA NEVADA
(TUOLUMNE) SITE,
TUOLUMNE COUNTY, CALIFORNIA**

Prepared for:

GOLDEN STATE FINANCE AUTHORITY

1215 K Street, Suite 1650
Sacramento, California 95814
Contact: Barbra Hayes

Prepared by:

DUDEK

1102 R Street
Sacramento, California 95811

Contact: Nicole Frank, MSHP; Sarah Corder, MFA; Fallin Steffen, MPS; and Kathryn Haley, MA

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ACHP	Advisory Council on Historic Preservation
API	Area of Potential Impact
APN	Assessor Parcel Number
BERD	Built Environment Resource Directory
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CRHR	California Register of Historical Resources
CCaIC	Central California Information Center
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
SPI	Sierra Pacific Industries
USACE	U.S. Army Corps of Engineers

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Executive Summary

The Golden State Finance Authority (Client) retained Dudek to complete this Built Environment Inventory and Evaluation Report as part of environmental compliance efforts in support of the Golden State Natural Resources Forest Resiliency Demonstration Project (proposed project) which is a response to the growing rate of wildfires in California, which has been exacerbated by hazardous excess fuel loads in forests, and the need to promote economic activity with California's rural counties. This report specifically addresses the Central Sierra Nevada (Tuolumne) site that is being studied as part of the larger Environmental Impact Report (EIR) being prepared in compliance with California Environmental Quality Act (CEQA). This report was originally drafted in May of 2021 and was revised to include correspondence with potential interested party correspondence in July 2023.

Dudek completed this report to identify the presence of built environment buildings, and/or structures, that may be considered CEQA historical resources. This report included the following components: (1) a California Historical Resources Information System (CHRIS) records search conducted at the Central California Information Center (CCaIC) for the proposed project area plus a 1-mile buffer; (2) a pedestrian surface reconnaissance of the Area of Direct Impact (ADI) for; (3) and historical significance evaluations for two properties located in the ADI: Property 1 Assessor's Parcel Numbers (APNs) 063-190-056, 063-350-004, 063-350-005, and 063-190-051) and Property 2 (Sierra Railroad – Mainline, Keystone Segment) located within the Project ADI.

The focus of this study is to address historic era-built environment resources (over the age of 45 as of 2021) located in the ADI as part of the documentation being prepared for this project in compliance with CEQA. Two historic era properties were identified in the ADI, including one previously documented built environment resource (P-55-000347), the Sierra Railroad – Mainline, Keystone Segment.

Dudek recorded and evaluated a segment of the Sierra Railroad (Property 2) and an abandoned mill that is defined for the purposes of this study as Property 1 and includes the following APNs:

- APN 063-190-056, Abandoned SPI Keystone Mill located at 12001 La Grange Road
- APN 063-190-051, American Wood Fibers located at 12015 La Grange Road
- APN 063-350-004, Residence located at 12051 La Grange Road
- APN 063-350-005, Residence located at 12055 La Grange Road

Property 1 was previously unevaluated for the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), or the Tuolumne County Register of Cultural Resources. As part of this study, Dudek recorded and evaluated the entirety of Property 1 under all NRHP, CRHR, and local criteria. As a result of Dudek's extensive archival research, field survey, and property significance evaluations, Property 1 was found ineligible for listing in the NRHP and the CRHR due to a lack of historical associations and architectural merit. For these same reasons, the property also does not rise to the level of significance for local designation in the Tuolumne County Register of Cultural Resources. As such, Property 1 does not qualify as a historical resource under CEQA.

Property 2 was previously evaluated in 2008 for the NRHP and the CRHR and found eligible under NRHP and CRHR Criterion A/1 as a contributor to the existing Sierra Railroad Historic District for its impact on the social and economic development in Tuolumne County. That study did not evaluate Property 2 under local designation criteria. As part of this study, Dudek recorded and evaluated Property 2 under local criteria. As a result of Dudek's extensive archival research, field survey, and property significance evaluations, and based on the significance evaluation from the 2008 JRP Historical Consulting Services report, the Sierra Railroad – Mainline, Keystone Segment continues to

appear eligible for listing in the NRHP and CRHR under Criteria A/1. Additionally, Property 2 was found to be eligible under the Tuolumne County Register of Cultural Resources Criteria 1 as a result of the updated evaluation conducted by Dudek. Therefore, Property 2 is considered a historical resource under CEQA.

1 Introduction

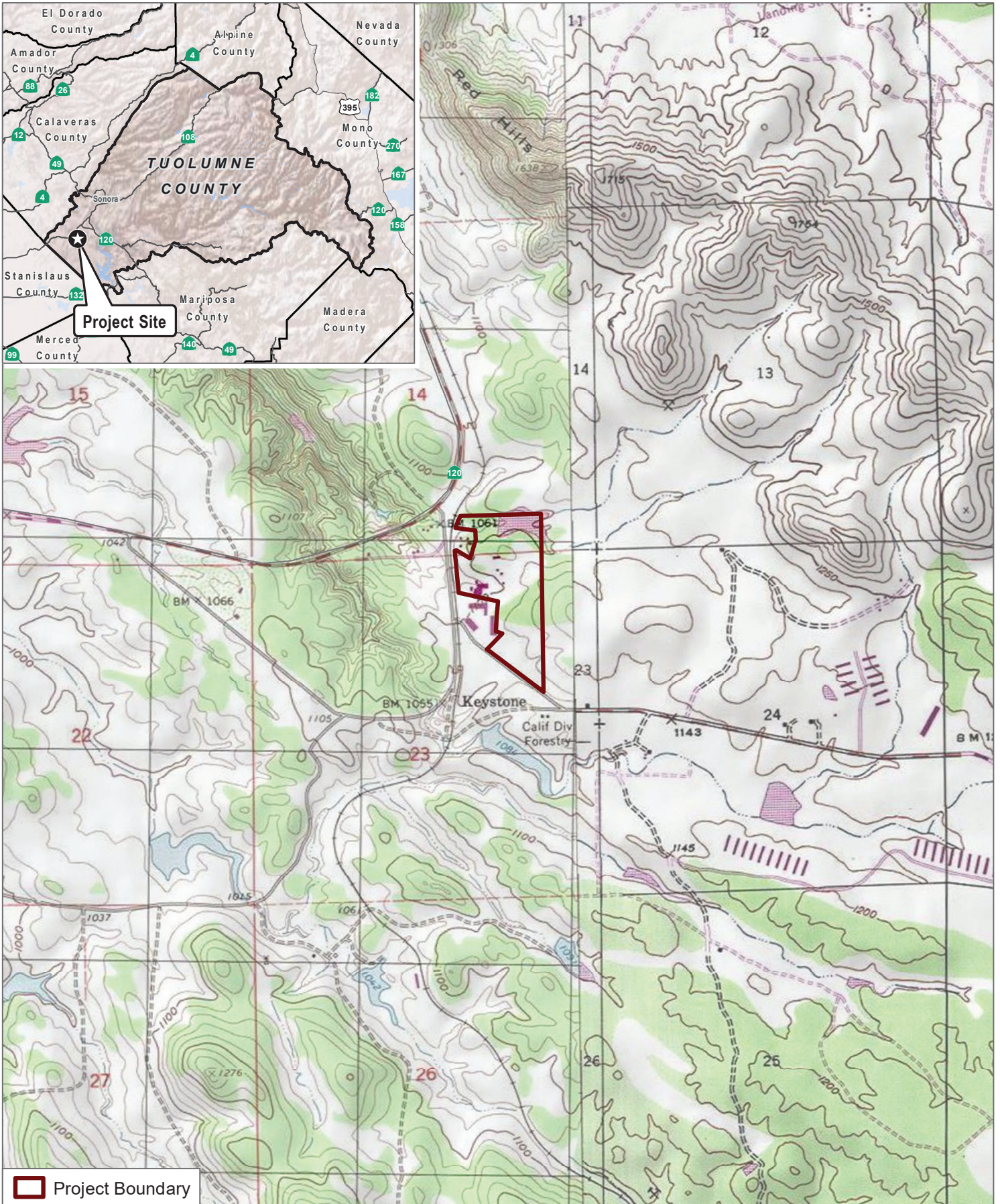
This section provides a description of the proposed Forest Resiliency Program Project, SPI Keystone (Project) including information about the Project description, location, and background. This section also presents a description of the API, project personnel, and the regulatory setting.

1.1 Project Information

1.1.1 Project Description and Location

The Golden State Finance Authority proposes to redevelop the site to facilitate the transport of forest material (such as trees or underbrush that have no lumber value) in by truck, conversion of such material into wood fuel pellets, and then shipment of the pellets from the Project area using the existing railroad line. The Project will occur within APN 063-190-056, the abandoned SPI Keystone Mill located at 12001 La Grange Road, Tuolumne County, California (Figure 1, Project Location). The Project intends to use the existing Sierra Railroad – Mainline, Keystone Segment to ship pellets from the site, which is located adjacent to 12001 La Grange Road (Figure 2, Area of Potential Impact).

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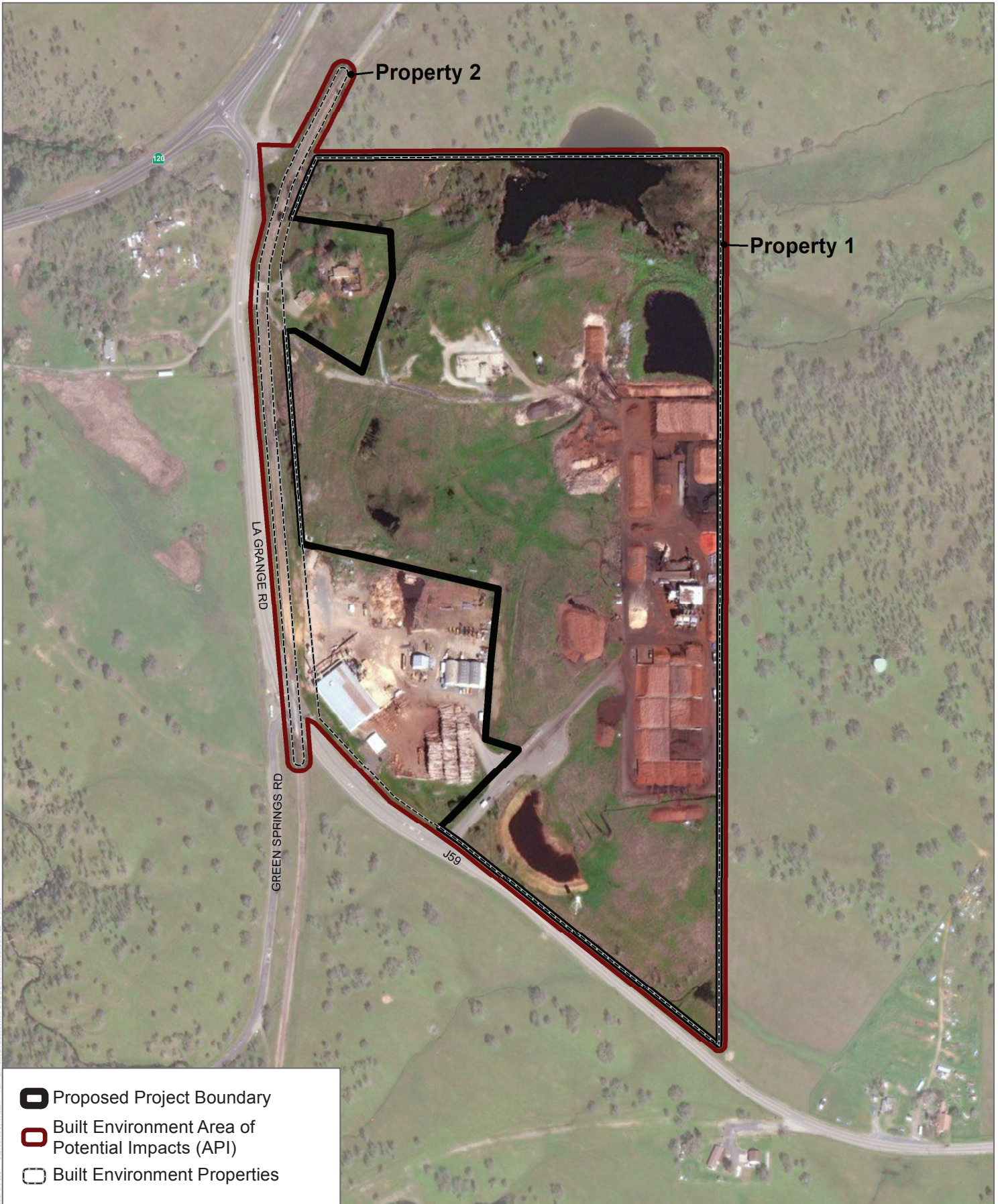


SOURCE: USGS 7.5-Minute Series Keystone Quadrangle



FIGURE 1
Project Location
 SPI Keystone Project

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SOURCE: Bing Maps (Accessed 2021), Tuolumne County 2020



FIGURE 2
 Built Environment Area of Potential Impacts (API)
 SPI Keystone Project

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1.2 Regulatory Setting

Federal, State, and local criteria are used in demonstrating cultural resource significance for the purposes of CEQA and are described below.

1.2.1 Federal

The National Historic Preservation Act (NHPA) established the NRHP and the President's Advisory Council on Historic Preservation (ACHP), and provided that states may establish State Historic Preservation Officers to carry out some of the functions of the NHPA. Most significantly for federal agencies responsible for managing cultural resources, Section 106 of the NHPA directs that:

[t]he head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP.

Section 106 also affords the ACHP a reasonable opportunity to comment on the undertaking (16 USC 470f).

Title 36 of the Code of Federal Regulations, Part 800 (36 CFR 800) implements Section 106 of the NHPA. It defines the steps necessary to identify historic properties (those cultural resources listed in or eligible for listing in the NRHP), including consultation with federally recognized Native American tribes to identify resources with important cultural values; to determine whether or not they may be adversely affected by a proposed undertaking; and the process for eliminating, reducing, or mitigating the adverse effects.

The content of 36 CFR 60.4 defines criteria for determining eligibility for listing in the NRHP. The significance of cultural resources identified during an inventory must be formally evaluated for historic significance in consultation with the ACHP and the California State Historic Preservation Officer to determine if the resources are eligible for inclusion in the NRHP. Cultural resources may be considered eligible for listing if they possess integrity of location, design, setting, materials, workmanship, feeling, and association.

Regarding criteria A through D of Section 106, the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, cultural resources, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that (36 CFR 60.4):

- A. Are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Are 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. have yielded or may be likely to yield, information important in prehistory or history.

The 1992 amendments to the NHPA enhance the recognition of tribal governments' roles in the national historic preservation program, including adding a member of an Indian tribe or Native Hawaiian organization to the ACHP.

The NHPA amendments:

- Clarify that properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization may be determined eligible for inclusion in the National Register.
- Reinforce the provisions of the Council's regulations that require the federal agency to consult on properties of religious and cultural importance.

The 1992 amendments also specify that the ACHP can enter into agreement with tribes that permit undertakings on tribal land and that are reviewed under tribal regulations governing Section 106. Regulations implementing the NHPA state that a federal agency must consult with any Indian tribe that attaches religious and cultural significance to historic properties that may be affected by an undertaking.

1.2.2 State

1.2.2.1 California Register of Historical Resources

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1[j]). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, enumerated below. According to California Public Resources Code Section 5024.1(c)(1-4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

1.2.2.2 California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- California Public Resources Code Section 21083.2(g) defines “unique archaeological resource.”
- California Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a) define “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource.” It also defines the circumstances when a project would materially impair the significance of an historical resource.
- California Public Resources Code Section 21074(a) defines “tribal cultural resources.”
- California Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- California Public Resources Code Sections 21083.2(b)–(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; CEQA Guidelines Section 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1[q]), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5[a]).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA 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” (CEQA Guidelines

Section 15064.5(b)[1]); PRC Section 5020.1(q)). In turn, CEQA Guidelines Section 15064.5(b)(2) states the significance of an historical resource is materially impaired when a project:

- (1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a]–[c]).

California Public Resources Code Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC section 21083.2[a]; CEQA Guidelines Section 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as tribal cultural resource (PRC Section 21074[c], 21083.2[h]), further consideration of significant impacts is required. CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Public Resources Code Section 5097.98.

1.2.3 Local

1.2.3.1 Tuolumne County Register of Cultural Resources

Tuolumne County General Plan Update EIR: Section 4.5 Cultural Resources

Tuolumne County Register of Cultural Resources. Since the Tuolumne County Board of Supervisors adopted requirements for the County Register of Cultural Resources in July 1992, it has designated 17 properties on this register and twelve properties that occur in the unincorporated County.. Pursuant to Implementation Program 9.C.e in the County’s Cultural Resources Management Element, the County Register of Cultural Resources applies to all properties contained within cultural resources inventories which have been or are assigned a National Register designation of 1 (listed on the National Register), 2 (determined eligible for listing by formal process involving federal agencies), 3 (appears to be eligible for listing in the judgment of the person completing the form), 4 (might become eligible for listing), or 5 (ineligible for listing but of local interest and eligible for the Tuolumne County Register of Cultural Resources). Inclusion on the register qualifies properties to use the State Historical Building Code, to enter into a Mills Act Contract for qualifying rehabilitations and maintenance, and for alternative development standards.

Priority 1: A resource listed on the National Register of Historic Places (National Register of Historic Places designation of 1)

Priority 2: A resource:

1. Determined to be eligible for or potentially eligible for listing on the National Register of Historic Places based upon an inventory of the resource resulting in a National Register of Historic Places designation of 2, 3, or 4; or
2. Listed on or officially designated as eligible for the California Register of Historical Resources; or
3. Listed on the Tuolumne County Register of Cultural Resources; or
4. A resource listed as a contributing resource in a cultural resource inventory within an existing HDP zone or which is eligible to be included within an HDP zone.

Priority 3: A resource determined to be eligible for listing in the National Register of Historic Places based upon an inventory of the resource resulting in a National Register of Historic Places designation of 5.

Priority 4: A resource determined to be ineligible for listing on the National Register of Historic Places based upon an inventory of the resource resulting in a National Register of Historic Places designation of 6; and determined to be ineligible for listing on the California Register of Historical Resources; and determined to be ineligible for listing on the Tuolumne County Register of Cultural Resources.

Designation Criteria

1. Exemplifies or reflects significant elements of Tuolumne County’s cultural, social, religious, economic, political, engineering or architectural history
2. Identified with historic persons or with important local, state or national history
3. Embodies distinguished architectural characteristics valuable for study or a period style or method of construction or is a valuable example of the use of indigenous materials or workmanship
4. Representative of a notable work of a master builder or architect

“Cultural Resource” is defined in Chapter 14.04:

14.04.100 Cultural Resource. “Cultural resource” means any building, structure, object, site, district, or other item of cultural, social, religious, economic, political, scientific, agricultural, educational, military, engineering or architectural significance to the citizens of Tuolumne County, the State of California, or the nation which is 50 years of age or older or has been listed on the National Register of Historic Places, the California Register of Historical Resources, or the Tuolumne County Register of Cultural Resources. The term "cultural resource" includes historical resources and historic properties.

“District” is defined in Chapter 14.04:

14.04.150 District. “District” means a grouping of resources (including historic properties, historical resources, and cultural resources) linked either by geography or by association, which function as described in 36 CFR 60.4 (Code of Federal Regulations) and the National Register of Historic Places. The district may have been planned or designed as a unit (e.g., a neighborhood or college campus) or through association has been historically united (e.g., central business districts or transportation networks). Other examples of districts are residential neighborhoods, commercial areas, industrial complexes, civic centers, defined communities, water distribution systems, groups of habitations and associated activity areas, large ranches or estates, and large parks.

The processes for Cultural Resource designation in Tuolumne County is explained in Chapter 14.06 as follows:

14.06.100 Determining cultural resource priority designations for resources which already have been evaluated by a qualified professional. For cultural resources which already have been evaluated by a qualified professional, the criteria in Table 14.06(B) shall be used to establish the cultural resource priority designation for the management of cultural resources as established in Table 14.06(A) and Sections 14.06.030 through 14.06.090. (Ord. 2280 § 17 (part), 1999).

1.3 Area of Potential Impact

The API is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties. Determination of the API is influenced by a project’s setting, the scale and nature of the undertaking, and the different kinds of impacts that may result from the proposed project.

Delineation of the API for Built Environment follows the maximum possible API (direct and indirect) resulting from the proposed Project (see Figure 2, Area of Potential Effect). As such, the API slightly extends outside the proposed Project site boundary and encompasses Property 1’s historic boundary, which was comprised of four APNs including 063-190-056, 063-350-004, 063-350-005, and 063-190-051 (69.86 acres); and Property 2, a segment of the Sierra Railroad – Mainline, Keystone Segment which ran 0.5 miles. Although not located directly within the proposed Project footprint, the railroad segment is included in the built environment API because there are potential uses for the railroad being considered in the development of this Project. The following two properties are located in the API and discussed in detail in this study:

Property 1: Currently Property 1 consists of the following APNs (063-190-056, 063-350-004, 063-350-005, and 063-190-051). Historically, the mill property was one single parcel that encompassed all of the above-listed current APNs.

Property 2: The Sierra Railroad – Mainline, Keystone Segment included in the Project API is located about 10 miles southeast of Jamestown in rural Tuolumne County, south of the intersection of State Highway 108/120 and La Grange Road. There is no APN assigned to Property 2.

1.4 Project Personnel

All Dudek staff who contributed to this report meet the Secretary of the Interior’s Professional Qualification Standards for History or Architectural History.

Nicole Frank is an architectural historian with 3 years’ professional experience in the historic preservation field. Ms. Frank’s professional experience encompasses a variety of projects for local agencies, private developers, and homeowners in both highly urbanized and rural areas, including reconnaissance-level surveys, preparation of resource-appropriate and citywide historic contexts, and historical significance evaluations in consideration of the NRHP, CRHR, and local designation criteria. She has experience conducting historic research, writing landmark designations, performing conditions assessments, and working hands-on in building restoration projects throughout the United States. Ms. Frank also has governmental experience with the City of San Francisco’s Planning Department and the City of Chicago’s Landmark Designations Department.

Sarah Corder is a senior architectural historian with more than 15 years’ professional experience throughout the United States in all elements of cultural resources management, including project management, intensive-level field investigations, architectural history studies, and historical significance evaluations in consideration of the CRHR, the NRHP, and local-level evaluation criteria. Ms. Corder has conducted numerous historical resource evaluations and developed detailed historic context statements for a multitude of property types and architectural styles, including private residential, commercial, industrial, educational, and agricultural properties. She has also provided expertise on numerous projects requiring conformance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties.

Fallin Steffen is an architectural historian with 4 years’ experience in historic preservation, architectural conservation, and cultural resource management in the Monterey Bay Area and Northern California. Ms. Steffen’s professional experience encompasses a variety of projects for local agencies, private developers, and homeowners in both highly urbanized and rural areas, including reconnaissance- and intensive-level surveys, preparation of resource-appropriate and city-wide historic contexts, and historical significance evaluations in consideration of the NRHP, CRHR, and local designation criteria. Ms. Steffen meets the Secretary of the Interior’s Professional Qualification Standards for Architectural History. She is experienced with interdisciplinary projects spanning private and public development, transportation, and water infrastructure, and maintains experience forming educational sessions about the identification of and best practices for the preservation of historic resources.

Kathryn Haley is a senior architectural historian with 18 years’ professional experience in historic/cultural resource management. Ms. Haley has worked on a wide variety of projects involving historic research, field inventory, and site assessment conducted for compliance with Section 106, National Environmental Policy Act, and CEQA. Ms. Haley specializes in CRHR and NRHP, evaluations of built environment resources including water management structures (levees, canals, dams, ditches), buildings (residential, industrial, and commercial), and linear resources

(railroad alignments, roads, and bridges). She specializes in managing large-scale surveys of built environment resources including historic district evaluations. She has prepared numerous historic resources evaluation reports and historic property survey reports for the California Department of Transportation. Ms. Haley also worked on the California High-Speed Rail, San Jose to Merced, and Central Valley Wye Project Sections, leading the built environment survey, conducting property specific research, preparing the Draft Historic Architectural Survey Report, and co-authoring the environmental section for Cultural Resources. Ms. Haley has also assisted in preparation of historic properties inspection reports (condition assessments) under the direction of the Naval Facilities Engineering Command in accordance with Section 106 and Section 110 of the NHPA. Moreover, Ms. Haley has served as project manager, coordinator, historian, and researcher for a wide variety of project. She is also experienced in the preparation for NRHR nominations, as well as Historic American Building Survey, Historic American Engineering Record, and Historic American Landscape Survey documents.

2 Background Research

2.1 CHRIS Records Search

Staff at the CCalC performed a records search for the API and a 1-mile buffer surrounding the API on December 10, 2020. A comprehensive records search is presented in and appended to the *Cultural Resources Inventory Report for the SPI Keystone Project, Tuolumne County, California – Negative Findings* report prepared by Dudek in 2021. Results of the cultural resources records search indicated that 11 previous cultural resources studies have been conducted within 1 mile of the Project area between 1979 and 2019. Of these, one study intersects a portion of the API. CCalC records indicate that a total of four previously recorded cultural resources fall within 1 mile of the Project area. The full records search summary can be found in Giacinto and Owen 2021. One of the previously documented built environment resource, the Sierra Railroad – Mainline, Keystone Segment (P-55-000347) came back in the records search results and described below.

P-55-000347

P-55-000347 has been recommended for the NRHP as part of the Sierra Railroad Historic District. However, it is unclear if the property was ever formally listed. The Sierra Railroad – Mainline and its components including Sierra Road, Paulsell Station, Cooperstown Road, Keystone, Chinese Station/Montezuma, Woods Creek, Sullivan Creek, Standard, Black Oak Road, and Ralphs Station were evaluated in 2008 by JRP Historical Consulting LLC. The Sierra Railroad – Mainline begins in Oakdale (Stanislaus County) on the south side of East H Street, between South Sierra and South Yosemite Avenues, and follows a generally easterly route into Tuolumne County passing through communities of Jamestown, Sonora, and Standard before terminating in Tuolumne City. Currently the status is listed as, “Eligible (3D) Appears eligible for listing in the National Register as a contributor to a district that has been fully documented according to OHP [Office of Historic Preservation] instructions and appears eligible for listing.”

2.2 Built Environment Resource Directory

The Built Environment Resource Directory (BERD) files provide information, organized by county, regarding non-archaeological resources in the Office of Historic Preservation’s (OHP) inventory. The OHP inventory contains information only for built environment resources that have been processed through the office. This includes resources reviewed for eligibility for the NRHP and the California Historical Landmarks programs through federal and state environmental compliance laws, and resources nominated under federal and state registration programs. The BERD replaces the former Historic Properties Directory that previously provided evaluation status information for resources processed through the OHP.

Dudek accessed the Tuolumne County BERD from the OHP on January 13, 2021, and identified no resources that overlapped the Project API and no resources adjacent to the Project API within 1 mile. The Sierra Railroad – Tuolumne Line (P-55-000347) was found in the BERD without an address other than Tuolumne, Tuolumne County, and was given a 3S status code on December 23, 1988.

2.3 Building Development and Archival Research

Tuolumne County Historical Society

Dudek staff contacted the Tuolumne County Historical Society on January 13, 2021, and requested to review information related to the Sierra Railroad of California and Sierra Pacific Industries. The Historical Society sent back images of a 1904 plat map of the Project area (Tuolumne County Historical Society 1904) and advised that there were no available aerial images of the area.

Tuolumne County Library

Dudek staff contacted the Tuolumne County Library on January 14, 2021, and requested to review information related to the Sierra Railroad of California and Sierra Pacific Industries. The Library has yet to respond to this request.

California State Railroad Museum Library

Dudek staff reviewed the digital California State Railroad Museum Library Guide to the Sierra Railway / Sierra Railroad Collection, 1886–1988 for information related to the Project area and the Sierra Railroad in Tuolumne County (California State Railroad Museum Library 2001). The reviewed materials were used in the preparation of Chapter 3, Historic Context, of this report.

Tuolumne County Public Works Request for Records

On January 11, 2021, Dudek staff contacted the County of Tuolumne Community Development Department in order to request historic building permits for the four APNs within the API. In March 2021, the County provided copies of all available building permits for the four APNs within the API for the subject property for new construction, demolition, alteration, and additions. These documents were valuable in establishing a history of alterations to the properties within the API (see Section 5 Description and Significance Evaluation). Permits were available for one of the four properties within the API—12015 La Grange Road, Jamestown, California 95327 (APN: 063-190-051-000)— and for two adjacent APNs 063-190-052-000 and 063-190-020-000.

APN 063-190-051 permits are as follows:

- 1969: Roof for lumber sorter (existing) (Permit no. 46310)
- 1984: Main service upgrade 200 3 phases (Permit no. C-35001)
- 1989: Construct a lunchroom (Permit no. C-43709)
- 1990: Allow construction of a bark processing plant (Permit no. 307)
- 1990: Electric service approval (Permit no. C-46432)
- 1990: Construction of overhead storage bins (Permit no. C-47028)
- 1990: Constriction of a guard shack (Permit no. C-47029)
- 1990: Construction of retaining walls (Permit no. C-47027)
- 1992: Electric service approval (Permit no. 92982)
- 2008: Electric service approval (Permit no.C-47029)

- 2008: Interior remodel of shaving mill facility (Permit no. SRE08-012)
- 2009: Tenant improvement (Permit no. B2008-00904)
- 2011: Relocate shaving drying equipment to the exterior of the northeast and northwest sides of the building (Permit no. SRE 11-018)
- 2011: Remove equipment from exterior (Permit no. B2009-00904)
- 2013: Install new water tank and pad for plant (Permit no. B2013-00732)
- 2015: Replaced 400-watt HPS with 78-watt LED floods (Permit no. B205-00456)

APN 063-190-052 permits are as follows:

- 2004: Replacement of electrical meter for parcel and conduit (Permit no. E2004-00010)
- 2015: Installation of a fire lane and fire hydrant and slab, electrical service, and booster pump (Permit no. B2015-00034)
- 2015: Pad for pumphouse and water line (Permit no. B2015-00034)

APN 063-190-020 permits are as follows:

- 1992: Install a 12 x 12-foot concrete slab (Permit no. 92000597)
- 1994: Install AGRI meter at pole for well service (Permit no. C-33060)

Historical Newspaper Review

Dudek reviewed historical newspaper from Tuolumne County in an effort to understand the development of SPI and the Project area. These documents were used in the preparation of Section 3, Historic Context, of this report.

Historical Sanborn Map Review

A review of historical Sanborn Map Company fire insurance maps covering Tuolumne County, La Grange, and Jamestown was conducted as part of the archival research effort for the Proposed Project from the following years: 1898, 1905, 1908, 1910, 1914, 1929, and 1941. Unfortunately, the subject property does not fall within the mapped area of the County and census-designated places.

Historical Map Review

A review of historical plat and subdivision maps was conducted as part of the archival research effort for the proposed project from the following years: 1904 and 2015 (Tuolumne County Public Works 2015; Tuolumne County 2015; Tuolumne County Historical Society 1904).

Historical Aerial Photographs

A review of historical aerial photographs was conducted as part of the archival research effort for the proposed project from the following years: 1945, 1959, 1987, 1988, 1998, 2005, 2009, 2010, 2012, 2014, and 2016 (NETR 2021; UCSB 2021). Aerials of the Project area were largely unavailable. Dudek attempted to consult additional aerials through contacting local repositories such as the Tuolumne County Historical Society and California State Railroad Museum, but no additional aerials of the Project area were available.

Table 1 lists the historical aerial photos reviewed for this report.

Table 1. Historical Aerial Photograph Review

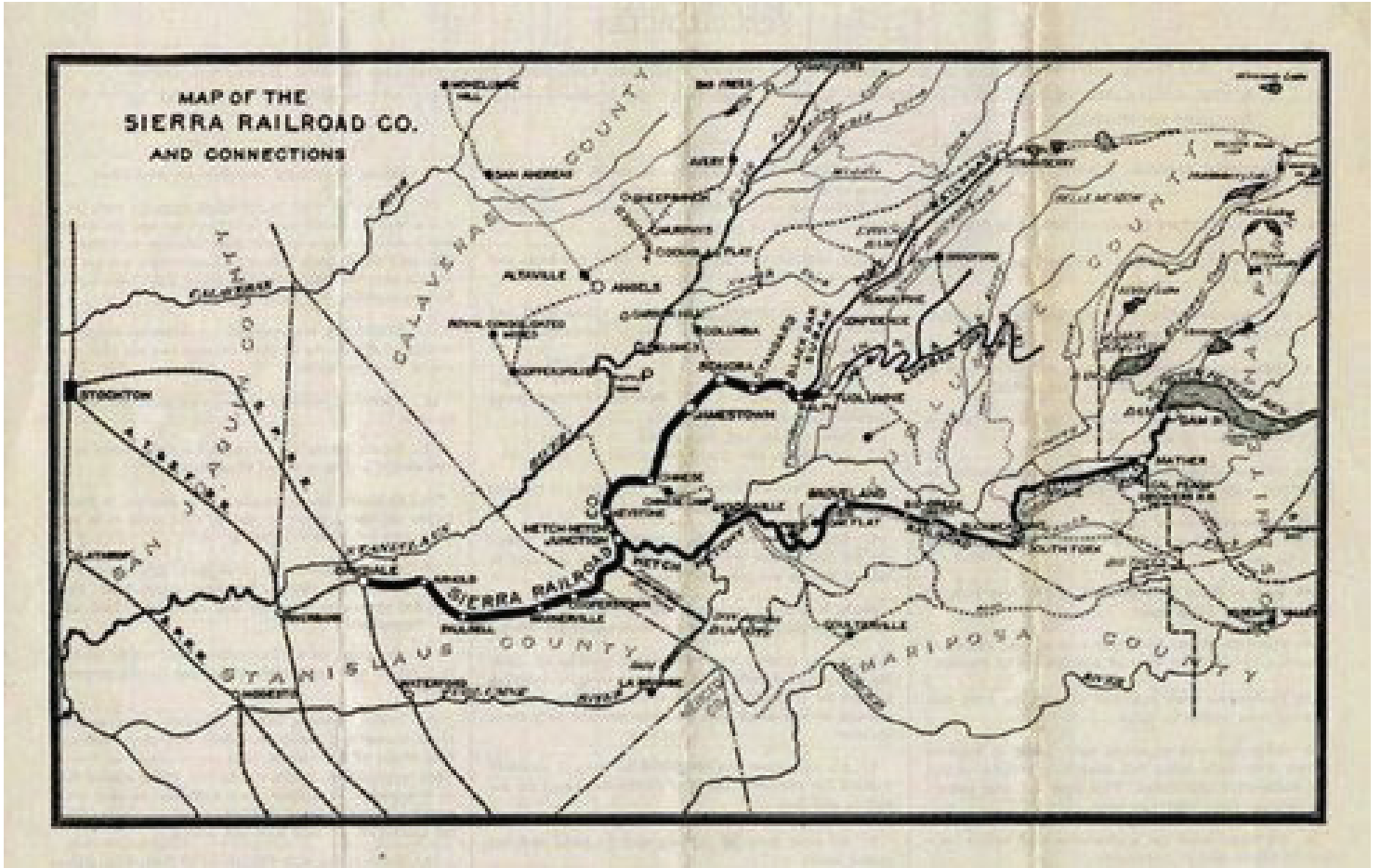
Year	Observations and Findings
1945	The 1945 aerial displays the proposed Project area as undeveloped with the surrounding land open. To the direct west of the Project area are train tracks for the California Sierra Railroad and La Grange Road.
1959	The 1959 image displays little discernable changes to the Project area. South of the proposed Project area displays an increase in development with the construction of three homesteads along La Grange Road.
1987	The 1987 aerial displays the largest change to the Project area with its development as an industrial property, including the construction of approximately eight industrial buildings on the western side of the lot along La Grange Road. The eastern and northeastern sections of the property display large piles of material accessed by an informal road from the west. The northern end of the property displays the construction of two residential properties, but the aerial is of too poor quality to identify the number of buildings and their features. Surrounding the property there is an increase in development including the construction of CA-108 and several other residences to the southeast. To the north of the industrial property is a small improved spring with a dam.
1988	The 1988 image displays several changes to the Project area with the demolition of the majority of the original industrial buildings and replacement with three others. The only remaining buildings are located at the far southwestern end of the property. Due to poor image quality, alterations to the other buildings on the property could not be identified.
1998	The 1998 aerial displays a division between the western and eastern sections of the property. The western section contains four buildings. The eastern section is accessed from La Grange Road and displays five industrial buildings and a group of concrete-lined storage bays to the south. To the northeast is a rectangular-in-plan building. Surrounding the property is a slight increase in development to the southeast.
2005	The 2005 image displays little discernable changes from the 1998 image. The largest change is seen in the demolition of the northeast rectangular-in-plan building
2009-2010	No discernable changes.
2012	The 2012 aerial displays an increase in the number of buildings at the western end of the property with the construction of three additional buildings. The rest of the property remains relatively similar to the 2005 image.
2014	The 2014 image shows an increase in the number of buildings at the western end of the property with the construction of five buildings. The rest of the property and surrounding area display no discernable changes.
2016	The 2016 aerial displays an increase in the number of buildings at the western end of the property with the construction of six buildings. The rest of the property and surrounding area display no discernable changes.

Sources: NETR 2021; UCSB 2021.

2.4 Interested Party Correspondence

On July 5, 2023, Dudek Architectural Historians Erin Jones and Kathryn Haley sent outreach letters and figures depicting the Project area to Taryn Vanderpan, an Administrative Assistant with the Tuolumne County Planning Division, and the Tuolumne County Historical Society and Museum. The letter provided a brief description of the proposed Project and requested information about historic and cultural components in or near the Project area. To date, no responses have been received. Copies of all the interested party correspondence in conjunction with this Project are located in Appendix A.

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3 Historic Context

The following historic context addresses relevant themes concerning the history of the subject properties. It begins with an overview the development of Central California and Tuolumne County and concludes with a discussion of the historical development of the properties within the API.

3.1 Historical Overview of Tuolumne County

3.1.1 Spanish Period (1769–1822)

European exploration into Central California and what would later become Tuolumne County began in 1602 with a Spanish envoy mission into Monterey Bay by Sebastián Vizcaíno. The purpose of the voyage was to survey the California coastline to locate feasible ports for shipping, and Vizcaíno had explicit instructions prohibiting the creation of settlements and interacting with local Native Americans. Finding the bay to be commodious, fertile, and extremely favorable for anchorage during eastward voyages from Manila to Acapulco, Vizcaíno named the Bay “Monterey” after the Conde de Monterey, the present Viceroy in Mexico (Chapman 1920; Hoover et al. 2002).

Despite being mapped as an advantageous berth for Spanish shipping efforts, the epicenter of Spanish settlement in Alta California did not make its way to the Monterey Bay until the second half of the eighteenth century. In an effort to prevent the establishment of English and Russian colonies in northern Alta California, Don Gaspar de Portolá, the Governor of Baja, embarked on a voyage in 1769 to establish military and religious control over the area. This overland expedition by Portolá marks the beginning of California’s Historic period, occurring just after King Carlos III of Spain installed the Franciscan Order to direct religious colonization in assigned territories of the Americas. With a band of 64 soldiers, missionaries, Baja (lower) California Native Americans, and Mexican civilians, Portolá established the Presidio of San Diego, a fortified military outpost, as the first Spanish settlement in Alta California. In July of 1769, Padre-Presidente Franciscan Fr. Junípero Serra, founded Mission San Diego de Alcalá at Presidio Hill, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823, including Mission Santa Cruz (Hoover et al. 2002: 226; Lehmann 2000; Koch 1973).

In 1777, San José became the first pueblo or town settlement in Spanish California, located on the eastern bank of the Guadalupe River and the closest mission to Tuolumne County. The pueblo was given its official name in 1778 of El Pueblo de San José de Guadalupe. The Guadalupe River acted as the natural boundary between the lands controlled by the mission and the pueblo. There was tension between the people that occupied the mission and those that lived in the nearby pueblo over land and water rights in the surrounding area. This tension was subsided when on the orders of Father Magin de Catalá a road was built by Native Americans to link the mission with the pueblo named the Alameda (Laffey 1992; A and A 2011).

The pueblo located at San José’s primary function was to supplement the crops grown in the missions to support other granaries in Monterey and San Francisco. Although the settlement, which was originally located near the Guadalupe River, was subject to severe winter flooding and the site of the pueblo was moved approximately one mile south to higher ground in 1791. The center of the final pueblo site was the current site of Market Street Plaza. One of the first actions taken towards permanent settlement was the building of a dam above the settlement that collected water for distribution throughout the town. Homes at this time were small adobe structures, which were clustered around the water irrigation system, the market square, and the crossing of the roads to Monterey, the Santa Clara Mission, and the embarcadero at Alviso (Laffey 1992; A and A 2011).

The area remained agriculturally based with early colonists planting corn, beans, wheat, hemp and flax and in addition to setting out small vineyards and orchards. A portion of the crops were taxed for the support of the local presidios and their soldiers, while others were traded in Monterey for manufactured goods imported from Spain and Mexico. In 1810, a civil war had erupted in Mexico and as a result California was cut off from Mexico and all of its trade. Within the next decade, the Santa Clara Valley economy began to lag due to changing administrative policies of the newly established Mexican government. With rising tensions to the south, the control the Spanish Crown possessed over the Santa Clara Valley soon began to be challenged (Laffey 1992; Butler 2002).

3.1.2 Mexican Period (1822–1848)

After more than a decade of intermittent rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants. In addition to eliminating the system of Spanish nobility in California, the Spanish Missions across the territory were secularized during this period. The secularization of the Missions meant that all communal mission property was placed in a trust with the intention of being returned to the local Native American population. Extensive land grants were established in the interior during this period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated colonization efforts (Koch 1973; Lehmann 2000).

Tuolumne County remained relatively cut-off from the secularization and colonization occurring in the coastal cities of San Jose and Monterey. Few accounts of the County from pre-1848 survive rather the area was a significant residential and resource procurement area for the Central Sierra Me-Wuk. The County's indigenous peoples, the Central Sierra Me-Wuks, arrived between 2,000 and 600 years ago and pre-1848 it was estimated that there were 35 villages in this part of the Sierra Nevada (Tuolumne County 2015; Marvin and Brejla 2010).

3.1.3 American Period (1848–Present)

The Mexican American War ended with the Treaty of Guadalupe Hidalgo in 1848, ushering California into its American Period. Santa Cruz was designated as 1 of the 27 original counties of California on February 18, 1850, shortly before California officially became a state with the Compromise of 1850. The new state of California recognized the ownership of lands in the state distributed under the Mexican Land Grants of the previous several decades (Lehman 2000; Koch 1973).

In Tuolumne County, historic activity began soon after the widely publicized discovery of gold in 1848. By the Gold Rush period (1848–1855), the Central Sierra Me-Wuk's territory had been intruded on several times and the number of tribes reduced. The settlement patterns established over thousands of years were altered due to high mortality rates and the encroachment of white settlers on the land. Villages were either abandoned or had their inhabitants forcibly removed, leading to the consolidation of many villages over time. After the discovering of gold in the area by either Benjamin F. Wood in Jamestown or on Mormon Creek by a group of Mormons, miners invaded the region. In Columbia, a shanty town that started with several miners grew to a community of several thousand with more than 500 buildings and over 150 businesses. The Gold Rush came and went quickly due to the depletion of gold fields and six major fires between 1854 and 1866. By the mid-1860s the mining industry in the County leveled off and many families moved to other settlements resulting in the County's population decreasing by nearly 50% between 1860 and 1870 (Tuolumne County 2015).

Starting in the late 1880s, mining technology advanced and there was an infusion of foreign capital into the County allowing for a second Gold Rush. Jamestown remained a trade and supply depot for mining higher in the foothills and became the prime location on the roads from the Central Valley. After mining developed as a profitable venture again, a large increase in assessed valuation allowed the County to construct new public services. Agriculture and livestock raising including cattle ranches became dominant local industries. This resulted in the construction of many homes, a population increase, and whole communities being established and enlarged. Along with mining and agriculture, the timber industry emerged as a dominant force in the County as a response to the need for timbers to support the mines, build stamp mills, and construct buildings. The timber industry provided the momentum needed to develop the Sierra, Sugar Pine, West Side, and Cherry Valley railways. By 1900, the railroad industry for logging, passenger, and freight services generated more economic opportunities for the area. The Sierra Railroad, incorporated in 1897, extended from Oakdale to Tuolumne and hauled a variety of things including lumber, ore, passengers, agricultural products, and livestock (Figure 3). The railroad's principal investors included Thomas S. Bullock, a New York capitalist and William Crocker, a San Francisco banker and treasurer of the California Exploration Company. The Sierra Railroad between 1893 and 1920 was closely associated with the quartz mining era in California that peaked in Tuolumne County during this time (Tuolumne County 2015; Tuolumne County Historical Society 2021a, 2021b, 2021c).

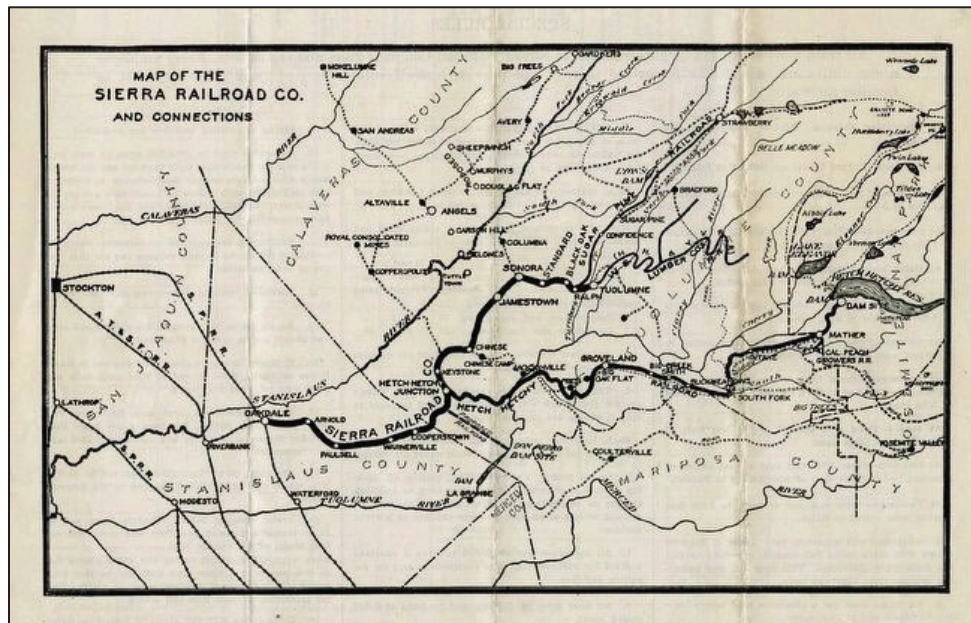


Figure 3. Map of the Sierra Railroad Co. and Connections Timetable, May 9, 1948 (Historical Marker Database 2016)

The presence of the Sierra Railroad allowed large mills to develop to cut lumber for local use and exportation. The West Side Flume and Lumber Company, later renamed the West Side Lumber Company, reincorporated in 1899, and the Standard Lumber Company, incorporated in 1901, were the County's two largest lumber operations opening planning mills and box factories. The West Side Lumber Company's mill amongst others, furnished the largest source of revenue for the Sierra Railroad with the two industries being codependent on each other for success. The Sierra Railroad had connections to the Santa Fe and Southern Pacific railroads in Oakdale allowing it to be part of the national rail network. Tourism to the area increased as a result of the railroad, allowing for the construction of vacation homes in the hills east of Sonora in the 1920s. The railroad reached its height of activity

just prior to World War I when it was used to transport materials for building the City of San Francisco's O'Shaughnessy Dam in Hetch Hetchy Valley in 1923 and storage reservoirs for local irrigation districts formed behind the Don Pedro Dam in 1923 and Melones Dam in 1926 (Tuolumne County 2015; Tuolumne County Historical Society 2021b, 2021c).

By World War I, the mines once again became inactive with many people moving to the San Francisco Bay Area to work in war-related industries. Automobiles and improved roads changed the balance of imports and exports in the agricultural industry, with less products produced locally and more imported. The Great Depression in 1929 affected the local agricultural and timber industries with a small mining boom in the mid-1930s due to the increased price of gold and low operation costs. The start of World War II put a stop to the mining industry in the area with the federal government ordering all mines to close in 1942. The Sierra Railroad - Mainline was reconstructed with heavier rail to accommodate the postwar housing booms demand of forest and mineral products. During the 1940s into the 1950s, the railroad was kept afloat by transporting freight and operating its steam-era roundhouse in Jamestown for tourists, railroad enthusiasts, and movie producers. Despite switching from steam to diesel locomotives in 1955 the public's interest in the older railcars remained. In 1971, Railtown 1897 opened in Jamestown and was acquired by the Department of Parks and Recreation as a State Historic Park in 1982 (Railtown 1897 2021). Tuolumne County experienced several decades of growth between 1970 and 1990 with the population increasing from 22,169 to 48,456. Despite the increase in population the lumber industry in Northern California has been on a steady decline since the 1980s, with 119 lumber mills present in 1987 decreasing to 59 by 1999. By 2000, the population leveled off with the County retaining its tight knit reputation established early in its history (Railtown 1897 2021; Tuolumne County 2015, 2002).

The Sierra Railroad - Mainline was evaluated in 2008 by JRP Historical Consulting LLC and found to meet the criteria for listing in the NRHP and CRHR under Criterion A (1) as a contributor to the existing Sierra Railroad Historic District. For a detailed history of the Sierra Railroad, see the 2008 report titled *Second Addendum to Cultural Resources Inventory Report for the Yosemite Ranch Golf and Wetland Preserve Project at Yosemite Junction, Tuolumne County, California*, written by Laura Leach-Palm (Leach-Palm 2008).

3.2 History of the API

The area that encompasses the API, known as Keystone, began development in 1898 when the Sierra Railroad rerouted away from its original mainline from Don Pedro to go around the Keystone Area. The new route was chosen to avoid boxcar buildups created by a lack of siding trackage built to allow some train cars or boxcars to move off the side, while others stayed on the track. This new line ran parallel to the original mainline and offered both passenger and freight travel. By the 1920s, Sierra's mainline stations Arnold, Paulsell, Keystone, and Black Oak were retired as passenger stops (California State Railroad Museum Library 2001).

Between the 1920s and the early 1960s, Property 1 remained undeveloped with the Sierra Railroad (Property 2) running along the property's western boundary. In 1963, Sequoia Pine Mills Inc. a subsidiary of Great Western Lumber Company of Downey began developing the 50-acre site on La Grange Road just off Highway 108 as a lumbermill. The company's total investment in the development of the property was \$750,000 including the construction of a temporary office (Oakland Leader 1963). The company maintained their headquarters and lumber manufacturing facilities at Keystone until 1969 when the Fibreboard Corporation acquired Sequoia Pine Mills, Inc. for shares of common stock (Oakland Tribune 1969). Throughout the 1960s, Fibreboard purchased many of the

lumber mills in Tuolumne County and had a large presence in the area. By 1969, two single-family Ranch style residences had been constructed in the northwest corner of the property located at 12055 and 12051 La Grange Road. These two residences were likely used to as housing for managers and workers at the Keystone mill. Also, in 1969 the company sponsored the first passenger train on the Sierra line since 1963 on a trip from Jamestown to Sonora (Larson 2008).

The Fibreboard Corporation had their headquarters in Walnut Creek, California, and besides wood products, the corporation had interests in synthetic building materials, industrial insulation, and ski resorts. In October 1990, a permit was issued to allow the construction of a bark processing plant at Keystone. The Keystone plant operated as a typical bark processing plant, which generates decorative bark and mulch products for landscaping from conifers processed through a sawmill. By the mid-1990s, the company owned two sawmills, plywood plant, and a bark plant in Standard, Chinese Camp, and Keystone. Fibreboard at the time was the largest private employer in Tuolumne County. Despite the business's success, the industry's survival was threatened by environmental restrictions and bureaucratic bottlenecks in the U.S. Forest Service. Timber profits decreased by 1995 with \$12.7 million compared to \$18.5 million the year before. The company's stock jumped 28% in June 1995 after the announcement that it was "exploring the possible sale" of its Wood Products division based in Tuolumne County, including its mill at Keystone (DeLacy 1995).

In 1994, Fibreboard's Keystone property was subdivided creating a separate parcel for its bark processing plant. This plant is currently occupied by American Wood Fibers at 12015 La Grange Road and operates as a producer of specialty forestry products including large and small animal bedding, wood shavings, industrial wood flour, premium wood pellet products, firewood, soil and compost. Throughout the 1990s, the property had multiple buildings constructed on site to facilitate the plant's production including a warehouse, storage buildings, offices, and garages (AWF 2021; NETR 2021).

By 1995, the company sold its Wood Products Group to SPI, the deal included 76,000 acres of timberland and all of the operating facilities at Standard, Chinese Camp, and Keystone in Tuolumne County and Red Bluff in Tehama County for \$245 million. Keystone continued to be used as a bark processing plant by SPI as the only decorative bark plant owned the company at the time. SPI maintained ownership of the mills at Standard, Chinese Camp, and Keystone and continued to thrive due to owning trees on 1.5 million privately owned acres throughout California. In 2011, 2 years after closing its Standard mill because of tight lumber supply and weak demand, the 91-year old mill reopened as a sawmill employing 110 people. In Tuolumne County, SPI employed 256 people, including 122 at the cedar fencing plant near Chinese Camp and 24 people at the Keystone landscaping bark plant. In 2014, SPI's Keystone parcel was subdivided again with the division of two single-family residential parcels from the main parcel along La Grange Road. Keystone remained as SPI's only bark plant until 2020, when the company opened the Lincoln Bark Plant in Lincoln California and Sonora Bark Plant in Sonora, California. In October 2020, the Keystone facility was purchased from SPI by the Golden State Natural Resources Corporation as a biomass site intended to produce wood pellets, and then ship the products overseas to Asian markets where the demand is high. The property no longer operates as a bark processing plant, and by 2021 all facilities on the site had been abandoned (Jardine 1999; DeLacy 1995; Draffan 2006; Handen 2020).

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4 Field Survey

4.1 Methods

Dudek Architectural Historian Fallin Steffen, MPS, conducted pedestrian survey of the Project area for historic built environment resources on January 13, 2021. The survey entailed walking the exteriors of all buildings and structures within the Project area, documenting each building with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the property. Dudek documented the fieldwork using field notes, digital photography, close-scale field maps, and aerial photographs. Photographs of the subject property were taken with a digital camera. All field notes, photographs, and records related to the current study are on file at Dudek’s office in Sacramento, California.

4.2 Results

During the course of the pedestrian survey, Dudek documented information needed to formally evaluate Property 1 and Property 2 for NRHP, CRHR, and Tuolumne County eligibility. Section 5 (Description and Significance Evaluation) of this report provides a detailed physical description of the properties and the results of the significance evaluation under all NRHP, CRHR, and Tuolumne County designation criteria and integrity considerations. Dudek has compiled the appropriate DPR 523 series forms in conjunction with this report that reflects the significance evaluation of the structure. The complete DPR 523 series forms are included in this report in Appendix B.

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5 Description and Significance Evaluation

In order to assess Property 1 and Property 2 historical significance and integrity, the properties were recorded and evaluated in consideration of NRHP, CRHR, and Tuolumne County designation criteria and integrity requirements. A physical description of each property and its development history is provided below. The property significance evaluations were prepared by Dudek Architectural Historian Nicole Frank, MSHP, who meets the Secretary of the Interior’s Professional Qualification Standards for architectural history. The complete DPR 523 form sets are located in Appendix A.

