March 28, 2019

Oregon State Historic Preservation Office
ATTN: National Register Coordinator
725 Summer Street, N.E. Suite C, Salem Oregon

RE: Coos Bay Landmarks Commission comments regarding the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians (CTCLUSI) proposed Traditional Cultural Places District (TCP) application.

The Coos Bay Design Assistance Team serves as the City's Landmarks Commission. We appreciate the opportunity to review the TCP application. Our comments on the Evaluation sheet provided are included in this letter related to that portion of the evaluation where we have noted "concerns".

As per the requirements of the National Park Service we were only able to review and comment on the application form and within the comment guidelines. There are significant concerns the committee has with the TCP that we were not able to voice due to the required commenting criteria and process. While we do feel that the application appears complete, we feel that the implementation of the TCP is an important conversation that needs to be included in the process.

We had many questions that we discussed and felt are significant; How will the TCP be managed? What is the management process for the city and counties and how will that be funded? What role does CTCLUSI have in evaluating properties within the TCP? What rights do property owners have if a property is deemed culturally significant, what would be the intentions of the CTCLUSI? How will the designation of the TCP affect property values?

The vast majority of properties included in the TCP are along the waterfront – a culturally significant area both historically and for future development. How will this evolve over time – will the TCP grow or shrink? What if the current archeologist views a property as not culturally significant but a future one does? How will the TCP interact with existing programs like the State of Oregon Planning Goals and the Coos Bay Estuary Management Plan?

The evaluation sheet contents provided by SHPO include Commission's responses.

OK Concerns

____ _X__ INTEGRITY: Major alterations or additions? New materials? Altered setting? Moved? etc. The committee has concerns on the process for selecting the overall areas for the TCP. We are concerned about the criteria for selecting areas included and areas that were excluded (Mingus Park present and previous streambed, Mill Creek headwaters to the bay, etc.) and the overall process for determining locations of importance. Many properties within our jurisdiction have had substantial alterations over time (shoreline changes, infill locations) and may or may not continue to hold significance. There are also concerns on how properties may

be added or removed from the TCP in the future due to future culturally significance determinations.

OK Concerns

____ _X__ DESCRIPTION: Is the property adequately described? Have contributing and on-contributing features been clearly identified? As previously noted, how properties are included or not included. Concerns over substantial information redacted in the application and the committee's inability to confirm or review properties indicated in TCP.

_____ _X__ SIGNIFICANCE AND CONTEXT: Has the appropriate criterion been used? Has it been justified? Is the context sufficient in breadth and depth to support the claims of significance? The question arises: Do the areas and Tribal Members indicated in the TCP have importance beyond our region? Does the significance translate to local non-tribal history? This is difficult to determine due the redacted information, a non-redacted document would be beneficial for committee members to be able to review. How does the TCP change overtime as our views of history are constantly in motion? How are people of significance added, removed or modified as our views of history change?

_X__ ____ FACTS AND SOURCES: are the appropriate and best sources used? Are key dates and facts accurate?

_X__ ____ SUPPORTING MATERIAL: Adequate photos, maps, drawings etc?

_X___The Commission recommend that the property or properties appear to meet the National Register criteria and should be listed in the National Register.

_____The Commission recommends that the property or properties do not appear to meet the National Register criteria and should not be listed in the National Register.

We have reviewed the application and responded within the guidelines allowed but continue to have apprehension regarding implementation. Ultimately, the designation of the TCP lies in the hands of the property owners and their ability to agree with the application, express concerns, or disagree.

On behalf of the Design Assistance Team

Sincerely,
Ariann Lyons
City of Coos Bay Design Assistance Team Chair
(Local Historic Perseveration Commission)