



AGENCY: City Council
MEETING DATE: July 25, 2022
DEPARTMENT: Community Development
PRESENTED BY: Marie Jones Consulting
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AGENDA ITEM SUMMARY

TITLE:

Receive Report and Provide Direction Regarding Options for Preserving Eagles Hall as a Public Assembly Venue, Including Historic Landmark Status, Existing Zoning Regulations and Other Options

ISSUE:

Eagles Hall has served the Fort Bragg community as an event facility since 1914. The building is in escrow for purchase, and the City Council expressed an interest in learning about how the building might be secured as an event facility going forward by designating it as a Historic Landmark.

ANALYSIS:

Facility Description

Eagles Hall is approximately 150 feet long and 110 feet wide (6,700 sf), and is two stories high. It currently houses a large performance space, a yoga/dance studio, a commercial kitchen, and several bathrooms. The property also includes a 2br/1ba residence on an adjoining parcel. Please see Attachment 1 to view photos of the Hall.

Marie Jones Consulting (MJC) completed a site inspection of the exterior of the Hall and overall the building appears to be in fair condition. The following concerns were identified:

- The east (back) of the building was badly repaired in multiple locations and appears to have some rot damage.
- The north and east side of the building are badly in need of paint and some corrective siding.
- The south wall sags outward. A review of historic pictures indicates that this is a long-standing condition.

Eagles Hall History

In 1914, the Finnish community constructed Eagles Hall at 210 N Corry Street in Fort Bragg for Finnish plays and other events. Over the past century, the building has served as a multi-purpose event, meeting and political organizing space under various names and ownership.

- **As Toveri Tupi** (Comrade Hall), the Finns owned and managed the venue for concerts and dances. The community at large used the building for dances/balls, fundraisers, funeral services, plays, wedding receptions, and as a polling place. Meetings were held by Farmers Mutual Fire Insurance Company, Noyo Fisherman's Association, and Fort Bragg Co-Operative Mercantile Corp. In 1933 the venue provided a platform (15 cents admission) to "hear the truth" from Lester Carter ("one

of the white boys on the train; an important defense witness”), and Mrs. Jane Patterson (“mother of one of the convicted boys”) of the infamous Scottsboro trial (in which nine black teenagers were falsely accused of raping two white women aboard a train in Alabama). The facility was managed by the Finns up to WWII.

- **As I.W.O. Hall**, the International Workers Order, Redwood Lodge No. 3893, became the proprietor of the building, shortly after the U.S. entered WWI. Many important local labor efforts were undertaken from this building, including: 1) a meeting of Noyo Fishermen’s Union No. 40 and a redwood industry strike that began in 1946.
- **Fort Bragg Labor Temple**. On June 8, 1946, the building was dedicated as Fort Bragg Labor Temple for trade unions and served as a venue for the Strike and Policy Committee. Meetings included the Carpenters Union, Fishermen’s Union, Lumber and Sawmill Workers Union, Bartenders and Culinary Workers Union, Alcoholics Anonymous, and the Salmon Trollers Marketing Association. There were also social events – dances, plays, Bingo, wedding anniversaries, basketball games, etc.
- **Eagles Hall**. The Fraternal Order of Eagles, Fort Bragg Aerie No. 833, was organized on November 10, 1904. In 1959, they began using the building, officially recording ownership on January 1, 1960 and over the years it has hosted cultural and political events, dance recitals, concerts, weddings, graduations and more.

While this staff report explores the feasibility and benefits of designating Eagles Hall as a landmark, it should be noted up front that Landmark Designation is concerned with the exterior appearance of the building, not the internal configuration or use of the building. The reuse of Eagles Hall for an alternative use may however be limited by zoning and parking requirements, and the influence of these are also described. The analysis turns first to an exploration of the benefits of landmark designation and secondly to limitations for reuse due to zoning and land use regulations.

1. Landmark Status

Eagles Hall is currently listed on the City of Fort Bragg’s historic building inventory. To be listed on the City’s Historic Register per Section 18.74.020B the building must be:

1. Listed in the National Register of Historic Places (either individually or as contributing to a district);
2. Designated as a Historic Landmark District by the City Council per FBMC Section 17.74.030;
3. A property contributing to a district listed in the National Register of Historic Places; or
4. A property identified through a historic resources survey as qualifying for a historic designation.