5.1 Property 1, SPI Keystone Mill and Support Facilities

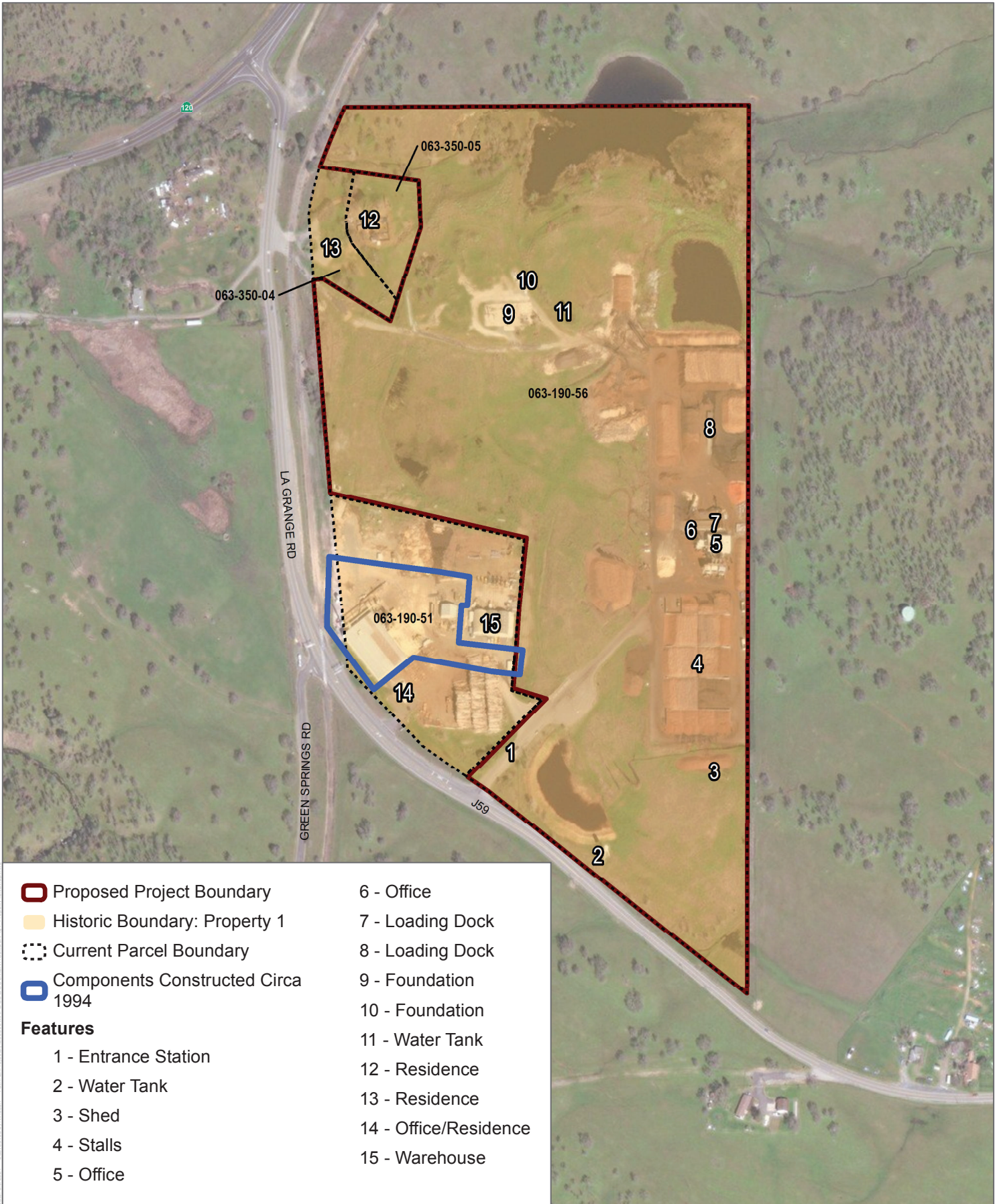
Property Description

The Project area is currently comprised of the abandoned SPI Keystone mill and support facilities located on APN 063-190-056 that is 58.56 acres. Historically, the mill was a much larger property that is defined for the purposes of this study as Property 1 (see Figure 4) and includes the following APNs:

- APN 063-190-056, abandoned SPI Keystone Mill located at 12001 La Grange Road
- APN 063-350-004, residence located at 12051 La Grange Road
- APN 063-350-005, residence located at 12055 La Grange Road
- APN 063-190-051, American Wood Fibers located at 12015 La Grange Road

The property includes 15 components including 8 buildings, 5 structures, and 2 foundations. Surrounding the property is a chain-link fence with additional chain-link fences around the two residential buildings and American Wood Fibers. The abandoned SPI Keystone mill has two access points from La Grange Road, including southwest access by a paved driveway and northwest access by paved road. The two residences and American Wood Fibers are located directly off La Grange Road. Around Component 9, Foundation, is a partially paved truck turnaround. To the north of the abandoned SPI Keystone mill buildings are two improved springs with concrete footings for a sluice dam. Open grass spaces are located to the south, west, and northwest of the abandoned SPI Keystone mill. South of the American Wood Fibers buildings is an area of log storage. Figure 4, Property 1 Site Map, identifies the location of the buildings and structures within the Project area and their functions.

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SOURCE: Bing Maps (Accessed 2021), Tuolumne County 2020



FIGURE 4
Property 1 Site Map
SPI Keystone Project

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Component 1, Entrance Station

Component 1, Entrance Station, is one-story and rectangular in plan building with a front facing gable roof on a concrete foundation constructed circa 1969. The building's exterior walls are clad in vertical composition board with the roof sheathed in rolled composition roofing. The building's main (northeast) elevation is accessed by a set of two concrete steps. Fenestration includes metal horizontal sliding windows and a half-glass composition entry door. Observed alterations include changes in fenestration openings and removal of rain gutters (Exhibit 1).



Exhibit 1. Component 1, Entrance Station, northeast elevation, view to southwest (Dudek image DSCN7793).

Component 2, Water Tank

Component 2, Water Tank, is a multicolumn metal water storage tank that rises approximately 100 feet from the ground, constructed circa 1969 (Exhibit 2).



Exhibit 2. Component 2, Water Tank, view to north (Dudek image DSCN7805).

Component 3, Shed

Component 3, Shed, is one-story and square-in-plan building with a front facing gable roof constructed circa 1969. The building's exterior walls are clad in composition wood with the roof sheathed in corrugated metal sheltering a water supply well. The building's southeast elevation is open (Exhibit 3).



Exhibit 3. Component 3, Shed, view to northwest (Dudek image DSCN8042).

Component 4, Stalls

Component 4, Stalls, are constructed of concrete masonry units rising approximately 20 feet high, constructed circa 1969. The northern and the southern ends display four smaller stalls with three larger stalls on the western and eastern ends (Exhibit 4).



Exhibit 4. Component 4, Stalls, view to southeast (Dudek image DSCN7837).

Component 5, Office

Component 5, Office, is a two-story rectangular-in-plan building with a low-pitched front gable roof, constructed circa 1969. The exterior walls are clad in metal panels with the roof sheathed in rolled composition roofing. The main (west) elevation displays a large rectangular opening. Fenestration includes metal horizontal sliding windows and metal entry doors. To the south and west of the office building are attached machinery for the creation of decorative landscaping bark. This machinery includes a standard chip screen, bark hog shredder, conveyer belts, elevators, and storage silos. Observed alterations include changes in fenestration openings (Exhibit 5).



Exhibit 5. Component 5, Office, west elevation, view to east (Dudek image DSCN7923).

Component 6, Office

Component 6, Office, is rectangular-in-plan building with a flat roof, constructed circa 1969. The exterior walls are clad in horizontal metal paneling with a flat roof sheathed in corrugated metal. Fenestration includes metal horizontal sliding windows and a half-glass metal entry door. Observed alterations include the removal of original fenestration (Exhibit 6).



Exhibit 6. Component 6, Office, south and east elevations, view to northwest (Dudek image DSCN7932).

Component 7, Loading Dock

Component 7, Loading Dock, displays as rectangular in plan running west to east and constructed circa 1969. The structure is constructed out of concrete with an incline leading to a metal storage container on the eastern end (Exhibit 7).



Exhibit 7. Component 7, Loading Dock, view to northeast (Dudek image DSCN7926).

Component 8, Loading Dock

Component 8, Loading Dock, displays as rectangular in plan running north to south and constructed circa 1969. The structure is constructed out of concrete with an incline leading to a truck pull up on the northern end (Exhibit 8).



Exhibit 8. Component 8, Loading Dock, view to northwest (Dudek image DSCN7968).

Component 9, Foundation

Component 9, Foundation, is constructed of concrete and was likely the site of a large rectangular in plan industrial building constructed circa 1969. A review of historic aerials shows that the building was demolished prior to 1987 (Exhibit 9).



Exhibit 9. Component 9, Foundation, view to west (Dudek image DSCN8012).

Component 10, Foundation

Component 10, Foundation, is constructed of concrete and was likely the site of a rectangular-in-plan industrial building, constructed circa 1969. A review of historic aerials shows that the building was demolished prior to 1987 (Exhibit 10).



Exhibit 10. Component 10, Foundation, view to east (Dudek image DSCN8005).

Component 11, Water Tank

Component 11, Water Tank, is a multicolumn metal water storage tank on a wooden platform that rises approximately 100 feet from the ground, constructed circa 1969 (Exhibit 11).



Exhibit 11. Component 11, Water Tank, view to south (Dudek image DSCN8014).

Component 12, Residence

Component 12, Residence, is a one-story, irregular-in-plan, single-family residence with a side gable roof, constructed circa 1969. The building's exterior is clad in stucco with the roof sheathed in composition shingles. The main (north) elevation's fenestration includes a metal security door and horizontal sliding windows. On the southwest corner of the building is an attached side gable garage. The shed porch and interior carport display squared posts. Observed alterations include the addition of a security door, reroofing, and replacement windows (Exhibit 12).

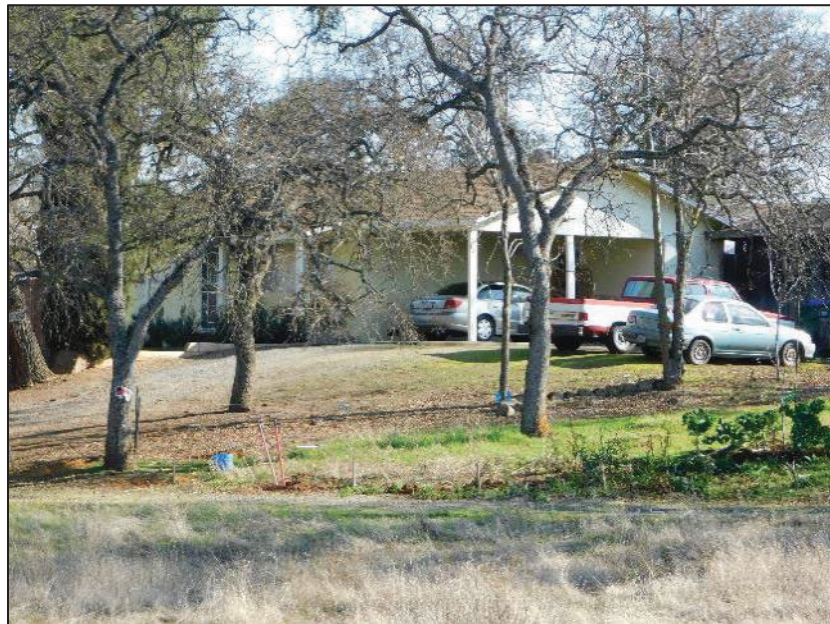


Exhibit 12. Component 12, Residence, north and west elevation, view to southeast (Dudek image DSCN8060).

Component 13, Residence

Component 13, Residence, is a one-story, rectangular-in-plan, single-family residence with a side gable roof, constructed circa 1969. The building's exterior is clad in vertical composition boards with the roof sheathed in composition shingles. An interior brick chimney is located offset to the right. The main (northwest) elevation's fenestration includes vinyl horizontal sliding windows and a composition entry door. The shed porch displays squared posts. Observed alterations include replacement windows and doors and reroofing (Exhibit 13).



Exhibit 13. Component 13, Residence, northwest elevation, view to south (Dudek image DSCN8069).

Component 14, Office/Residence

Component 14, Office/Residence, is a one-story, rectangular-in-plan, converted office with a side gable roof, constructed circa 1969. The building's exterior is clad in shingle and horizontal wood boards with the roof sheathed in metal paneling. The building's main (southwest) elevation displays a shed roof overhang supported by angled wooden posts. Fenestration includes vinyl horizontal sliding, fixed, and one-over-one windows and a half-glass composition entry door. Observed alterations include replacement windows and doors, reroofing, the addition of an overhang, and the conversion from a residence to an office (Exhibit 14).



Exhibit 14. Component 14, Office/Residence, southwest elevation, view to northeast (Dudek image DSCN8097).

Component 15, Warehouse

Component 15, Warehouse, is a two-story, rectangular-in-plan building constructed out of concrete masonry units circa 1969. The building displays a three-barrel roof sheathed in rolled composition roofing with a one-story shed roof addition on the east elevation clad in corrugated metal. Along the center of the three-barrel roofs are square vent openings. The main (south) elevation are three sets of double metal roller shutter garage doors and a single roller shutter garage door on the one-story addition. Fenestration includes corrugated metal entry doors, horizontal sliding windows, and composition doors. Observed alterations include additions to east and west elevations, replacement doors, and alteration of fenestration openings (Exhibit 15).



Exhibit 15. Component 15, Warehouse, south and east elevations, view to northwest (Dudek image DSCN8102).

Non-Historic Age Components

The property also features non-historic age components located on the current American Wood Fibers property (APN 063-190-051) that are shown in blue on Figure 4 (Property 1 Site Plan). These components were constructed after the historic age mill property was subdivided in the early 1990s and the current American Wood Fibers facility was established. According to historic aerial photography, it appears that these buildings are in place no later than 1994. These buildings include the following: production warehouse, storage buildings, offices, and garages (Exhibits 16 and 17).



Exhibit 16. Overview of American Wood Fibers property, view to west (Dudek image DSCN7992).

Exhibit 17. Overview of American Wood Fibers, view to north (Dudek image DSCN8095).

5.1.1 Identified Alterations

The following list of known alterations was compiled through archival research, a review of previous subject property documentation, and during the course of the pedestrian survey. Unless indicated, the date of these alterations is unknown:

- Demolition of two buildings (Pre-1987)
- Subdivision of parcel to allow construction of bark processing plant (1990)
- Subdivision of parcel to separate two single family residential parcels (2014)
- Replacement and removal of fenestration
- Alteration of fenestration openings
- Reroofing
- Addition of security doors

5.1.2 NRHP/CRHR Statement of Significance

In consideration of Property 1's lack of significant associations and compromised historical integrity, Property 1 is recommended not eligible for listing in the NRHP, CRHR, and County of Tuolumne Register of Cultural Resources under all criteria, based on the following significance evaluation.

NRHP Criterion A: associated with events that have made a significant contribution to the broad patterns of our history

CRHR Criterion 1: is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Archival research indicates that the development of the property began in 1898 with the construction of the adjacent Sierra Railroad Keystone stop. Between the 1920s and the early 1960s, the property remained undeveloped with the Sierra Railroad running along the property's western boundary. In 1963, Sequoia Pine Mills, Inc. a subsidiary of Great Western Lumber Company of Downey, began developing the 50-acre site as a lumbermill. The company maintained their headquarters and lumber manufacturing facilities at Keystone until 1969 when the Fibreboard Corporation acquired Sequoia Pine Mills, Inc. for shares of common stock and built the majority of the buildings on site, including two single-family ranch-style residences. Throughout the 1960s, Fibreboard purchased many of the lumber mills in Tuolumne County and had a large presence in the area. By the mid-1990s, the Fibreboard Corporation owned two sawmills, plywood plant, and a bark plant in Standard, Chinese Camp, and Keystone. In 1994, Fibreboard's Keystone property was subdivided, creating a separate parcel for its bark processing plant. In 1995, when the company sold its Wood Products Group to SPI, the deal included 76,000 acres of timberland and all of the operating facilities, including Keystone for \$245 million. Keystone continued to be used as a bark processing plant by SPI as the only decorative bark plant owned by the company at the time until 2020.

In Tuolumne County the timber industry emerged as a dominant force as a response to the need for timbers to support the mines, build stamp mills, and construct buildings in the late 1880s. The presence of the Sierra Railroad allowed large mills to develop to cut lumber for local use and export out of the County. By 1900, the railroad industry for logging, passenger, and freight services generated more economic opportunities for the area. The Sierra Railroad, incorporated in 1897, extended from Oakdale to Tuolumne and hauled a variety of things including lumber, ore, passengers, agricultural products, and livestock. The start of World War II put a stop to the mining industry in the area with the federal government ordering all mines to close in 1942. The Sierra Railroad – Mainline was reconstructed with heavier rail to accommodate the postwar housing boom's demand of forest and mineral products. Tuolumne County experienced several decades of growth between 1970 and 1990, with the population increasing from 22,169 to 48,456. Despite the increase in population, the lumber industry in Northern California has been on a steady decline since the 1980s, with 119 lumber mills present in 1987 decreasing to 59 by 1999.

Property 1, despite being one of the last functional bark processing plants in Tuolumne County in the 2000s, does not represent one of the first lumber processing plants in the County nor is it one of the few plants that are still in operation. Property 1 developed decades after the rise of the lumber industry in the County, with the majority of the buildings on the property constructed circa 1969 by the Fibreboard Corporation. Additionally, archival research failed to indicate that the Keystone Plant was the focus of the Fibreboard Corporation or SPI's lumber processing in the area. Throughout the 1960s, the Fibreboard Corporation also purchased a number of the lumber mills in Tuolumne County, and there is no indication that their Keystone Plant was unique among those acquisitions. During

SPI's ownership of the plant it was one of the smallest, employing only 24 people compared to the 122 at the cedar fencing plant near Chinese Camp. The plant operated as SPI's only bark processing plant between 1995 and 2020, but there is no indication that its existence made a significant contribution to the development of the County or the State for creating an innovate or unique method to process lumber.

Property 1 is not associated with any extraordinary event or events occurring within the context of the lumber processing industry nationally, at the state level, or locally in Tuolumne County that would distinguish it as significant. Moreover, research into the history of Property 1 revealed no evidence suggesting that the plant is associated with innovative bark processing techniques or a unique event or pattern of events considered historically significant. For these reasons, Property 1 does not appear eligible under NRHP Criterion A or CRHR Criterion 1.

NRHP Criterion B: associated with the lives of significant persons in our past.

CRHR Criterion 2: is associated with the lives of persons important in our past.

To be found eligible under Criterion B/2, the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research failed to indicate any such direct association between individuals that are known to be historic figures at the national, state, or local level and Property 1. The bark processing plant represents the collective efforts of many individuals, rather than the work of any single individual. Therefore, Property 1 is not known to have any historical associations with people important to the nation's or state's past. Due to a lack of identified significant associations with important persons in history, the plant does not appear eligible under NRHP Criterion B or CRHR Criterion 2.

NRHP Criterion 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.

CRHR Criterion 3: embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

The majority of the remaining buildings and structures within the Property 1 site are ubiquitous and prefabricated industrial buildings that are considered utilitarian, and do not represent a particular style of architecture. These are relatively common buildings that can be found at various industrial/manufacturing plants throughout the country. Furthermore, the buildings and structures are not known to be the work of an important architect, builder, engineer, or designer, and are not known to have been built using an innovative construction technique. Additionally, the two Ranch style single-family residences constructed as part of the site's development circa 1969 do not embody distinctive characteristics of a type, period, or method of construction. Multiple alterations to both buildings, including replacement windows and doors, addition of a security door, and reroofing, have affected their ability to display as 1960s era homes. Archival research failed to indicate the designer or architect of these buildings, and due to the ubiquitous style, they are unlikely to be the work of a master and do not possess high artistic value. Consequently, Property 1 does not appear eligible under NRHP Criterion C or CRHR Criterion 3.

NRHP Criterion D: have yielded, or may be likely to yield, information important in history or prehistory.

CRHR Criterion 4: has yielded, or may be likely to yield, information important in prehistory or history.

There is no evidence to indicate that the subject property is likely to yield any additional information important to prehistory or history beyond what is already known. The subject property is also not associated with an archaeological site or a known subsurface cultural component. Therefore, Property 1 does not appear eligible under NRHP/CRHR Criterion D/4.

5.1.3 Tuolumne County Statement of Significance

The County of Tuolumne County's criteria for designation of a cultural resource closely follow those criteria outlined for the NRHP and CRHR. Based on the above significance evaluations, and in consideration of Property 1's lack of significant associations, Property 1 is also recommended ineligible as a County of Tuolumne County cultural resource under any criteria.

1. Exemplifies or reflects significant elements of Tuolumne County's cultural, social, religious, economic, political, engineering or architectural history

As stated in NRHP/CRHR Criterion A/1, Property 1 is not associated with any extraordinary event or events within the context of the lumber processing industry in Tuolumne County that would distinguish it as significant. Moreover, research into the history of Property 1 revealed no evidence suggesting that the plant is associated with innovative bark processing techniques or a unique event or pattern of events considered historically significant. For these reasons, Property 1 does not appear to be directly associated with events that have made a significant contribution to the development of lumber processing in the County. Therefore, the plant does not appear eligible under County Criterion 1.

2. Identified with historic persons or with important local, state or national history

As stated in NRHP/CRHR Criterion B/2, archival research did not reveal an association between Property 1 and any persons who significantly contributed to the development of the county, state, or nation. Therefore, Property 1 does not appear eligible under County Criterion 2.

3. Embodies distinguished architectural characteristics valuable for study or a period style or method of construction or is a valuable example of the use of indigenous materials or workmanship

As discussed in NRHP/CRHR Criterion C/3, Property 1's buildings and structures are ubiquitous and prefabricated industrial buildings that are considered utilitarian, and do not represent a particular style of architecture. Additionally, the two Ranch style single-family residences constructed as part of the site's development circa 1969 do not embody distinctive characteristics of a type, period, or method of construction. Multiple alterations to both buildings including replacement windows and doors, addition of a security door, and reroofing have affected their ability to display as 1960s era homes. Therefore, Property 1 does not appear eligible under County Criterion 3.

4. Representative of a notable work of a master builder or architect

As discussed in NRHP/CRHR Criterion C/3, the buildings and structures at Property 1 are not known to be the work of a master builder or architect. Additionally, archival research failed to indicate the designer or architect of the two Ranch style single-family residences constructed on the property circa 1969. Therefore, the plant does not appear eligible under County Criterion 4.

5.1.4 Integrity Discussion

In addition to meeting one or more of the above criteria, an eligible resource must retain integrity, which is expressed in seven aspects: location, design, setting, materials, workmanship, feeling, and association. All properties change over the course of time. Consequently, it is not necessary for a property to retain all of its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. In order to retain historic integrity, “a property will always possess several, and usually most, of the aspects” (Andrus and Shrimpton 2002). The following sections discuss the integrity of Property 1.

Location: All of the extant buildings and structures are sited on their original locations of construction in their original orientation, and therefore retain integrity of location

Design: The subject property retains diminished integrity of design. The essential elements of plan, structure, and style have remained largely intact over time. Despite this, several of the conscious decisions made during the original conception and planning of the property as a site with one industrial plant has been altered due to two subdivisions affecting the essential element of space. Additionally, over time there has been a disruption in the original paths of circulation that makes it difficult to identify how the property was accessed during its original period of development. The demolition of certain buildings has also made it hard to determine the functionality of the site’s processing from start to finish.

Setting: The subject property does not retain integrity of setting. Upon its completion circa 1969, the lumber processing plant displayed as one large industrial property with two single-family residences to the northwest. Due to subdivisions in 1994 and 2014 the character of the property no longer reads as one large property rather as four smaller properties. Additionally, throughout the 1990s multiple buildings were constructed on the American Wood Fibers site, which further impacted the property’s ability to be identified as a 1960s era mill and original buildings were demolished. The relationship between buildings and other features including open space can no longer be recognized as its 1960s period of development. Additionally, the paths of circulation have been altered to the point that the property’s original point of entry and access roads cannot be identified.

Materials: The subject property retains integrity of materials. Since the plant’s development circa 1969, the physical elements dating from that period of construction have been retained with little replacement. The key exterior materials dating from the construction are existent, and replacements of windows and doors on the single-family residences have not significantly affected its integrity of materials for the property as a whole.

Workmanship: Similar to integrity of materials, the subject property retains integrity of workmanship. The physical evidence of skill required to construct the circa 1969 buildings and structures have been retained due to the lack of large-scale alterations to the property since its development circa 1969.

Feeling: The subject property does not retain integrity of feeling. The property is no longer able to express itself as a working bark processing plant constructed circa 1969. Due to the ubiquitous and utilitarian nature of the site it is unable to be dated to a certain period of time and therefore cannot express a historic sense of a particular time. Furthermore, changes to the setting over time and subdivision of the original parcels also contribute to the property's inability to convey integrity of feeling.

Association: Finally, the subject property does not retain integrity of association due to the lack of links between an important historic event or person and the property.

In summary, Property 1 retains integrity of location, materials, and workmanship with a diminished integrity of design. The subject property lacks integrity of setting, feeling, and association.

Summary of Evaluation Findings

In conclusion, Property 1 does not appear eligible for listing in the NRHP, the CRHR, or the County of Tuolumne Register of Cultural Resources due to a lack of historical associations and architectural merit. As such, this property does not appear to be a historic property under Section 106 of the NHPA or a historical resource under CEQA.

5.2 Property 2, Sierra Railroad – Mainline, Keystone Segment

Property Description

Property 2 is comprised of a 0.50-mile segment of the Sierra Railroad alignment (see Figure 3). The Sierra Railroad's original mainline ran from Oakdale to Jamestown and was constructed in 1897. In 1900, the line was extended to Tuolumne City, totaling 56.2 miles in length. Most of the original standard gauge line is still in place and carries railroad traffic terminating just west of Standard. The railroad's Keystone Segment is located 10 miles southeast of Jamestown in rural Tuolumne County, south of the intersection of State Highway 108/120 and La Grange Road. The segment runs 0.5 miles in length at a height of 1 to 6 feet. The roadbed is carried on a berm at varying heights with the northern end at Highway 108/120 much larger than the southern end. Rails appear to have the date stamp

of 1929 constructed of wood ties, metal spikes, and a crushed stone roadbed (Exhibit 18). Property 2 does not display any noticeable changes since it was last evaluated in 2008. The railroad remains an active railway.



Exhibit 18. Sierra Railroad - Keystone Segment, view to north (Dudek image DSCN8063).

5.2.1 NRHP/CRHR Statement of Significance Update

The Sierra Railroad – Mainline, including the Keystone Segment (P-55-000347) was previously recommended eligible under NRHP and CRHR Criterion A/1 as a contributor to the existing Sierra Railroad Historic District for its impact on the social and economic development in Tuolumne County. However, it is unclear if the property was ever formally listed. Currently, the status is listed as “Eligible (3D) Appears eligible for listing in the National Register as a contributor to a district that has been fully documented according to OHP instructions and appears eligible for listing.” For the full evaluation, see the 2008 report titled *Second Addendum to Cultural Resources Inventory Report for the Yosemite Ranch Golf and Wetland Preserve Project at Yosemite Junction, Tuolumne County, California*, written by Laura Leach-Palm (Leach-Palm 2008). The 2008 JRP Historical Consulting Services report evaluated the Sierra Railroad under NRHP and CRHR criteria but did not provide an evaluation under local County of Tuolumne designation criteria. Therefore, the following provides an updated evaluation for the Keystone segment of the Sierra Railroad in consideration of local designation criteria.

5.2.2 Tuolumne County Statement of Significance

The County of Tuolumne County’s criteria for designation of a cultural resource closely follow those criteria outlined for the NRHP and CRHR. Based on the significance evaluation from the 2008 JRP Historical Consulting Services report, the Sierra Railroad – Mainline, Keystone Segment is recommended eligible for listing in the NRHP and CRHR. Given that the railroad segment remains largely unchanged since 2008 and continues to be an important part of the County’s history, it is also recommended as eligible for the Tuolumne County Register of Cultural Resources under Criterion 1, based on the following significance evaluation.

1. Exemplifies or reflects significant elements of Tuolumne County’s cultural, social, religious, economic, political, engineering or architectural history

The Sierra Railroad – Mainline, Keystone Segment appears eligible under County Criterion 1 due to its enormous impact on the social and economic development in Tuolumne County. First, the railroad is closely associated with the quartz mining era in California that peaked in Tuolumne County between 1893 and 1920. The railroad eventually developed into a major transporter of lumber in the area to facilitate logging and milling operations. Beginning in 1914, the railroad also transported supplies of materials for the construction of major regional water resources including the City of San Francisco’s O’Shaughnessy Dam in Hetch Hetchy Valley in 1923 and storage reservoirs for local irrigation districts formed behind the Don Pedro Dam in 1923 and Melones Dam in 1926. The railroad also transported passengers to towns along its alignment and connected with interregional transportation services at its Oakdale Station terminus. Therefore, due to the Sierra Railroad – Mainline, Keystone Segment’s vital contributions to the economy and development of Tuolumne County, it appears eligible under County Criterion 1.

2. Identified with historic persons or with important local, state or national history

The Sierra Railroad – Mainline, Keystone Segment does not appear eligible under County Criterion 2 for associations with significant individuals. Although individuals such as Thomas S. Bullock and William Crocker were involved in planning, financing, and designing the railroad, the railroad line does not retain integrity to their periods of association. Therefore, the railroad segment does not appear eligible under County Criterion 2.

3. Embodies distinguished architectural characteristics valuable for study or a period style or method of construction or is a valuable example of the use of indigenous materials or workmanship

The Sierra Railroad – Mainline, Keystone Segment does not appear eligible under County Criterion 3 as embodying distinctive architectural characteristics of a period style or method of construction. Under this criterion, the proposed period of significance would be 1897 to 1900, the dates of initial construction of the railroad. As a result of the modifications to the line that occurred after the initial construction, the Sierra Railroad is more of a product of the 1910s and 1920s than 1900. Within this context, the railroad represents a late example of construction techniques that are not valuable for the study of railroad technology. Therefore, the railroad segment does not appear eligible under County Criterion 3.

4. Representative of a notable work of a master builder or architect

The Sierra Railroad – Mainline, Keystone Segment, does not appear eligible under County Criterion 4. Archival research failed to identify the railroad’s builder or architect and due to the type of resource as a method of transportation it is unlikely to be the work of a master. Therefore, the railroad segment does not appear eligible under County Criterion 4.

5.2.3 Character-Defining Features

The character-defining features associated with the Sierra Railroad – Mainline, Keystone Segment, are limited to its location, setting, original alignment, construction materials, and its ability to convey use a railroad alignment,

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6 Findings and Conclusions

The following section presents a summary of eligibility conclusions for Property 1 and Property 2 located in the API.

Property 1, SPI Keystone Mill and Support Facilities located on APN 063-190-056, is not eligible for listing in the NRHP, the CRHR, or the Tuolumne County Register of Cultural Resources due to a lack of historical associations and architectural merit. As such, Property 1 is not a historical resource under CEQA.

Property 2 which is a segment of the Sierra Railroad – Mainline, including the Keystone Segment (P-55-000347), is eligible for listing in the NRHP, CRHR, and Tuolumne County Register of Cultural Resources under Criteria A/1/1. Therefore, Property 2 is considered a historical resource under CEQA.

The purpose of this technical report is to investigate the Central Sierra Nevada (Tuolumne) site that is being studied as part of the EIR that is being prepared for the Golden State Natural Resources Forest Resiliency Demonstration Project in compliance with CEQA. Potential project related Impacts to CEQA historical resources will be addressed in the EIR.

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Appendix A

Interested Party Correspondence

From: [Erin Jones](#)
To: research.tcmuseum@gmail.com
Cc: [Katie Haley](#)
Subject: Golden State Natural Resource, Keystone Site, Tuolumne County
Date: Wednesday, July 5, 2023 8:34:00 AM
Attachments: [Tuolumne County Historical Society and Museum IPL.pdf](#)

To Whom it May Concern,

I am reaching out today on behalf of Dudek and the Golden State Finance Authority to provide you with some information about the Golden State Natural . As part of the cultural resources study for the proposed project, Dudek is consulting all regional historical organizations to determine if there are any known historic or cultural resources that may be within the proposed project area. Please see the attached letter and map for more information about the nature and location of the project, and please feel free to contact me should you have questions or information regarding cultural or historical resources in this area.

Thank you,

Erin "EJ" Jones

Erin Jones, MA (They/Them)

Architectural Historian

ejones@dudek.com

1810 13th Street, Sacramento, Ca 95811



July 5, 2023

Tuolumne County Planning Division
2 South Green Street
Sonora, CA 95370

Subject: Golden State Natural Resource, Keystone Site, Tuolumne County

Dear Ms. Taryn Vanderpan,

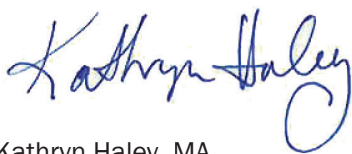
Dudek has been retained by the Golden State Finance Authority to prepare a built environment inventory and evaluation report as part of the California Environmental Quality Act (CEQA) compliance process for the Golden State Natural Resources, Keystone Site, Tuolumne County, California (Project). The Project is located approximately 9.4 miles southwest of the census-designated place of Jamestown in Tuolumne County, California. The proposal includes redeveloping the site to facilitate the transport of forest material (such as trees or underbrush that have no lumber value) in by truck, conversion of such material into wood fuel pellets, and then shipment of the pellets from the Project area using the existing railroad line. The United States Army Corps of Engineers is the lead agency for the Project. Please see the attached project location map.

As part of our study, we are consulting regional historical organizations to determine if there are any known historic or cultural resources that may be affected by the proposed project. Your efforts in this process will provide invaluable information for the proper identification and treatment of such resources. If you have any questions or comments regarding cultural resources in the proposed project area, please direct your response to:

Dudek
Attn: Kathryn Haley
Phone: 916-539-2202
Email: khaley@dudek.com

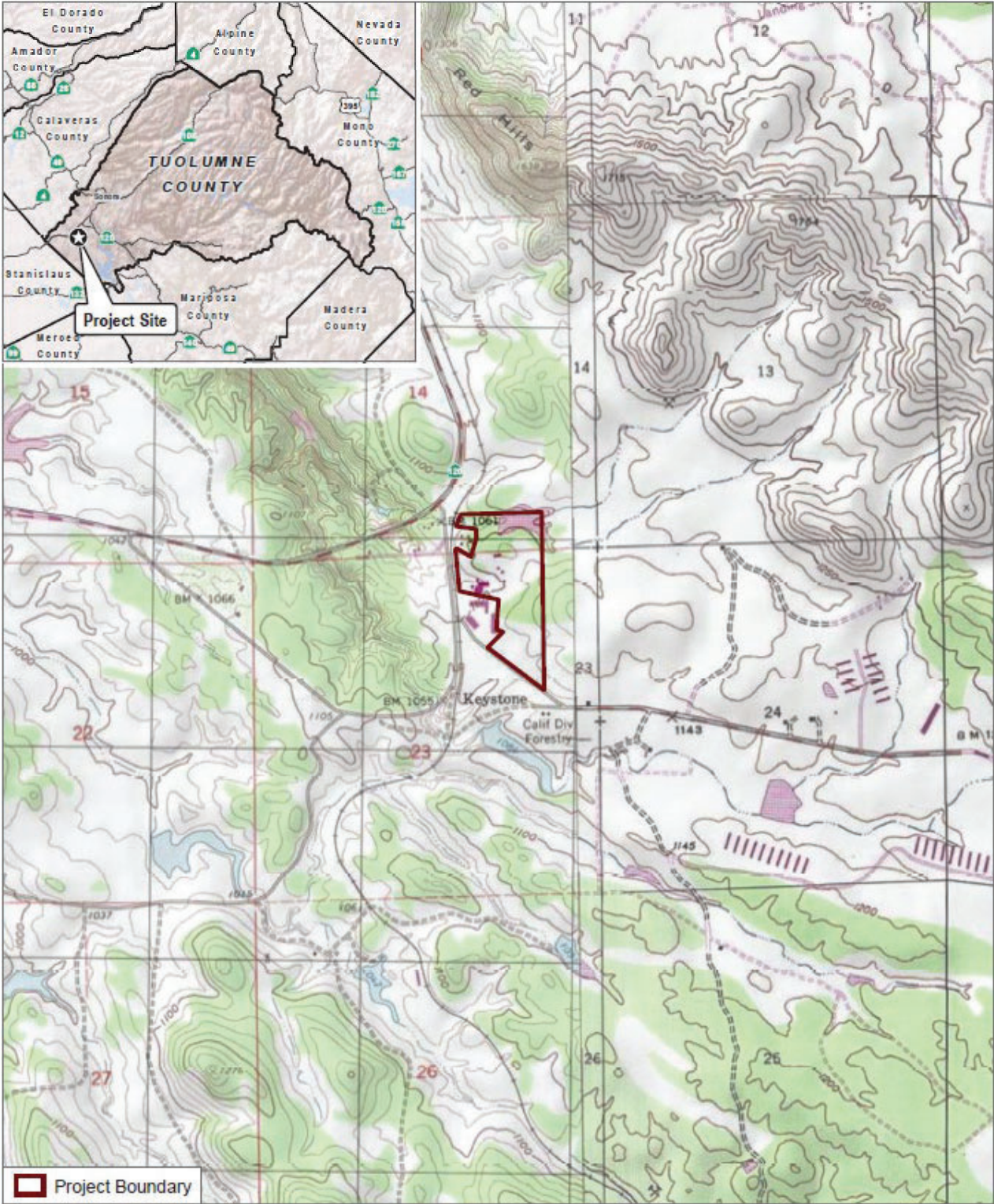
All comments and letters received will be included in the reports generated by this study. Thank you very much for your time regarding our request.

Sincerely,



Kathryn Haley, MA
Senior Architectural Historian

Enclosure: Golden State Natural Resources, Keystone Site Project Location Map



SOURCE: USGS 7.5-Minute Series Keystone Quadrangle



FIGURE 1
Project Location
SPI Keystone Project

From: [Erin Jones](#)
To: TVanderpan@co.tuolumne.ca.us
Cc: [Katie Haley](#)
Subject: Golden State Natural Resources, Keystone Site, Tuolumne County
Date: Wednesday, July 5, 2023 10:03:00 AM
Attachments: [Tuolumne County Planning Dept IPL.pdf](#)

Dear Ms. Vanderpan,

I am reaching out today on behalf of Dudek and the Golden State Finance Authority to provide you with some information about the Golden State Natural Resources Project. As part of the cultural resources study for the proposed project, Dudek is consulting all regional historical organizations to determine if any known historic or cultural resources may be within the proposed project area. Please see the attached letter and map for more information about the nature and location of the project, and please feel free to contact me should you have questions or information regarding cultural or historical resources in this area.

Thank you,

Erin "EJ" Jones

Erin Jones, MA (They/Them)

Architectural Historian

ejones@dudek.com

1810 13th Street, Sacramento, Ca 95811



July 5, 2023

Tuolumne County Historical Society and Museum
158 Bradford Street
Sonora, CA 95370

Subject: Golden State Natural Resource, Keystone Site, Tuolumne County

To Whom It May Concern:

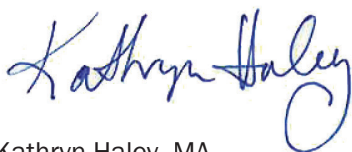
Dudek has been retained by the Golden State Finance Authority to prepare a built environment inventory and evaluation report as part of the California Environmental Quality Act (CEQA) compliance process for the Golden State Natural Resources, Keystone Site, Tuolumne County, California (Project). The Project is located approximately 9.4 miles southwest of the census-designated place of Jamestown in Tuolumne County, California. The proposal includes redeveloping the site to facilitate the transport of forest material (such as trees or underbrush that have no lumber value) in by truck, conversion of such material into wood fuel pellets, and then shipment of the pellets from the Project area using the existing railroad line. The United States Army Corps of Engineers is the lead agency for the Project. Please see the attached project location map.

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Dudek
Attn: Kathryn Haley
Phone: 916-539-2202
Email: khaley@dudek.com

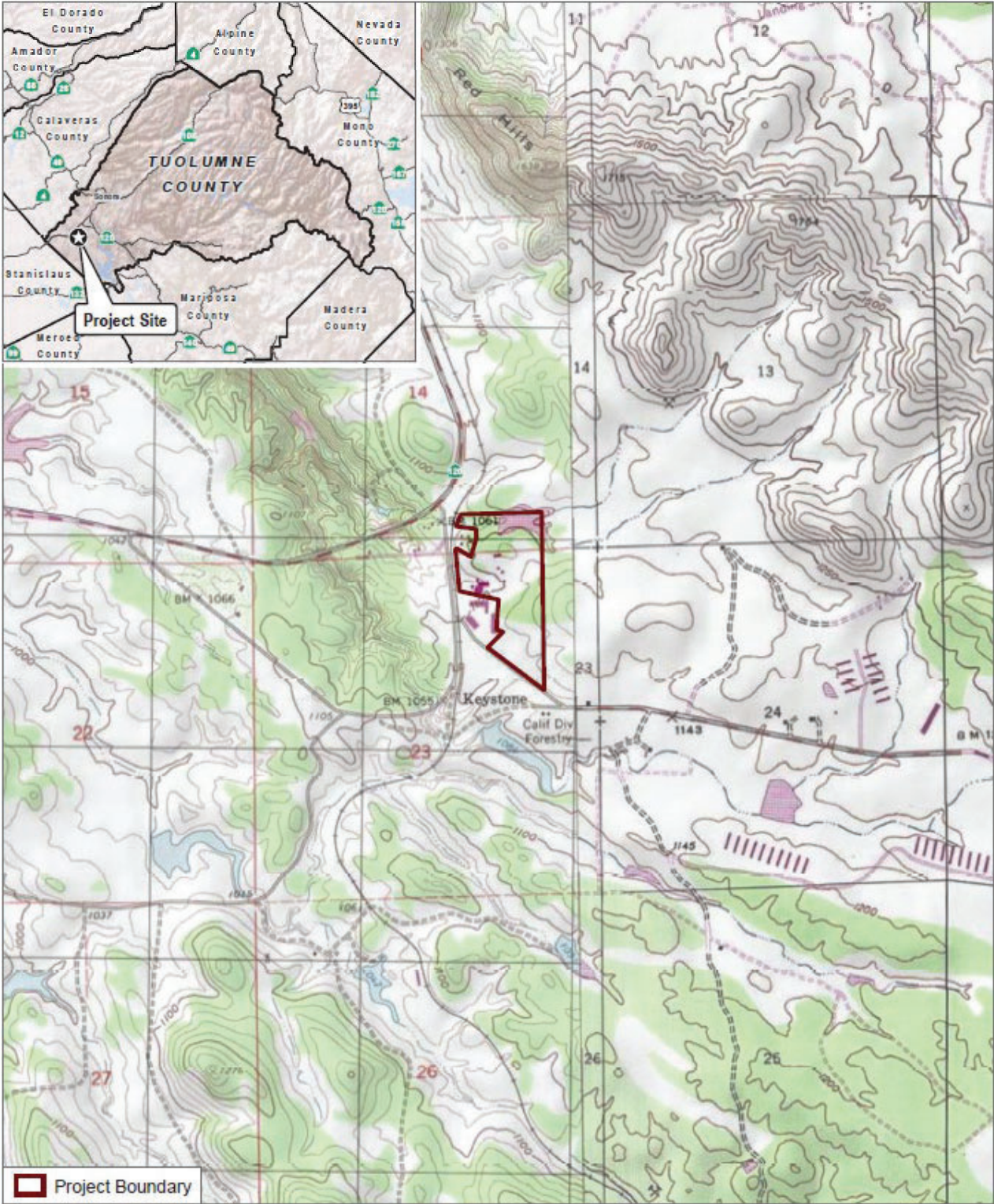
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Sincerely,



Kathryn Haley, MA
Senior Architectural Historian

Enclosure: Golden State Natural Resources, Keystone Site Project Location Map



SOURCE: USGS 7.5-Minute Series Keystone Quadrangle



FIGURE 1
Project Location
SPI Keystone Project

Appendix B

DPR forms for Property 1 and Property 2

The full set of previous DPR records for P-55-000347 can be made available upon request.

State of California & The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 1 of 24 *Resource Name or #: (Assigned by recorder) SPI Keystone Mill

P1. Other Identifier: _____

*P2. Location: Not for Publication Unrestricted

*a. County Tuolumne and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Keystone Date 2000 (2002 ed,) T 1S; R 13E; NE 1/4 of NE 1/4 of Sec 23; Mount Diablo B.M.

c. Address 12001, 12015, 12051, and 12055 La Grange Road City La Grange and Jamestown Zip 95329-95327

d. UTM: (Give more than one for large and/or linear resources) Zone 10S, 719580 mE/ 4191012 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APNs 063-190-056, 063-190-051, 063-350-004, and 063-350-005; Latitude: 37°50'24.5"N, Longitude: 120°30'16.6"W

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

The property is currently comprised of the abandoned SPI Keystone mill and support facilities located on APN 063-190-056 that is 58.56 acres. **See Continuation Sheet**

*P3b. Resource Attributes: (List attributes and codes) HP8. Industrial Building; HP2. Single Family property; HP6. 1-3 commercial building; HP4. Ancillary building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



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

P5b. Description of Photo: (view, date, accession #) View to northeast, 1/12/21
DSCN8031

*P6. Date Constructed/Age and Source: Historic Prehistoric Both Circa 1969, Historic Newspapers

*P7. Owner and Address: Sierra Pacific Industries
PO Box 496014, Redding,
California 96049

*P8. Recorded by: (Name, affiliation, and address) Fallin Steffen,
MPS, 1102 R Street,
Sacramento, California

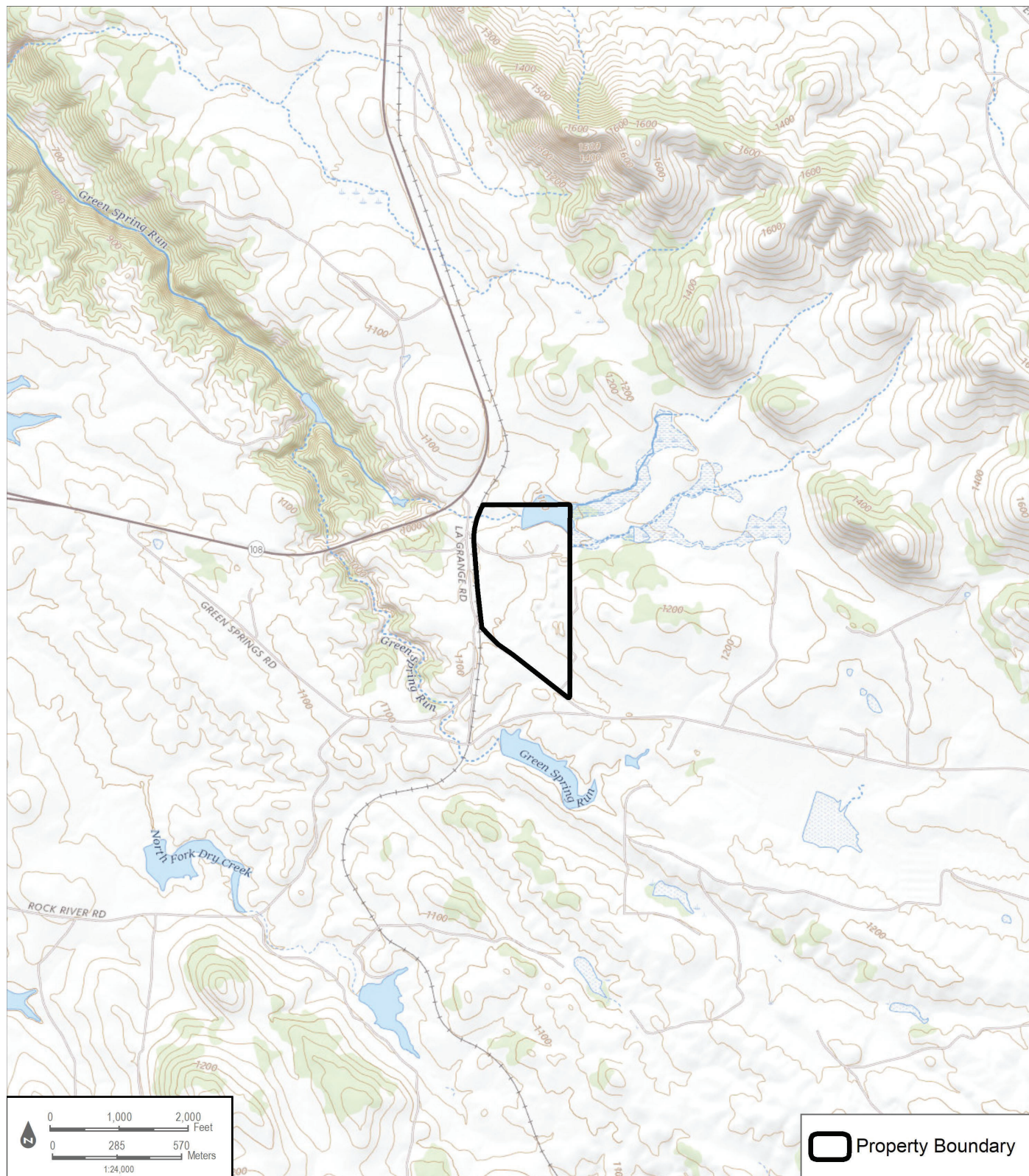
*P9. Date Recorded: January 12, 2021

*P10. Survey Type: (Describe) Pedestrian

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")
Steffen, F., et al. 2021. Built Environment Inventory and Evaluation Report for Golden State Natural Resources Forest Resiliency Demonstration Project, Central Sierra Nevada (Tuolumne) Site, Tuolumne County, California. (Sacramento, California): Dudek.

*Attachments: NONE Location 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): _____

Page 2 of 24 *Resource Name or # (Assigned by recorder) SPI Keystone Mill
*Map Name: Keystone, California *Scale: 1:24,000 *Date of map: 2000 (2002 ed.)



BUILDING, STRUCTURE, AND OBJECT RECORD

*Resource Name or # (Assigned by recorder) SPI Keystone Mill *NRHP Status Code 6Z
Page 3 of 24

B1. Historic Name: SPI Keystone Mill
B2. Common Name: Keystone Mill
B3. Original Use: Bark processing plant B4. Present Use: Bark processing plant

*B5. Architectural Style: Ranch

*B6. Construction History: (Construction date, alterations, and date of alterations)
Constructed circa 1969. Demolition of two buildings (Pre-1987). Subdivision of parcel to allow construction of bark processing plant (1990). Subdivision of parcel to separate two single family residential parcels (2014). Unknown dates: Replacement and removal of fenestration, Alteration of fenestration openings, Reroofing, and Addition of security doors.

*B7. Moved? No Yes Unknown Date: _____ Original Location: _____

*B8. Related Features:

B9a. Architect: unknown b. Builder: unknown

*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.)

Historical Overview of Tuolumne County

Spanish Period (1769-1822)

European exploration into Central California and what would later become Tuolumne County began in 1602 with a Spanish envoy mission into Monterey Bay by Sebastián Vizcaíno. The purpose of the voyage was to survey the California coastline to locate feasible ports for shipping, and Vizcaíno had explicit instructions prohibiting the creation of settlements and interacting with local Native Americans. Finding the bay to be commodious, fertile, and extremely favorable for anchorage during eastward voyages from Manila to Acapulco, Vizcaíno named the Bay "Monterey" after the Conde de Monterey, the present Viceroy in Mexico (Chapman 1920; Hoover et al 2002). **See Continuation Sheet.**

B11. Additional Resource Attributes: (List attributes and codes) _____

*B12. References:

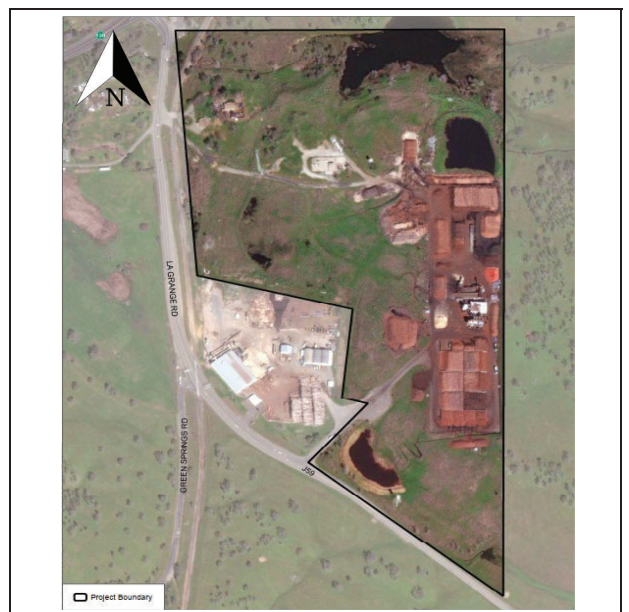
See Continuation Sheet.

B13. Remarks:

*B14. Evaluator: Nicole Frank, MSHP

*Date of Evaluation: April 2021

(This space reserved for official comments.)



CONTINUATION SHEET

Property Name: SPI Keystone Mill

Page 4 of 24

*P3a. Description (continued):

Historically, the mill was a much larger property that is defined for the purposes of this study as Property 1 and includes the following APNs:

- o APN 063-190-056, abandoned SPI Keystone Mill located at 12001 La Grange Road
- o APN 063-350-004, residence located at 12051 La Grange Road
- o APN 063-350-005, residence located at 12055 La Grange Road
- o APN 063-190-051, American Wood Fibers located at 12015 La Grange Road

The property includes 15 components including 8 buildings, 5 structures, and 2 foundations. Surrounding the property is a chain-link fence with additional chain-link fences around the two residential buildings and American Wood Fibers. The abandoned SPI Keystone mill has two access points from La Grange Road, including southwest access by a paved driveway and northwest access by paved road. The two residences and American Wood Fibers are located directly off La Grange Road. Around Component 9, Foundation, is a partially paved truck turnaround. To the north of the abandoned SPI Keystone mill buildings are two improved springs with concrete footings for a sluice dam. Open grass spaces are located to the south, west, and northwest of the abandoned SPI Keystone mill. South of the American Wood Fibers buildings is an area of log storage. Figure 4, Property 1 Site Map, identifies the location of the buildings and structures within the property and their functions.

Component 1, Entrance Station

Component 1, Entrance Station, is one-story and rectangular in plan building with a front facing gable roof on a concrete foundation constructed circa 1969. The building's exterior walls are clad in vertical composition board with the roof sheathed in rolled composition roofing. The building's main (northeast) elevation is accessed by a set of two concrete steps. Fenestration includes metal horizontal sliding windows and a half-glass composition entry door. Observed alterations include changes in fenestration openings and removal of rain gutters (Exhibit 1).

Component 2, Water Tank

Component 2, Water Tank, is a multicolumn metal water storage tank that rises approximately 100 feet from the ground, constructed circa 1969 (Exhibit 2).

Component 3, Shed

Component 3, Shed, is one-story and square-in-plan building with a front facing gable roof constructed circa 1969. The building's exterior walls are clad in composition wood with the roof sheathed in corrugated metal sheltering a water supply well. The building's southeast elevation is open (Exhibit 3).

Component 4, Stalls

Component 4, Stalls, are constructed of concrete masonry units rising approximately 20 feet high, constructed circa 1969. The northern and the southern ends display four smaller stalls with three larger stalls on the western and eastern ends (Exhibit 4).

Component 5, Office

Component 5, Office, is a two-story rectangular-in-plan building with a low-pitched front gable roof, constructed circa 1969. The exterior walls are clad in metal panels with the

CONTINUATION SHEET

Property Name: SPI Keystone Mill

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roof sheathed in rolled composition roofing. The main (west) elevation displays a large rectangular opening. Fenestration includes metal horizontal sliding windows and metal entry doors. To the south and west of the office building are attached machinery for the creation of decorative landscaping bark. This machinery includes a standard chip screen, bark hog shredder, conveyer belts, elevators, and storage silos. Observed alterations include changes in fenestration openings (Exhibit 5).

Component 6, Office

Component 6, Office, is rectangular-in-plan building with a flat roof, constructed circa 1969. The exterior walls are clad in horizontal metal paneling with a flat roof sheathed in corrugated metal. Fenestration includes metal horizontal sliding windows and a half-glass metal entry door. Observed alterations include the removal of original fenestration (Exhibit 6).

Component 7, Loading Dock

Component 7, Loading Dock, displays as rectangular in plan running west to east and constructed circa 1969. The structure is constructed out of concrete with an incline leading to a metal storage container on the eastern end (Exhibit 7).

Component 8, Loading Dock

Component 8, Loading Dock, displays as rectangular in plan running north to south and constructed circa 1969. The structure is constructed out of concrete with an incline leading to a truck pull up on the northern end (Exhibit 8).

Component 9, Foundation

Component 9, Foundation, is constructed of concrete and was likely the site of a large rectangular in plan industrial building constructed circa 1969. A review of historic aerials shows that the building was demolished prior to 1987 (Exhibit 9).

Component 10, Foundation

Component 10, Foundation, is constructed of concrete and was likely the site of a rectangular-in-plan industrial building, constructed circa 1969. A review of historic aerials shows that the building was demolished prior to 1987 (Exhibit 10).

Component 11, Water Tank

Component 11, Water Tank, is a multicolumn metal water storage tank on a wooden platform that rises approximately 100 feet from the ground, constructed circa 1969 (Exhibit 11).

Component 12, Residence

Component 12, Residence, is a one-story, irregular-in-plan, single-family residence with a side gable roof, constructed circa 1969. The building's exterior is clad in stucco with the roof sheathed in composition shingles. The main (north) elevation's fenestration includes a metal security door and horizontal sliding windows. On the southwest corner of the building is an attached side gable garage. The shed porch and interior carport display squared posts. Observed alterations include the addition of a security door, reroofing, and replacement windows (Exhibit 12).

CONTINUATION SHEET

Property Name: SPI Keystone Mill

Page 6 of 24

Component 13, Residence

Component 13, Residence, is a one-story, rectangular-in-plan, single-family residence with a side gable roof, constructed circa 1969. The building's exterior is clad in vertical composition boards with the roof sheathed in composition shingles. An interior brick chimney is located offset to the right. The main (northwest) elevation's fenestration includes vinyl horizontal sliding windows and a composition entry door. The shed porch displays squared posts. Observed alterations include replacement windows and doors and reroofing (Exhibit 13).

Component 14, Office/Residence

Component 14, Office/Residence, is a one-story, rectangular-in-plan, converted office with a side gable roof, constructed circa 1969. The building's exterior is clad in shingle and horizontal wood boards with the roof sheathed in metal paneling. The building's main (southwest) elevation displays a shed roof overhang supported by angled wooden posts. Fenestration includes vinyl horizontal sliding, fixed, and one-over-one windows and a half-glass composition entry door. Observed alterations include replacement windows and doors, reroofing, the addition of an overhang, and the conversion from a residence to an office (Exhibit 14).

Component 15, Warehouse

Component 15, Warehouse, is a two-story, rectangular-in-plan building constructed out of concrete masonry units circa 1969. The building displays a three-barrel roof sheathed in rolled composition roofing with a one-story shed roof addition on the east elevation clad in corrugated metal. Along the center of the three-barrel roofs are square vent openings. The main (south) elevation are three sets of double metal roller shutter garage doors and a single roller shutter garage door on the one-story addition. Fenestration includes corrugated metal entry doors, horizontal sliding windows, and composition doors. Observed alterations include additions to east and west elevations, replacement doors, and alteration of fenestration openings (Exhibit 15).

Non-Historic Age Components

The property also features non-historic age components located on the current American Wood Fibers property (APN 063-190-051) that are shown in blue on Figure 4 (Property 1 Site Plan). These components were constructed after the historic age mill property was subdivided in the early 1990s and the current American Wood Fibers facility was established. According to historic aerial photography, it appears that these buildings are in place no later than 1994. These buildings include the following: production warehouse, storage buildings, offices, and garages (Exhibits 16 and 17).

***B10. Significance (continued):**

Despite being mapped as an advantageous berth for Spanish shipping efforts, the epicenter of Spanish settlement in Alta California did not make its way to the Monterey Bay until the second half of the eighteenth century. In an effort to prevent the establishment of English and Russian colonies in northern Alta California, Don Gaspar de Portolá, the Governor of Baja, embarked on a voyage in 1769 to establish military and religious control over the area. This overland expedition by Portolá marks the beginning of California's Historic period, occurring just after King Carlos III of Spain installed the Franciscan Order to direct religious colonization in assigned territories of the Americas. With a band of 64 soldiers, missionaries, Baja (lower) California Native

CONTINUATION SHEET

Property Name: SPI Keystone Mill

Page 7 of 24

Americans, and Mexican civilians, Portolá established the Presidio of San Diego, a fortified military outpost, as the first Spanish settlement in Alta California. In July of 1769, Padre-Presidente Franciscan Fr. Junípero Serra, founded Mission San Diego de Alcalá at Presidio Hill, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823, including Mission Santa Cruz (Hoover et al. 2002: 226; Lehmann 2000; Koch 1973).

In 1777, San José became the first pueblo or town settlement in Spanish California, located on the eastern bank of the Guadalupe River and the closest mission to Tuolumne County. The pueblo was given its official name in 1778 of El Pueblo de San José de Guadalupe. The Guadalupe River acted as the natural boundary between the lands controlled by the mission and the pueblo. There was tension between the people that occupied the mission and those that lived in the nearby pueblo over land and water rights in the surrounding area. This tension was subsided when on the orders of Father Magin de Catalá a road was built by Native Americans to link the mission with the pueblo named the Alameda (Laffey 1992; A and A 2011).

The pueblo located at San José's primary function was to supplement the crops grown in the missions to support other granaries in Monterey and San Francisco. Although the settlement, which was originally located near the Guadalupe River, was subject to severe winter flooding and the site of the pueblo was moved approximately one mile south to higher ground in 1791. The center of the final pueblo site was the current site of Market Street Plaza. One of the first actions taken towards permanent settlement was the building of a dam above the settlement that collected water for distribution throughout the town. Homes at this time were small adobe structures, which were clustered around the water irrigation system, the market square, and the crossing of the roads to Monterey, the Santa Clara Mission, and the embarcadero at Alviso (Laffey 1992; A and A 2011).

The area remained agriculturally based with early colonists planting corn, beans, wheat, hemp and flax and in addition to setting out small vineyards and orchards. A portion of the crops were taxed for the support of the local presidios and their soldiers, while others were traded in Monterey for manufactured goods imported from Spain and Mexico. In 1810, a civil war had erupted in Mexico and as a result California was cut off from Mexico and all of its trade. Within the next decade, the Santa Clara Valley economy began to lag due to changing administrative policies of the newly established Mexican government. With rising tensions to the south, the control the Spanish Crown possessed over the Santa Clara Valley soon began to be challenged (Laffey 1992; Butler 2002).

Mexican Period (1822-1848)

After more than a decade of intermittent rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants. In addition to eliminating the system of Spanish nobility in California, the Spanish Missions across the territory were secularized during this period. The secularization of the Missions meant that all communal mission property was placed in a trust with the intention of being returned to the local Native American population. Extensive land grants were established in the interior during this period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated colonization efforts (Koch 1973; Lehmann 2000).

Tuolumne County remained relatively cut-off from the secularization and colonization occurring in the coastal cities of San Jose and Monterey. Few accounts of the County

CONTINUATION SHEET

Property Name: SPI Keystone Mill

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from pre-1848 survive rather the area was a significant residential and resource procurement area for the Central Sierra Me-Wuk. The County's indigenous peoples, the Central Sierra Me-Wuks, arrived between 2,000 and 600 years ago and pre-1848 it was estimated that there were 35 villages in this part of the Sierra Nevada (Tuolumne County 2015; Marvin and Brejla 2010).

American Period (1848–Present)

The Mexican American War ended with the Treaty of Guadalupe Hidalgo in 1848, ushering California into its American Period. Santa Cruz was designated as 1 of the 27 original counties of California on February 18, 1850, shortly before California officially became a state with the Compromise of 1850. The new state of California recognized the ownership of lands in the state distributed under the Mexican Land Grants of the previous several decades (Lehman 2000; Koch 1973).

In Tuolumne County, historic activity began soon after the widely publicized discovery of gold in 1848. By the Gold Rush period (1848–1855), the Central Sierra Me-Wuk's territory had been intruded on several times and the number of tribes reduced. The settlement patterns established over thousands of years were altered due to high mortality rates and the encroachment of white settlers on the land. Villages were either abandoned or had their inhabitants forcibly removed, leading to the consolidation of many villages over time. After the discovering of gold in the area by either Benjamin F. Wood in Jamestown or on Mormon Creek by a group of Mormons, miners invaded the region. In Columbia, a shanty town that started with several miners grew to a community of several thousand with more than 500 buildings and over 150 businesses. The Gold Rush came and went quickly due to the depletion of gold fields and six major fires between 1854 and 1866. By the mid-1860s the mining industry in the County leveled off and many families moved to other settlements resulting in the County's population decreasing by nearly 50 percent between 1860 and 1870 (Tuolumne County 2015).

Starting in the late 1880s, mining technology advanced and there was an infusion of foreign capital into the County allowing for a second Gold Rush. Jamestown remained a trade and supply depot for mining higher in the foothills and became the prime location on the roads from the Central Valley. After mining developed as a profitable venture again, a large increase in assessed valuation allowed the County to construct new public services. Agriculture and livestock raising including cattle ranches became dominant local industries. This resulted in the construction of many homes, a population increase, and whole communities being established and enlarged. Along with mining and agriculture, the timber industry emerged as a dominant force in the County as a response to the need for timbers to support the mines, build stamp mills, and construct buildings. The timber industry provided the momentum needed to develop the Sierra, Sugar Pine, West Side, and Cherry Valley railways. By 1900, the railroad industry for logging, passenger, and freight services generated more economic opportunities for the area. The Sierra Railroad, incorporated in 1897, extended from Oakdale to Tuolumne and hauled a variety of things including lumber, ore, passengers, agricultural products, and livestock. The railroad's principal investors included Thomas S. Bullock, a New York capitalist and William Crocker, a San Francisco banker and treasurer of the California Exploration Company. The Sierra Railroad between 1893 and 1920 was closely associated with the quartz mining era in California that peaked in Tuolumne County during this time (Tuolumne County 2015; Tuolumne County Historical Society 2021a, 2021b, 2021c).

The presence of the Sierra Railroad allowed large mills to develop to cut lumber for local use and exportation. The West Side Flume and Lumber Company, later renamed the West Side Lumber Company, reincorporated in 1899, and the Standard Lumber Company, incorporated in 1901, were the County's two largest lumber operations opening planning

CONTINUATION SHEET

Property Name: SPI Keystone Mill

Page 9 of 24

mills and box factories. The West Side Lumber Company's mill amongst others, furnished the largest source of revenue for the Sierra Railroad with the two industries being codependent on each other for success. The Sierra Railroad had connections to the Santa Fe and Southern Pacific railroads in Oakdale allowing it to be part of the national rail network. Tourism to the area increased as a result of the railroad, allowing for the construction of vacation homes in the hills east of Sonora in the 1920s. The railroad reached its height of activity just prior to World War I when it was used to transport materials for building the City of San Francisco's O'Shaughnessy Dam in Hetch Hetchy Valley in 1923 and storage reservoirs for local irrigation districts formed behind the Don Pedro Dam in 1923 and Melones Dam in 1926 (Tuolumne County 2015; Tuolumne County Historical Society 2021b, 2021c).

By World War I, the mines once again became inactive with many people moving to the San Francisco Bay Area to work in war-related industries. Automobiles and improved roads changed the balance of imports and exports in the agricultural industry, with less products produced locally and more imported. The Great Depression in 1929 affected the local agricultural and timber industries with a small mining boom in the mid-1930s due to the increased price of gold and low operation costs. The start of World War II put a stop to the mining industry in the area with the federal government ordering all mines to close in 1942. The Sierra Railroad - Mainline was reconstructed with heavier rail to accommodate the postwar housing booms demand of forest and mineral products. During the 1940s into the 1950s, the railroad was kept afloat by transporting freight and operating its steam-era roundhouse in Jamestown for tourists, railroad enthusiasts, and movie producers. Despite switching from steam to diesel locomotives in 1955 the public's interest in the older railcars remained. In 1971, Railtown 1897 opened in Jamestown and was acquired by the Department of Parks and Recreation as a State Historic Park in 1982 (Railtown 1897 2021). Tuolumne County experienced several decades of growth between 1970 and 1990 with the population increasing from 22,169 to 48,456. Despite the increase in population the lumber industry in Northern California has been on a steady decline since the 1980s, with 119 lumber mills present in 1987 decreasing to 59 by 1999. By 2000, the population leveled off with the County retaining its tight knit reputation established early in its history (Railtown 1897 2021; Tuolumne County 2015, 2002).

The Sierra Railroad - Mainline was evaluated in 2008 by JRP Historical Consulting LLC and found to meet the criteria for listing in the NRHP and CRHR under Criterion A (1) as a contributor to the existing Sierra Railroad Historic District. For a detailed history of the Sierra Railroad, see the 2008 report titled *Second Addendum to Cultural Resources Inventory Report for the Yosemite Ranch Golf and Wetland Preserve Project at Yosemite Junction, Tuolumne County, California*, written by Laura Leach-Palm (Leach-Palm 2008).

History of the Property

The area that encompasses the property, known as Keystone, began development in 1898 when the Sierra Railroad rerouted away from its original mainline from Don Pedro to go around the Keystone Area. The new route was chosen to avoid boxcar buildups created by a lack of siding trackage built to allow some train cars or boxcars to move off the side, while others stayed on the track. This new line ran parallel to the original mainline and offered both passenger and freight travel. By the 1920s, Sierra's mainline stations Arnold, Paulsell, Keystone, and Black Oak were retired as passenger stops (California State Railroad Museum Library 2001).

Between the 1920s and the early 1960s, Property 1 remained undeveloped with the Sierra Railroad (Property 2) running along the property's western boundary. In 1963, Sequoia Pine Mills Inc. a subsidiary of Great Western Lumber Company of Downey began developing

CONTINUATION SHEET

Property Name: SPI Keystone Mill

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the 50-acre site on La Grange Road just off Highway 108 as a lumbermill. The company's total investment in the development of the property was \$750,000 including the construction of a temporary office (Oakland Leader 1963). The company maintained their headquarters and lumber manufacturing facilities at Keystone until 1969 when the Fibreboard Corporation acquired Sequoia Pine Mills, Inc. for shares of common stock (Oakland Tribune 1969). Throughout the 1960s, Fibreboard purchased many of the lumber mills in Tuolumne County and had a large presence in the area. By 1969, two single-family Ranch style residences had been constructed in the northwest corner of the property located at 12055 and 12051 La Grange Road. These two residences were likely used to as housing for managers and workers at the Keystone mill. Also, in 1969 the company sponsored the first passenger train on the Sierra line since 1963 on a trip from Jamestown to Sonora (Larson 2008).

The Fibreboard Corporation had their headquarters in Walnut Creek, California, and besides wood products, the corporation had interests in synthetic building materials, industrial insulation, and ski resorts. In October 1990, a permit was issued to allow the construction of a bark processing plant at Keystone. The Keystone plant operated as a typical bark processing plant, which generates decorative bark and mulch products for landscaping from conifers processed through a sawmill. By the mid-1990s, the company owned two sawmills, plywood plant, and a bark plant in Standard, Chinese Camp, and Keystone. Fibreboard at the time was the largest private employer in Tuolumne County. Despite the business's success, the industry's survival was threatened by environmental restrictions and bureaucratic bottlenecks in the U.S. Forest Service. Timber profits decreased by 1995 with \$12.7 million compared to \$18.5 million the year before. The company's stock jumped 28% in June 1995 after the announcement that it was "exploring the possible sale" of its Wood Products division based in Tuolumne County, including its mill at Keystone (DeLacy 1995).

In 1994, Fibreboard's Keystone property was subdivided creating a separate parcel for its bark processing plant. This plant is currently occupied by American Wood Fibers at 12015 La Grange Road and operates as a producer of specialty forestry products including large and small animal bedding, wood shavings, industrial wood flour, premium wood pellet products, firewood, soil and compost. Throughout the 1990s, the property had multiple buildings constructed onsite to facilitate the plant's production including a warehouse, storage buildings, offices, and garages (AWF 2021; NETR 2021).

By 1995, the company sold its Wood Products Group to SPI, the deal included 76,000 acres of timberland and all of the operating facilities at Standard, Chinese Camp, and Keystone in Tuolumne County and Red Bluff in Tehama County for \$245 million. Keystone continued to be used as a bark processing plant by SPI as the only decorative bark plant owned the company at the time. SPI maintained ownership of the mills at Standard, Chinese Camp, and Keystone and continued to thrive due to owning trees on 1.5 million privately owned acres throughout California. In 2011, 2 years after closing its Standard mill because of tight lumber supply and weak demand, the 91-year old mill reopened as a sawmill employing 110 people. In Tuolumne County, SPI employed 256 people, including 122 at the cedar fencing plant near Chinese Camp and 24 people at the Keystone landscaping bark plant. In 2014, SPI's Keystone parcel was subdivided again with the division of two single-family residential parcels from the main parcel along La Grange Road. Keystone remained as SPI's only bark plant until 2020, when the company opened the Lincoln Bark Plant in Lincoln California and Sonora Bark Plant in Sonora, California. In October 2020, the Keystone facility was purchased from SPI by the Golden State Natural Resources Corporation as a biomass site intended to produce wood pellets, and then ship the products overseas to Asian markets where the demand is high. The property no longer operates as a bark

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processing plant, and by 2021 all facilities on the site had been abandoned (Jardine 1999; DeLacy 1995; Draffan 2006; Handen 2020).

