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21 April 2020

Dear Interested Party:

The United States Coast Guard (USCG) plans to remove the Marine Railway at USCG Station Humboldt Bay, because it constitutes a safety hazard to station personnel and a hazard to maritime traffic. (See Figures 1-6 in Enclosure 1.) USCG is obligated to consider the effect of the undertaking on any historic properties in compliance with the National Historic Preservation Act and its implementing regulations. This letter invites you to consult with USCG regarding the impact of this project on historic properties.

#### Identification of Historic Properties

The Humboldt Bay Station Building and Marine Railway were constructed between 1936 and 1937, in order to support life-saving efforts after many years of shipwrecks at the entrance to Humboldt Bay (see Figures 1-2 in Enclosure 1). The Station Building and Marine Railway were listed together on the National Register of Historic Places (NRHP) in 1977, as the Humboldt Bay Life-Saving Station. Enclosure 2 provides an overview of the history and design of the Life-Saving Station and Marine Railway, and includes photographs of the Station Building and Marine Railway taken in support of a Historic American Building Survey project in 2010.

The Station Building and Marine Railway are significant under National Register Criteria A and C. The Station Building is significant under Criterion A (association with significant events) due to its local significance as part of the life-saving services and its role in assisting navigation in the vicinity of Humboldt Bay. During the period of 1937 to 1966, station personnel saved the lives of more than 300 people. Station Humboldt Bay is significant under Criterion C (embodies the distinctive characteristics of type, period or method of construction) because it is considered the best example in the western United States of the 'Roosevelt Style,' a Colonial Revival Style station design used nationally for Coast Guard stations from the 1920s to the late 1940s. Historian Ralph Shanks indicates that the Humboldt Bay Coast Guard Station is "... the apex of Coast Guard architecture" and the finest example in the United States of a station from this period<sup>1</sup>. The quality of the station's architectural detailing (door, window, porch moldings, decorative ironwork, porch brackets, etc.) is especially fine and the building exterior retains a high level of historic integrity.

The Marine Railway is one of the few surviving marine railways (which transported boats from the station to the water for launching) within the Coast Guard. First built in the early 20th century, marine railways became obsolete as the Coast Guard changed over to larger steel lifeboats in the 1970s. The only other marine railway in California is at the Point Reyes Station, now part of the Point Reyes National Seashore and no longer an operating Coast Guard station<sup>2</sup>. Further details on the construction of the Marine Railway are provided in Enclosure 2.

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1 Shanks, Ralph. 2009. Lighthouses and Lifeboats on the Redwood Coast, pg. 185.

2 Shanks, Ralph. 2009. Personal communication with Ward Hill, October 22, 2009

## Subj: REMOVAL OF MARINE RAILWAY AT STATION HUMBOLDT BAY

Need for Proposed Action

The Marine Railway is in very poor condition, with corroded steel beams and rotted planks, struts, and piles (see Figures 4-6 in Enclosure 1). It is no longer safe for anyone to access, as planks and beams have collapsed into the water. A recent waterfront inspection deemed this structure to have a high collapse potential under even a moderate wave or wind event, due to substantial deterioration of its main structural supporting members and connections.

USCG has been unable to maintain the Marine Railway to federal historic preservation standards because of the need to balance limited resources against operational readiness. Once the new boathouse was constructed, Station Humboldt Bay was forced to prioritize the Station Building and new boathouse, which support mission requirements, over the Marine Railway. Preservation of the Station Building is prioritized over the Marine Railway, as the Station Building continues to serve as the operational and administrative center for Station Humboldt Bay, while the Marine Railway has no operational value.