Eagles Hall was identified through a historic resources survey as a property qualifying for a historic designation.

Effect of Historic Landmark Designation

Once a building is on the local Historic Register as a Historic Landmark, it places additional regulatory requirements and benefits on any existing or future owner who may choose to modify or demolish the building now or in the future.

Benefits of Landmark Designation. Benefits include the following, per 18.74.010(B): 1) use of historic building codes; 2) waiver of development code ILUDC standards; 3) approval of land use not otherwise allowed; and 4) various federal tax and mortgage incentives. The waiver of land use standards (such as parking and set back requirements) and the possibility of the City Council approving uses that are not otherwise allowed in the district are very powerful tools that would make reuse of this building feasible for any number of alternative uses.

The Planning Commission or City Council have the responsibility for determining if a specific ILUDC standard should be waived or if a land use otherwise not permitted in the zoning district could be allowed through a publicly noticed public hearing. In either case these incentives are only permissible if the property owner is undertaking a significant rehabilitation of the building. If incentives are approved, the Council or Commission must first make the following findings (18.74.080 (E) 2 a & b):

- a. Findings for all incentives.
 - i) Each incentive to be granted serves to compensate the property owner for the increased burden, in terms of maintenance and expense, that the rehabilitation would entail;
 - ii) No approved incentive would impair the aesthetic, architectural, or historic integrity of the resource; and
 - iii) No proposed incentive would be detrimental to the public health, safety, or general welfare.
- b. Findings for adaptive reuse. In addition to the above findings, the review authority shall first make the following findings before granting approval of an adaptive reuse:
 - i) The change of use would occupy no more floor area than the original use;
 - ii) The proposed use would not significantly impair the physical character of the area in which it is located; and
 - iii) The change of use would result in substantial restoration of the significant and architectural features or exterior architectural appearance of the resource, and/or will result in a maintenance plan that will ensure the upkeep and continued maintenance of the resource over the expected life of the project.

The City Council and the Planning Commission can decide on a project by project basis whether to grant incentives or adaptive reuse waivers.

Requirements of Landmark Designation. Additionally, the landmark designation places the following requirements on current and future property owners:

1. **Certificate of Appropriateness is required.** A COA is required for the alteration, demolition, moving, or removal of any landmark or structure designated on the City's Historic Register, any individual historic resource, or any contributing historic resource within a historic district, and for any alteration, demolition, moving, or removal of any potential historic resource identified through the City's review of a land use and/or development permit application or CEQA review, by the City, any agent of the City, or a private party.

A COA is required for any permit or any work otherwise altering the exterior architectural features or appearance of the resource. Where alteration is defined as "any act or process, through private or public action, that changes the specified character defining a historic resource or significant physical feature or architectural appearance of the exterior of a historic resource, including additions, new construction, reconstruction, or removal of any

resource.” In review of a Certificate of Appropriateness, the review authority must use the following Criteria:

- a. In evaluating a COA application, the review authority shall use any applicable design guidelines and the Secretary of the Interior’s Standards for Rehabilitation and shall consider the factors (e.g., the existing and proposed architectural style, arrangement, color, design, materials, and texture to be used) with regard to the original distinguishing architectural characteristics of the historic resource.
- b. In addition, the Director may require that the proposed work be reviewed by a preservation architect.
- c. Wherever feasible, the State Historic Building Code (SHBC) and the Uniform Code for Building Conservation (UCBC) shall be used in allowing any alteration to a historic resource.

Thus, the Landmark designation and the resultant a Certificate of Appropriateness are focused on the exterior of the building. They do not limit interior modifications.

Additionally, in the review of a COA the Planning Commission would need to make the following findings in order to approve a Certificate of Appropriateness to make modifications and/or improvements to Eagles Hall.

- 1. Alterations, generally.** A COA shall be issued for a proposed alteration only if the review authority first finds that:
 - a. The proposed work will neither adversely affect the significant architectural features of the historic resource nor adversely affect the character or historic, architectural, aesthetic interest, or value of the historic resource and its site;
 - b. The proposed work conforms to any prescriptive standards and design guidelines adopted by the City for the particular resource, and to the Secretary of the Interior’s Standards for Rehabilitation, and does not adversely affect the character of the historic resource; and
 - c. In the case of construction of a new improvement upon a historic resource property, the use and design of the improvement shall not adversely affect, and shall be compatible with, the use and design of existing historic resources within the same historic district.