NRHP/CRHR Statement of Significance

In consideration of Property 1's lack of significant associations and compromised historical integrity, Property 1 is recommended not eligible for listing in the NRHP, CRHR, and County of Tuolumne Register of Cultural Resources under all criteria, based on the following significance evaluation.

NRHP Criterion A: associated with events that have made a significant contribution to the broad patterns of our history

CRHR Criterion 1: is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Archival research indicates that the development of the property began in 1898 with the construction of the adjacent Sierra Railroad Keystone stop. Between the 1920s and the early 1960s, the property remained undeveloped with the Sierra Railroad running along the property's western boundary. In 1963, Sequoia Pine Mills, Inc. a subsidiary of Great Western Lumber Company of Downey, began developing the 50-acre site as a lumbermill. The company maintained their headquarters and lumber manufacturing facilities at Keystone until 1969 when the Fibreboard Corporation acquired Sequoia Pine Mills, Inc. for shares of common stock and built the majority of the buildings on site, including two single-family ranch-style residences. Throughout the 1960s, Fibreboard purchased many of the lumber mills in Tuolumne County and had a large presence in the area. By the mid-1990s, the Fibreboard Corporation owned two sawmills, plywood plant, and a bark plant in Standard, Chinese Camp, and Keystone. In 1994, Fibreboard's Keystone property was subdivided, creating a separate parcel for its bark processing plant. In 1995, when the company sold its Wood Products Group to SPI, the deal included 76,000 acres of timberland and all of the operating facilities, including Keystone for \$245 million. Keystone continued to be used as a bark processing plant by SPI as the only decorative bark plant owned by the company at the time until 2020.

In Tuolumne County the timber industry emerged as a dominant force as a response to the need for timbers to support the mines, build stamp mills, and construct buildings in the late 1880s. The presence of the Sierra Railroad allowed large mills to develop to cut lumber for local use and export out of the County. By 1900, the railroad industry for logging, passenger, and freight services generated more economic opportunities for the area. The Sierra Railroad, incorporated in 1897, extended from Oakdale to Tuolumne and hauled a variety of things including lumber, ore, passengers, agricultural products, and livestock. The start of World War II put a stop to the mining industry in the area with the federal government ordering all mines to close in 1942. The Sierra Railroad - Mainline was reconstructed with heavier rail to accommodate the postwar housing boom's demand of forest and mineral products. Tuolumne County experienced several decades of growth between 1970 and 1990, with the population increasing from 22,169 to 48,456. Despite the increase in population, the lumber industry in Northern California has been on a steady decline since the 1980s, with 119 lumber mills present in 1987 decreasing to 59 by 1999.

Property 1, despite being one of the last functional bark processing plants in Tuolumne County in the 2000s, does not represent one of the first lumber processing plants in the County nor is it one of the few plants that are still in operation. Property 1 developed decades after the rise of the lumber industry in the County, with the majority of the buildings on the property constructed circa 1969 by the Fibreboard Corporation.

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Additionally, archival research failed to indicate that the Keystone Plant was the focus of the Fibreboard Corporation or SPI's lumber processing in the area. Throughout the 1960s, the Fibreboard Corporation also purchased a number of the lumber mills in Tuolumne County, and there is no indication that their Keystone Plant was unique among those acquisitions. During SPI's ownership of the plant it was one of the smallest, employing only 24 people compared to the 122 at the cedar fencing plant near Chinese Camp. The plant operated as SPI's only bark processing plant between 1995 and 2020, but there is no indication that its existence made a significant contribution to the development of the County or the State for creating an innovative or unique method to process lumber.

Property 1 is not associated with any extraordinary event or events occurring within the context of the lumber processing industry nationally, at the state level, or locally in Tuolumne County that would distinguish it as significant. Moreover, research into the history of Property 1 revealed no evidence suggesting that the plant is associated with innovative bark processing techniques or a unique event or pattern of events considered historically significant. For these reasons, Property 1 does not appear eligible under NRHP Criterion A or CRHR Criterion 1.

NRHP Criterion B: associated with the lives of significant persons in our past.

CRHR Criterion 2: is associated with the lives of persons important in our past.

To be found eligible under Criterion B/2, the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research failed to indicate any such direct association between individuals that are known to be historic figures at the national, state, or local level and Property 1. The bark processing plant represents the collective efforts of many individuals, rather than the work of any single individual. Therefore, Property 1 is not known to have any historical associations with people important to the nation's or state's past. Due to a lack of identified significant associations with important persons in history, the plant does not appear eligible under NRHP Criterion B or CRHR Criterion 2.

NRHP Criterion 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.

CRHR Criterion 3: embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

The majority of the remaining buildings and structures within the Property 1 site are ubiquitous and prefabricated industrial buildings that are considered utilitarian, and do not represent a particular style of architecture. These are relatively common buildings that can be found at various industrial/manufacturing plants throughout the country. Furthermore, the buildings and structures are not known to be the work of an important architect, builder, engineer, or designer, and are not known to have been built using an innovative construction technique. Additionally, the two Ranch style single-family residences constructed as part of the site's development circa 1969 do not embody distinctive characteristics of a type, period, or method of construction. Multiple alterations to both buildings, including replacement windows and doors, addition of a security door, and reroofing, have affected their ability to display as 1960s era homes. Archival research failed to indicate the designer or architect of these buildings, and due to the ubiquitous style, they are unlikely to be the work of a master and do not

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Property Name: SPI Keystone Mill

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possess high artistic value. Consequently, Property 1 does not appear eligible under NRHP Criterion C or CRHR Criterion 3.

NRHP Criterion D: have yielded, or may be likely to yield, information important in history or prehistory.

CRHR Criterion 4: has yielded, or may be likely to yield, information important in prehistory or history.

There is no evidence to indicate that the subject property is likely to yield any additional information important to prehistory or history beyond what is already known. The subject property is also not associated with an archaeological site or a known subsurface cultural component. Therefore, Property 1 does not appear eligible under NRHP/CRHR Criterion D/4.

Tuolumne County Statement of Significance

The County of Tuolumne County's criteria for designation of a cultural resource closely follow those criteria outlined for the NRHP and CRHR. Based on the above significance evaluations, and in consideration of Property 1's lack of significant associations, Property 1 is also recommended ineligible as a County of Tuolumne County cultural resource under any criteria.

1. Exemplifies or reflects significant elements of Tuolumne County's cultural, social, religious, economic, political, engineering or architectural history

As stated in NRHP/CRHR Criterion A/1, Property 1 is not associated with any extraordinary event or events within the context of the lumber processing industry in Tuolumne County that would distinguish it as significant. Moreover, research into the history of Property 1 revealed no evidence suggesting that the plant is associated with innovative bark processing techniques or a unique event or pattern of events considered historically significant. For these reasons, Property 1 does not appear to be directly associated with events that have made a significant contribution to the development of lumber processing in the County. Therefore, the plant does not appear eligible under County Criterion

2. Identified with historic persons or with important local, state or national history

As stated in NRHP/CRHR Criterion B/2, archival research did not reveal an association between Property 1 and any persons who significantly contributed to the development of the county, state, or nation. Therefore, Property 1 does not appear eligible under County Criterion 2.

3. Embodies distinguished architectural characteristics valuable for study or a period style or method of construction or is a valuable example of the use of indigenous materials or workmanship

As discussed in NRHP/CRHR Criterion C/3, Property 1's buildings and structures are ubiquitous and prefabricated industrial buildings that are considered utilitarian, and do not represent a particular style of architecture. Additionally, the two Ranch style single-family residences constructed as part of the site's development circa 1969 do not embody distinctive characteristics of a type, period, or method of construction. Multiple alterations to both buildings including replacement windows and doors, addition of a security door, and reroofing have affected their ability to display as 1960s era homes. Therefore, Property 1 does not appear eligible under County Criterion 3.

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4. Representative of a notable work of a master builder or architect

As discussed in NRHP/CRHR Criterion C/3, the buildings and structures at Property 1 are not known to be the work of a master builder or architect. Additionally, archival research failed to indicate the designer or architect of the two Ranch style single-family residences constructed on the property circa 1969. Therefore, the plant does not appear eligible under County Criterion 4.

Integrity Discussion

In addition to meeting one or more of the above criteria, an eligible resource must retain integrity, which is expressed in seven aspects: location, design, setting, materials, workmanship, feeling, and association. All properties change over the course of time. Consequently, it is not necessary for a property to retain all of its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. In order to retain historic integrity, "a property will always possess several, and usually most, of the aspects" (Andrus and Shrimpton 2002). The following sections discuss the integrity of Property 1.

Location: All of the extant buildings and structures are sited on their original locations of construction in their original orientation, and therefore retain integrity of location

Design: The subject property retains diminished integrity of design. The essential elements of plan, structure, and style have remained largely intact over time. Despite this, several of the conscious decisions made during the original conception and planning of the property as a site with one industrial plant has been altered due to two subdivisions affecting the essential element of space. Additionally, over time there has been a disruption in the original paths of circulation that makes it difficult to identify how the property was accessed during its original period of development. The demolition of certain buildings has also made it hard to determine the functionality of the site's processing from start to finish.

Setting: The subject property does not retain integrity of setting. Upon its completion circa 1969, the lumber processing plant displayed as one large industrial property with two single-family residences to the northwest. Due to subdivisions in 1994 and 2014 the character of the property no longer reads as one large property rather as four smaller properties. Additionally, throughout the 1990s multiple buildings were constructed on the American Wood Fibers site, which further impacted the property's ability to be identified as a 1960s era mill and original buildings were demolished. The relationship between buildings and other features including open space can no longer be recognized as its 1960s period of development. Additionally, the paths of circulation have been altered to the point that the property's original point of entry and access roads cannot be identified.

Materials: The subject property retains integrity of materials. Since the plant's development circa 1969, the physical elements dating from that period of construction have been retained with little replacement. The key exterior materials dating from the construction are existent, and replacements of windows and doors on the single-family residences have not significantly affected its integrity of materials for the property as a whole.

Workmanship: Similar to integrity of materials, the subject property retains integrity of workmanship. The physical evidence of skill required to construct the circa 1969 buildings and structures have been retained due to the lack of large-scale alterations to the property since its development circa 1969.

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Property Name: SPI Keystone Mill

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Feeling: The subject property does not retain integrity of feeling. The property is no longer able to express itself as a working bark processing plant constructed circa 1969. Due to the ubiquitous and utilitarian nature of the site it is unable to be dated to a certain period of time and therefore cannot express a historic sense of a particular time. Furthermore, changes to the setting over time and subdivision of the original parcels also contribute to the property's inability to convey integrity of feeling.

Association: Finally, the subject property does not retain integrity of association due to the lack of links between an important historic event or person and the property.

In summary, Property 1 retains integrity of location, materials, and workmanship with a diminished integrity of design. The subject property lacks integrity of setting, feeling, and association.

Summary of Evaluation Findings

In conclusion, Property 1 does not appear eligible for listing in the NRHP, the CRHR, or the County of Tuolumne Register of Cultural Resources due to a lack of historical associations and architectural merit. As such, this property does not appear to be a historic property under Section 106 of the NHPA or a historical resource under CEQA.

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Exhibit 1. Component 1, Entrance Station, northeast elevation, view to southwest (Dudek image DSCN7793).



Exhibit 2. Component 2, Water Tank, view to north (Dudek image DSCN7805).

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Exhibit 3. Component 3, Shed, view to northwest (Dudek image DSCN8042).



Exhibit 4. Component 4, Stalls, view to southeast (Dudek image DSCN7837).

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Exhibit 5. Component 5, Office, west elevation, view to east (Dudek image DSCN7923).



Exhibit 6. Component 6, Office, south and east elevations, view to northwest (Dudek image DSCN7932).

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Exhibit 7. Component 7, Loading Dock, view to northeast (Dudek image DSCN7926).



Exhibit 8. Component 8, Loading Dock, view to northwest (Dudek image DSCN7968).

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Exhibit 9. Component 9, Foundation, view to west (Dudek image DSCN8012).



Exhibit 10. Component 10, Foundation, view to east (Dudek image DSCN8005).

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Exhibit 11. Component 11, Water Tank, view to south (Dudek image DSCN8014).



Exhibit 12. Component 12, Residence, north and west elevation, view to southeast (Dudek image DSCN8060).

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Exhibit 13. Component 13, Residence, northwest elevation, view to south (Dudek image DSCN8069).



Exhibit 14. Component 14, Office/Residence, southwest elevation, view to northeast (Dudek image DSCN8097).

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Exhibit 15. Component 15, Warehouse, south and east elevations, view to northwest (Dudek image DSCN8102).



Exhibit 16. Overview of American Wood Fibers property, view to west (Dudek image DSCN7992).

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Exhibit 17. Overview of American Wood Fibers, view to north (Dudek image DSCN8095).

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Property Name: Sierra Railroad - Keystone Segment

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*P3a. Description: Property 2 is comprised of a 0.50-mile segment of the Sierra Railroad alignment. The Sierra Railroad's original mainline ran from Oakdale to Jamestown and was constructed in 1897. In 1900, the line was extended to Tuolumne City, totaling 56.2 miles in length. Most of the original standard gauge line is still in place and carries railroad traffic terminating just west of Standard. The railroad's Keystone Segment is located 10 miles southeast of Jamestown in rural Tuolumne County, south of the intersection of State Highway 108/120 and La Grange Road. The segment runs 0.5 miles in length at a height of 1 to -6 feet. The roadbed is carried on a berm at varying heights with the northern end at Highway 108/120 much larger than the southern end. Rails appear to have the date stamp of 1929 constructed of wood ties, metal spikes, and a crushed stone roadbed (Exhibit 1). Property 2 does not display any noticeable changes since it was last evaluated in 2008. The railroad remains an active railway.



Exhibit 1. Sierra Railroad - Keystone Segment, view to north (DSCN8063).

***P8. Recorded by:** (Name, affiliation, and address)

Fallin Steffen, MPS
Dudek
1102 R Street
Sacramento, California 95811

***P9. Date Recorded:**

January 12, 2021

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

Pedestrian

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Property Name: Sierra Railroad - Keystone Segment

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*P11. Report Citation: Steffen, F., et al. 2021. Built Environment Inventory and Evaluation Report for Golden State Natural Resources Forest Resiliency Demonstration Project, Central Sierra Nevada (Tuolumne) Site, Tuolumne County, California. (Sacramento, California): Dudek.

*B10. Significance:

NRHP/CRHR Statement of Significance Update

The Sierra Railroad - Mainline, including the Keystone Segment (P-55-000347) was previously recommended eligible under NRHP and CRHR Criterion A/1 as a contributor to the existing Sierra Railroad Historic District for its impact on the social and economic development in Tuolumne County. However, it is unclear if the property was ever formally listed. Currently, the status is listed as "Eligible (3D) Appears eligible for listing in the National Register as a contributor to a district that has been fully documented according to OHP instructions and appears eligible for listing." For the full evaluation, see the 2008 report titled *Second Addendum to Cultural Resources Inventory Report for the Yosemite Ranch Golf and Wetland Preserve Project at Yosemite Junction, Tuolumne County, California*, written by Laura Leach-Palm (Leach-Palm 2008). The 2008 JRP Historical Consulting Services report evaluated the Sierra Railroad under NRHP and CRHR criteria but did not provide an evaluation under local County of Tuolumne designation criteria. Therefore, the following provides an updated evaluation for the Keystone segment of the Sierra Railroad in consideration of local designation criteria.

Tuolumne County Statement of Significance

The County of Tuolumne County's criteria for designation of a cultural resource closely follow those criteria outlined for the NRHP and CRHR. Based on the significance evaluation from the 2008 JRP Historical Consulting Services report, the Sierra Railroad - Mainline, Keystone Segment is recommended eligible for listing in the NRHP and CRHR. Given that the railroad segment remains largely unchanged since 2008 and continues to be an important part of the County's history, it is also recommended as eligible for the Tuolumne County Register of Cultural Resources under Criterion 1, based on the following significance evaluation.

1. Exemplifies or reflects significant elements of Tuolumne County's cultural, social, religious, economic, political, engineering or architectural history

The Sierra Railroad - Mainline, Keystone Segment appears eligible under County Criterion 1 due to its enormous impact on the social and economic development in Tuolumne County. First, the railroad is closely associated with the quartz mining era in California that peaked in Tuolumne County between 1893 and 1920. The railroad eventually developed into a major transporter of lumber in the area to facilitate logging and milling operations. Beginning in 1914, the railroad also transported supplies of materials for the construction of major regional water resources including the City of San Francisco's O'Shaughnessy Dam in Hetch Hetchy Valley in 1923 and storage reservoirs for local irrigation

CONTINUATION SHEET - UPDATE

Property Name: Sierra Railroad - Keystone Segment

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districts formed behind the Don Pedro Dam in 1923 and Melones Dam in 1926. The railroad also transported passengers to towns along its alignment and connected with interregional transportation services at its Oakdale Station terminus. Therefore, due to the Sierra Railroad - Mainline, Keystone Segment's vital contributions to the economy and development of Tuolumne County, it appears eligible under County Criterion 1.

2. Identified with historic persons or with important local, state or national history

The Sierra Railroad - Mainline, Keystone Segment does not appear eligible under County Criterion 2 for associations with significant individuals. Although individuals such as Thomas S. Bullock and William Crocker were involved in planning, financing, and designing the railroad, the railroad line does not retain integrity to their periods of association. Therefore, the railroad segment does not appear eligible under County Criterion 2.

3. Embodies distinguished architectural characteristics valuable for study or a period style or method of construction or is a valuable example of the use of indigenous materials or workmanship

The Sierra Railroad - Mainline, Keystone Segment does not appear eligible under County Criterion 3 as embodying distinctive architectural characteristics of a period style or method of construction. Under this criterion, the proposed period of significance would be 1897 to 1900, the dates of initial construction of the railroad. As a result of the modifications to the line that occurred after the initial construction, the Sierra Railroad is more of a product of the 1910s and 1920s than 1900. Within this context, the railroad represents a late example of construction techniques that are not valuable for the study of railroad technology. Therefore, the railroad segment does not appear eligible under County Criterion 3.

4. Representative of a notable work of a master builder or architect

The Sierra Railroad - Mainline, Keystone Segment, does not appear eligible under County Criterion 4. Archival research failed to identify the railroad's builder or architect and due to the type of resource as a method of transportation it is unlikely to be the work of a master. Therefore, the railroad segment does not appear eligible under County Criterion 4.

Character-Defining Features

The character-defining features associated with the Sierra Railroad - Mainline, Keystone Segment, are limited to its location, setting, original alignment, construction materials, and its ability to convey use a railroad alignment.