USCG has determined that the following reasons require removal of the Marine Railway:

1. The Marine Railway presents an indirect threat to the long-term preservation of the Station Building. The location of the Station just to the north of the entrance to Humboldt Bay exposes it to stormy weather, including waves as high as 20 feet crashing against the shoreline. While the majority of the Station is protected by various waterfront structures (a seawall, rip-rap, and a breakwater), the center section of the Station Building, which is less than 30 feet from the water, has no such protection, because of the presence of the Marine Railway. As a result, the Station Building is subject to water intrusion and exterior damage, and these conditions will be exacerbated by climate-related sea level rise. Removal of the Marine Railway would help address this concern, as once the Marine Railway is removed, USCG would be able to provide additional shoreline protection for the Station Building.
2. The Marine Railway presents a direct threat to the Station Building. A recent waterfront inspection deemed the Marine Railway to have a high collapse potential under even a moderate wave or wind event, due to deterioration of its main structural supporting members. A collapse of this structure under a large wave event could cause extensive damage to the Station Building due to debris impact.
3. The Marine Railway presents a threat to safe navigation. Collapse of the Marine Railway could result in debris floating widely in the bay, posing a risk to recreational and commercial vessel traffic. Heavy weather already breaks loose pieces of the Marine Railway, which float out into the bay and threaten navigational safety. The Marine Railway also traps floating debris, which then is wrenched about by the water, and further damages the structure. The USCG's mission to protect navigational safety would be served by removal of the Marine Railway as a hazard.
4. The Marine Railway presents a threat to USCG operations. Collapse of the Marine Railway could result in debris blocking USCG boat launches from the boat basin immediately to the north.
5. The Marine Railway presents a direct threat to the safety of USCG personnel, because it is no longer stable enough for anyone to safely access. The structure is off-limits to station personnel, but its presence in the center of the Station, adjacent to the commonly-used Station Building, creates an ongoing hazard.

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6. The Marine Railway presents an ongoing threat to the quality of the environment. When it was built, the wooden piles and struts supporting the structure were coated with creosote as a preservative, and this hazardous material is an ongoing source of pollution both to the waters of Humboldt Bay and the sediment at the bottom of the water column. Removal of this source would be in the best interests of the local marine environment.

USCG has been unable to identify alternatives which would adequately address the multiple risks posed by the existence of the Marine Railway without removing it. Leaving the Marine Railway in place without repairing it would not address ongoing risks to the environment, the Station Building, USCG personnel, and maritime safety; and restoration/stabilization of the structure would not address the threats to the environment or the interference with long-term protection of the Station Building.

Project Description

USCG is early in the planning process for the removal of the Marine Railway and has no specific methodology in place. At this point, it is assumed that the removal of the in-water section of the railway would be staged from a barge spudded down in the water adjacent to the Station.

Area of Potential Effect

Removal of the Marine Railway would have effects within a fairly limited geographic area, in that the relatively low profile of the railway prevents it from being a significant part of the historic Life-Saving Station's visual appearance. Figure 3 in Enclosure 1 shows the area determined by USCG to be the APE.

Request for Consultation

USCG is aware of the potential for adverse effects on historic properties as a result of this project. In light of this, USCG is hereby requesting your comments on this proposed action. If you have any comments or questions on this proposed undertaking, USCG welcomes your assistance. My point of contact on this issue is Constance Callahan, at 510-637-5523, or [constance.m.callahan@uscg.mil](mailto:constance.m.callahan@uscg.mil).

Sincerely,

DAVE STALTERS  
Chief, Environmental Management Branch  
United States Coast Guard  
By direction of the Commanding Officer

Enclosure: (1) Figures 1-6  
(2) Historic Significance of Station Building and Marine Railway

Copy: CG District 11 Planning (dpl)  
CG STA Humboldt Bay  
CG-09231, CG Historian

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Bear River Band of Rohnerville Rancheria, Attn: Erika Cooper

Blue Lake Rancheria, Attn: Janet Eidsness

Bureau of Land Management, Arcata Field Office, Attn: Sharyl Kinnear-Ferris

Humboldt County Planning Department, Attn: John H. Ford

Humboldt County Historical Society, Attn: Steve Lazar

Humboldt Bay Maritime Museum, Attn: Leroy Zerlang

National Maritime Historical Society, Attn: Burchenal Green

Wiyot Tribe, Attn: Theodore Hernandez