Eagles Hall currently qualifies as a Historic Landmark, and the property owner may apply for incentives or a use (that is not otherwise allowed in the zoning district) if they undertake a major rehabilitation of the building. Likewise the property owner could apply for a COA to modify the external look of the building, however a COA is not required for internal modifications or a normal change in use for the property.

State Historic Resource Designation

The State Historic Preservation Office (SHPO) could be asked to review the historic status of Eagles Hall to determine if the building is eligible for listing on the State registry. To be eligible for designation as a Landmark, a resource must meet at least one of the following criteria:

1. The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
2. Associated with an individual or group having a profound influence on the history of California.

3. A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

It is not clear that Eagles Hall would qualify as a Historic Resource under any of these criteria. Additionally, State Historic Resource Designation would only control external changes to the building, not occupancy, use, or any internal modifications to accommodate different uses.

2. Zoning Limitation and Considerations

If City Council or the Planning Commission does not make the findings required to grant incentives or use exceptions, the City’s ILUDC does includes a number of requirements which could limit the reuse of the building. The property is zoned medium density residential which allows for “limited, neighborhood serving commercial uses on small, appropriately located individual parcels, or as small, pedestrian-oriented neighborhood centers.”

Residential Use. The maximum allowable residential density within the RM district ranges from 6 to 12 dwelling units per acre. Eagles Hall is located on two separate parcels. The primary building is located at 210 Corry Street which is 8,190 SF and the single-family residence is located at 651 Alder Street on a 6,750 SF. Both parcels together are 14,840 SF which is 0.34 of an acre. At 6 to 12 dwelling units per acre, the combined parcel could accommodate up to 4 residential units.

Maximum Development. Within the RM district, the maximum allowable floor area ratio (FAR) for nonresidential uses is 0.40. The non-residential uses on 210 Corry parcel are currently built out at an FAR of 0.8 and constitute a legal non-conforming structure. If the parcels were merged into one parcel, the FAR of the total site is 0.53, which is still legal non-conforming.

Use Types Permissible. The Use Tables of the ILUDC specifically list the following permitted uses in this zoning district:

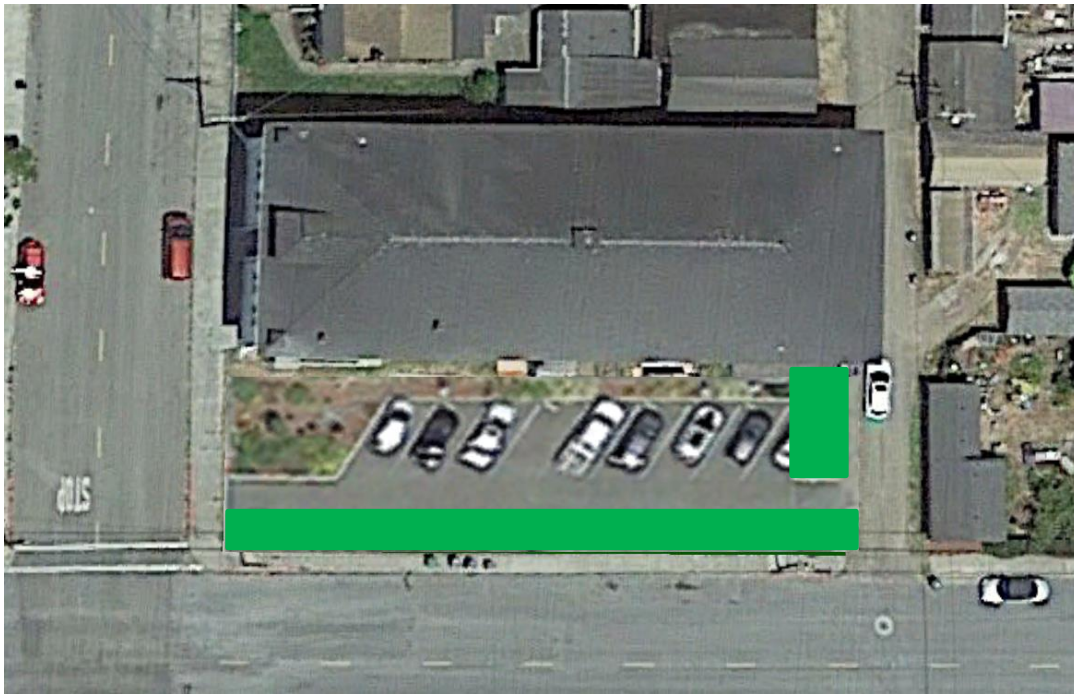
Permitted	Park, playground; School – Public; Condominium conversion - 3 units maximum per parcel; Multifamily housing - 3 units; Second unit – ADU/JADU; Tiny homes; Single residential unit Home occupation; Accessory retail and services; Office – Accessory; Day care child - Small family day care home.
Minor Use Permit	Private residential recreation facility; Day care, adult - 6 or fewer clients; Day care child - Large family day care home; Day care child - Day care center.
Use Permit Required	Meeting facility, public or private, School – Private, Multifamily housing 4 or more units, Co-housing 4 or more units; Organizational housing/care facility (sorority, monastery, residential care, etc.) of more than 3,000 SF or 3 units; Residential care facility for the elderly (RCFE). Artisan shop; Neighborhood market; Restaurant, cafe, coffee shop. Medical services - Clinic, lab, urgent care; Medical services - Doctor office; Medical services - Extended care; Day care, adult - 7 or more clients; Personal services; Public safety facilities.

Eagles Hall does not currently provide parking, and this is a legal non-conforming condition. So long as the property is used as an event space and meeting hall, uses which were

adopted prior to the adoption of Land Use Planning, the parking need not comply with the City's current zoning ordinance.

However, changing the use to a new use type (residential, commercial, etc.) could trigger compliance with the City's parking requirements (18.36.020A and 18.36.040 A.1.e). Additionally, the ILUDC requires that parking for a use be located on the same parcel as the use (18.36.090 A 1&2). Therefore, any proposed change of use for this facility would require a parcel merger of the two parcels and the provision of the appropriate amount of parking for the proposed uses.

651 E Alder Street is a small parcel and could provide up to 8 parking spaces if the existing residential unit and mid building ADA ramp were removed. The ILUDC requires: 1) an 8-foot landscaping setback for parking that is adjacent to an existing structure; 2) a 10 foot side street parking setback abutting Alder Street; and 3) a front yard parking setback of 25 feet (see 18.34.050 C.4. a.ii, b & c). The image below illustrates that an eight space parking lot may be feasible, although exact measurement have not been made.



The Director of Community Development may waive parking requirements, at his/her discretion, for a non-conforming structure proposed for rehabilitation (18.36.040 C.3). The intent of such a waiver is to ensure that buildings may be rehabbed for appropriate reuse in situations where strict conformance with the parking requirements would result in prohibiting the rehabilitation of a building for a new use.

Both the current zoning and the parcel size appear to provide an avenue for a four-unit (2-bedroom each) apartment and associated parking to fit on the project site and in the Eagles Hall building. Other reuse scenarios are also possible, although not explored in this analysis.

The relative difficulty of providing parking for the large Eagles Hall building on the relatively small parcel, means that uses which require more parking (such as restaurant, café, coffee shop, medical office, schools and day care facilities) are unlikely to fit on the site, given the lack of space to accommodate the parking requirements (unless such requirements are waived with a Minor Use Permit or for building rehabilitation.)

Thus, absent City Council's approval of either a development standard waiver and/or a use exception due to major rehabilitation of this landmark, the most likely uses of this building would be as a public assembly building (with its pre-existing legal non-conforming status) or an apartment building with four units of about 1,500 sf each and the associated 8 parking spaces.

Alternatively, to control the use of this building, the City could explore the feasibility of acquiring the building for a non-profit or other public benefit purpose. The City could also explore the legality of revising its landmark regulations to limit internal modifications to the structure.

RECOMMENDED ACTIONS:

Receive report and provide direction to staff.

ALTERNATIVE ACTION(S):

Receive report and take no action.

FISCAL IMPACT:

No fiscal impact.

GREENHOUSE GAS EMISSIONS IMPACT:

Not applicable.

CONSISTENCY:

See above analysis.

IMPLEMENTATION/TIMEFRAMES:

Not applicable.

ATTACHMENTS:

1. Photo essay

NOTIFICATION:

1. City of Fort Bragg Planning Commission