

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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April 6, 2017

Refer to HUD_2017_0306_004

Dana Mahaffey
Associate Planner
Community Development Department
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Re: Twin Rivers Transit-Oriented Housing & Light Rail Station Development Project

Dear Ms. Mahaffey:

Thank you for forwarding the above referenced undertaking to our office for review and comment pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations found at 36 CFR Part 800. The regulations and advisory material can be found at www.achp.gov.

Undertaking

You have informed us that the City of Sacramento proposes to use funds from the U.S. Department of Housing and Urban Development through the Housing Authority of the County of Sacramento to demolish the existing Twin Rivers Housing Project, historically known as the Dos Rios Housing Project, and construct the Twin Rivers mixed-use, mixed-income multifamily housing development and the Dos Rios Light Rail Station on North 12th Street in Sacramento. The proposed housing development project involves the construction of 218, replacement, public affordable housing units and 268 market rate rental units, the realignment of the internal street network, the establishment green open space, and the construction of other community amenities.

Area of Potential Effects (APE)

The City has defined the APE as the area within the two subject parcels, totaling 26.78 acres. Internally, the parcels are divided by North 12th Street, with the larger and westernmost area consisting 21.32 acres known as the "Twin Rivers Complex" and the site of the proposed housing development. The second easternmost portion of the APE is 5.46 acres and is the site of the proposed Dos Rios Light Rail Station. Our office does not object to this definition of the APE.

Identification of Historic Properties

In an effort to identify potential historic properties within the APE the City's consultant, ESA, conducted a records search with the North Central Information Center (NCIC) of the California Historical Resources Information System (CHRIS), requested at Sacred Lands File (SLF) search with the Native American Heritage Commission (NAHC), completed historical background research, desktop archeological sensitivity analysis, archeological pedestrian and

subsurface surveys of the APE, and a built environment survey and evaluation of the area. The Sacramento Housing and Redevelopment Agency (SHRA), a partner in the undertaking, conducted Native American consultation for the project.

While the results of the records search at the NWIC and desktop archeological analysis indicated a potential to encounter subsurface archeological resources, the archeological pedestrian and subsurface surveys did not result in the identification of any archeological historic properties within the APE.

The following two historic era buildings within the APE were identified, documented, and evaluated:

- The City determined that the Twin Rivers Housing Project, historically known as the Dos Rios Housing Project, is ineligible for listing in National Register for Historic Places. Based on the report prepared by ESA, the City determined that the housing development does not meet any of the significance criteria for listing in the National Register, nor does it retain integrity. The argument that the Twin Rivers Housing Project does not appear eligible for listing under Criterion A relies heavily on the fact that it was not the first public housing project developed in Sacramento, despite the fact that it opened a mere two months after its predecessor, New Helvetia (which is listed in the National Register). Though our office does not believe that an argument against the significance of Twin Rivers Housing Project under Criterion A has been made, we do agree that the property no longer retains the integrity necessary for it to convey its significance. Therefore, we concur with the City's determination that the Twin Rivers Housing Project is not eligible for listing in the National Register of Historic Places under any criteria.
- The City also determined that the building located at 401 North 12th Street, commonly known as Loaves and Fishes, is ineligible for listing in the National Register of Historic Places under any of the four criteria. Our office concurs with the determination that the building located at 401 North 12th Street is not eligible for listing in the National Register.

Finding of Effects

The City has "reached a determination of *no historic properties affected* for the Project," based on the extensive research, survey work, and consultation carried out for the undertaking. Pursuant to 36 CFR §800.4(d) the California Office of Historic Preservation does not object to a finding that no historic properties will be affected by the undertaking. However, the City may have additional Section 106 responsibilities under certain circumstances set forth at 36 CFR Part 800 in the event that historic properties are discovered during implementation of the undertaking your agency is required to consult further pursuant to §800.13(b).

The City of Sacramento's consideration of historic properties in the project planning process is appreciated. If you have questions please contact Shannon Lauchner, Historian II, with the Local Government & Environmental Compliance Unit at (916)445-7013 or by email at shannon.lauchner@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer