

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

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March 18, 2015

Reply to HUD 2015_0223_002

Jennifer Owen
Housing & Economic Development Coordinator
City of Fort Bragg
416 North Franklin Street
Fort Bragg, California 95437

Dear Ms. Owen:

Re: Acquisition & Rehabilitation Project Located 101 North Franklin Street, Fort Bragg

Thank you for forwarding the above referenced undertaking to my 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.ac hp.gov.

Pursuant to 36 CFR §800.4(d) I do not object to your determination that no historic properties will be affected by the undertaking. However, your agency may have additional Section 106 responsibilities under certain circumstances set forth at 36 CFR Part 800. For example, in the event that cultural or historical resources are discovered during implementation of the undertaking your agency is required to consult further pursuant to §800.13(b).

Your 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 Unit at (916)445-7013 or by email at Shannon.lauchner@parks.ca.gov

Sincerely,

A handwritten signature in cursive script that reads "Carol Roland-Nawi for".

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer



CITY OF FORT BRAGG

Incorporated August 5, 1889
416 N. Franklin Street
Fort Bragg, CA 95437
Phone: (707) 961-2823
Fax: (707) 961-2802

February 20, 2015

Shannon Lauchner, State Historian II
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Subject: Request for Concurrence on City of Fort Bragg's Finding of No Significant Impacts on Historic Resources for Activities Funded by Community Development Block Grant #14-CDBG-9881

Dear Ms. Lauchner:

The City of Fort Bragg was awarded a grant from the State Community Development Block Grant (CDBG) program to fund acquisition and minor rehabilitation activities subject to environmental review per the National Environmental Policy Act (NEPA). To complete the necessary NEPA documentation, the City is consulting with the State Historic Preservation Officer to request concurrence with its determination that the activities will have **no adverse effects on historic resources**.

The following project information is provided per the Section 106 Consultation Submittal Checklist to facilitate your review of this project:

Section 1: General Information About the Undertaking

This is a new undertaking. This activity is funded by the State CDBG program which has provided \$1,162,791 for acquisition and rehabilitation of a public facility that will provide a variety of homeless and mental health services. The CDBG grant was awarded to the City of Fort Bragg, and the acquisition and rehabilitation will be performed on behalf of the Mendocino Coast Hospitality Center, a 501(c)3 non-profit organization that will own and operate the public facility. CDBG activities are subject to NEPA environmental review including SHPO consultation per 36 CFR Part 800.

The address of the proposed facility subject to this review is **101 North Franklin Street, Fort Bragg, California 95337 (Mendocino County)**. The property is known as the Old Coast Hotel, and the grant activity is known per the grant application as the HOPE Project, a homeless facility acquisition/rehabilitation activity. Throughout this document, the project will be described as the Old Coast Hotel or OCH project. The Old Coast Hotel is on the City's Historic Building List. A record search performed by the California Historical Resources Information System's Northwest Information Center (NWIC) determined that there have been no cultural resource studies of the project area and there are no recorded

archaeological resources. Per the NWIC report, the Old Coast Hotel is listed with a 7W status code (submitted to OHP for action – withdrawn), and there are no other recorded buildings or structures within the project area. The building has been the subject of extensive and frequent remodeling, additions, conversions, and refurbishing since original construction. Because current rehabilitation needs are minimal and occur primarily on interior portions of the building that have been substantially reconstructed within the past 20 years, activities are not expected to have adverse historical impacts on the property or the APE.

Section II: Contact Information

The City of Fort Bragg is the CDBG grantee. The City contact for the CDBG grant is Jennifer Owen, Housing and Economic Development Coordinator, 416 N Franklin Street, Fort Bragg, CA 95437; phone (707) 961-2827 extension 109, fax (707) 961-2802; email jowen@fortbragg.com.

The City of Fort Bragg grant subrecipient for this undertaking is Mendocino Coast Hospitality Center, Inc. a 501(c)3 non-profit organization. The City's primary contact at this organization is Anna Shaw, Executive Director, P.O. Box 2168, Fort Bragg, CA 95437; phone (707) 961-0172, email anna@mendocinochc.org.

The state agency responsible for the grant is the CDBG Program, a division of the State Department of Housing and Community Development. The City of Fort Bragg representative for this grant program is Max Emami, CDBG Contract Management Staff, 2020 W. El Camino Avenue, Suite 500, Sacramento, CA 95833; phone (916) 263-1679, email max.emami@hcd.ca.gov.

Section III: Description of Undertaking and Area of Potential Effects (APE)

A. Project Description:

The acquisition/rehabilitation activity is in support of the Mendocino Coast Hospitality Center (MCHC), a Fort Bragg non-profit 501(c)3 organization that is the primary provider of comprehensive adult homeless services on the Mendocino Coast. MCHC currently provides homeless and mental health case management, resources, Wellness Center, and administrative services from two cramped rental units located in a Fort Bragg strip mall. A 2014e State CDBG grant was awarded to fund acquisition and minor rehabilitation (as necessary to provide proposed services) of a new public facility to provide additional and more appropriate space for homeless services. The proposed facility will provide amenities that are not available in the current facility including a client waiting and reception area, private consultation rooms, accessible restrooms, meeting space, vocational training spaces, and offices. In addition, the new facility is proposed to provide space to co-locate homeless services with the new Mental Health Access Center, in order to facilitate and improve client access and to ensure proximate support for mental health staff. The new facility will provide at least 5 units of transitional housing in upstairs units as allowable per the zoning code.

Current interior and exterior photographs of the Old Coast Hotel are provided in Attachment 11.

The non-profit MCHC has entered into a Purchase Option with the owners of the property known as the Old Coast Hotel located at 101 North Franklin Street. The Option price is \$900,000, a significant discount from the current list price for the Old Coast Hotel (OCH) of \$2.9M. This purchase price allows a remainder grant amount of up to \$262,791 for acquisition closing costs and rehabilitation final planning and implementation. The OCH most recently operated as a 15-room motel with full service restaurant and bar. The OCH has been vacant for several years. The last reported Transient Occupancy Tax was recorded in 2010, and there have been no reported restaurant/bar sales since 2008. The facility has been for sale for at least 8 years.

The OCH is a 12,000 square foot facility located on a 15,000 SF lot on the southern border of the City's Central Business District. The current building footprint was extensively remodeled in 1990 and 1996. Improvements installed in 1990 included conversion of a storage area at the rear of the property to offices; roof repair, siding repair, and window replacements. A **1996/1997 major remodel and refurbishing** project was valued at over \$1M and included:

- Conversion of storage and garage areas at the rear of the property into 3 guest rooms and laundry area including new building foundations;
- Addition of a second story on a rear unit to add 4 guest units including an accessible unit, and including new building foundation;
- Installation of fire sprinkling and alarm system in the restaurant, bar, and 6 upstairs guest rooms;
- Installation of window awnings;
- Bar remodel,
- Kitchen upgrade,
- Restoration of tin walls and ceilings in the main building guest areas;
- Electrical, plumbing, and Ethernet installations and upgrades;
- Construction of enclosed patio area including wooden stairway to alley units; construction of wooden deck and gazebo on cement pads; installation of cement fountain, planting beds and sidewalks; and landscaping, and perimeter fencing.

The facility is in excellent condition despite the extended period of vacancy. The existing facility construct will substantially meet the needs of the proposed homeless services use. Commercial kitchen equipment is included in the selling price, which will provide ready space for future vocational training programs. Bar equipment including liquor license is not included with the sale, and this space will be re-purposed for meeting and training space. Hotel rooms upstairs are configured appropriately for transitional housing. Current zoning allows commercial/office usage downstairs and housing upstairs, so the new owners will use the downstairs spaces for services and limit housing to upstairs units.

As noted, **current** rehabilitation needs are relatively minor. Exterior work is expected to consist the following:

- Re-painting of walls and trim in current colors;
- Repair of 4 existing window canopies;
- Removal of metal roll-up delivery door located on southern Oak Street side of the facility and re-sealing of wall to restore the exterior wall to its original appearance.

Interior work is expected to consist of the following:

- Installation of partitions including walls and false roof to create 3 private cubicles in the former dining room; existing tin ceilings will not be impacted;
- Installation of a door between the existing bar and the dining room to reduce noise;
- Conversion of one of six existing hotel rooms above the main Franklin Street portion of the facility to a communal kitchen to serve the 5 transitional housing units located in this wing. The kitchen will include sink, oven/range, refrigerator, and associated electrical and plumbing upgrades;
- Conversion of a storage closet to a kitchenette (including plumbing for sink; electrical installation as needed for microwave and small refrigerator);
- Conversion of 4 rear hotel rooms to offices (no construction anticipated)
- Installation of fire sprinkling per City code to 9 rooms (2 office spaces and 7 hotel rooms) located in the west alley-facing wing of the facility and in the south-west offices that face Oak Street. These rooms were constructed in 1996 through conversion of former storage units and addition of a second story to a rear building. There are existing fire sprinkling systems in all other areas of the facility.

- Expansion of Ethernet to manager's apartment in upstairs rear unit and 2 existing office areas in rear portion of property;
- Installation of key-pad locks on exterior and interior access doors;
- Removal of hostess station;
- Installation of security and surveillance system;
- Solid covering to replace slatted cover on existing outside wooden pagoda structure.

No alternations are planned to the existing enclosed fenced patio area except the solid cover over the pagoda; no landscape alterations are contemplated, and no earth-disturbing activities will occur. All rehabilitation will be designed and implemented to be as consistent with current architecture as possible and to minimize impacts on historical aspects of the building.

B. A Project Location Map showing location of the city of Fort Bragg in California is included as Attachment 1. A map showing the project location within city limits is included as Attachment 2.

C. Narrative APE Description

Determination of APE. The Area of Potential Effects (APE) for the project is pictured on Attachment 3. The APE was determined with consideration of existing uses, proposed uses, and proposed rehabilitation impacts on the APE including vehicular and foot traffic; visual impacts; auditory effects, and public access. The Old Coast Hotel is located on a 12,000 square foot lot (APN 008-162-15-00); as shown on APN Location Map (Attachment 4) on the corner of North Franklin Street and Oak Street, on the southern boundary line of the City's Central Business District. The Old Coast Hotel is bordered on the north by a multi-family residential structure; on the west by an alley across which is a new utility building adjoined by a vacant parcel; on the south, by a multi-family residential building with one commercial unit; and on the east by a commercial print shop and financial institution (credit union). Due to the vacant lot to the west of the Old Coast Hotel, the view impacts properties located to the west on Main Street. Street view photographs of buildings within the APE are provided in Attachment 5.

Consideration of land use changes: Although the Old Coast Hotel is currently vacant, proposed mixed-used commercial and residential use for offices, meeting areas and housing units is considered a consistent use per the Fort Bragg Land Use and Development Code (Inland), as compared to prior use as hotel, restaurant and hotel. The proposed use is permitted by right; no use permit is required.

Consideration of traffic impacts: The proposed use of Old Coast Hotel will house approximately 15 employees during daytime business hours; up to 2 employees overnight; up to 5 individuals or families in transitional housing units; and up to 60 client visitors per day at various periods throughout the business day for appointments and activities. The proposed staffing and client levels are estimated to be comparable to prior hotel, restaurant and motel staffing levels including guest visitation for the most recent hotel operation of 15 guest rooms. Employee parking is limited for the proposed use, as it was for the prior use; the Old Coast Hotel offers a 3-space parking lot with one accessible space in the rear alley. The City currently waives parking requirements in the central business district for all businesses, so no parking mitigation is required or imposed by the City related to the purchase of the OCH. Traffic and parking congestion in the 100 block of North Franklin Street has recently been impacted by merger of two credit unions into one facility located at 120 North Franklin Street. The credit union currently has 11 spaces accessible only through an alley entry and exit. However, existing congestion will be substantially mitigated with the credit union's construction of an additional 15-space parking lot with a Franklin Street entry and alley exit, on a parcel adjacent to the credit union on Franklin Street. Demolition permits for an existing building on the parking lot site have been pulled by the credit union, and construction is expected to occur within the next year.

Traffic and parking impacts related to proposed use of the Old Coast Hotel (MCHC clients) will be mitigated by an assumed reduced rate of car ownership by homeless clients as compared to prior restaurant, bar and hotel use. Traffic and parking impacts generated by staff will be mitigated by encouraging staff members to use alternative forms of transportation such as bicycles. Traffic related to rehabilitation is anticipated to be minimal, and the existing parking area located at the rear of the Old Coast Hotel is adequate for construction staging. Exterior work should not result in traffic impacts due to street blockages; temporary sidewalk blockage may occur, and foot traffic would be diverted to an existing sidewalk across the street during any sidewalk closures.

Consideration of visual impacts: The proposed facility is in excellent condition. As described above, minimal exterior work will occur to the facility except to maintain and improve the existing exterior. Several buildings neighboring the hotel, including structures directly to the south; diagonally to the south-east; directly across the street to the east; and the rear building directly to the north are in substandard condition, and 3 of these 4 buildings have been the subject of recent code enforcement activity by the city of Fort Bragg due to substandard appearance and conditions (see residential structures visible in Attachment 5, View 6 and View 9). Mendocino Coast Hospitality Center, the proposed buyer of the Old Coast Hotel, owns two other facilities in Fort Bragg that demonstrate excellent care and condition, and there is an expectation, as will be enforced through the City's authorizing loan agreement with the proposed buyer, of on-going maintenance so the proposed facility will be maintained in its current condition into the future. As a result, it is anticipated there will be no negative visual impacts created by the acquisition/rehabilitation.

Consideration of auditory impacts: Per the proposed use, clients may gather in the outdoor, enclosed courtyard, which is bordered on the north by a multi-family residence and otherwise encircled by the Old Coast Hotel structure. Clients will only have access to the courtyard during normal business hours (Monday through Friday, 8am until 5pm), so impacts on neighboring residents are expected to be consistent with prior uses. Residents of transitional housing units may have courtyard access after regular business hours, but noise levels will be monitored by an on-site resident manager. On-going activities at the proposed facility will occur primarily inside the facility during normal business hours and always under the supervision of staff, so negative impacts to the surrounding neighborhood are not anticipated. Rehabilitation work will primarily occur on the interior of the facility during normal business hours, and sound is not expected to carry outside of the building to impact anyone outside the facility.

Consideration of public access: The Old Coast Hotel has been closed and vacant for over 5 years, so physical public access by the public to the restaurant, bar or hotel rooms has been blocked. After the proposed purchase, clients, staff, and residents will have access per proposed uses. Other APE physical access will not be changed by the proposed uses.

D. Section IIIA: Ground-Disturbing Activity: There will be no ground-disturbing activities.

E. Section IV: Efforts to Identify Historic Properties

1. **Archival research.** The City requested a record search from the California Historical Resources Information System's Northwest Information Center. Results of the records search (NWIC File No. 14-1059 correspondence dated February 16, 2015) as well as the City's request for information is provided as Attachment 6. This correspondence indicates the following:
 - There have been no cultural resources studies of the 101 N. Franklin Street project area.
 - The project area contains no recorded archaeological resources.

- The Old Coast Hotel is listed in the OHP HPD with a 7W status code: submitted to OHP for action – withdrawn.
 - Other than the above, the NWIC base maps show no recorded building or structures within the project area.
 - There are no Native American resources in or adjacent to the project area.
 - The project area is located on the coastal margin with high potential for unrecorded Native American resources within the project area.
 - There is high potential that unrecorded historic-period archaeological resources are within the project area.
 - There may be unrecorded buildings within the project area that meet the OHP minimum age standard of 45 years or older, with potential historical value.
2. **Native American Consultation.** The City consulted with the Cultural Resource Specialist of the Tribal Historic Preservation Office, Sherwood Valley Rancheria regarding the project in order to identify Native American Resources. The City’s correspondence to and response received from Misty Cook, cultural Resource Specialist, is included as Attachment 7. The Native American consultation notes that the entire Mendocino Coast is sensitive and contains many cultural/ archaeological resources, so any unforeseen ground disturbing activities may require further consultation. The Old Coast Hotel project will not result in ground disturbing activities.
3. **Other consultations.**
- a. **City records:** City staff reviewed the City’s Historic Buildings Inventory to identify historic properties in the APE. This inventory was prepared in 2008 by local historians and provides dates of original construction and reconstruction/major rehabilitation, when available, for a properties that are potentially historic that are generally located within the Central Business District. An extracted list of Historic Properties in the neighborhood blocks that comprise the APE is included as Attachment 8. The list includes thirteen properties of potential historical significance in addition to the Old Coast Hotel. Pictures of these properties are included as Attachment 10. Of buildings on this list, five are dated around the period of the Old Coast Hotel’s initial construction (1890 to 1910), and of these, 4 of 5 have been substantially remodeled since original construction.
 - b. **Fort Bragg-Mendocino Coast Historical Society.** The City consulted with David Foucheaux, representative of the Mendocino Coast Historical Society, to collect additional historical information about the property. Correspondence including copies of maps and a historical photo are included as Attachment 9. Mr. Foucheaux’s review shows that:
 - A building was originally constructed at the site after 1890 and by 1894 within a single-width parcel with an east-west orientation;
 - A building north of the OCH was present in 1894 and absent in 1898, and the OCH had expended to take up a double lot along Franklin Street and converted to a north-south orientation along Franklin Street by 1909.
 - It appears that the building that was to the north of the OCH in 1894 was moved to the north side of the expanded north-west oriented building by 1909.
 - In 1901, a local newspaper article dated Oct. 30, 1901 stated that work had commenced on a building at the Oak & Franklin Street location that was to be “75’ by 36’ and 3 stories high” when completed.
 - By 1941, the OCH had expanded west along Oak Street and across the back of the double parcel to incorporate former out-buildings and form one contiguous, u-shaped structure.

- It is unknown when the 3rd story of the building that was part of the 1901 construction and is visible in an undated photograph, was removed. The current structure is 2-stories.

F. Section V: Finding of No Adverse Effect

Based on the above information, we have determined that the activities proposed for the Old Coast Hotel located at 101 North Franklin Street will result in no adverse effect to the property or APE pursuant to 36 CFG Part 800.5(b) for historic resources.

Thank you for your attention to this request. The City is anxious to proceed with the grant funded activities, and we are hopeful that you will concur with our determination that these activities do not have the potential to adversely affect historic resources. Please do not hesitate to contact me should you have any questions.

Sincerely,



Jennifer Owen
Housing & Economic Development Coordinator

Enclosures: see List of Attachments for details

cc: CDBG Public Information File

City of Fort Bragg

SHPO Consultation for 101 N. Franklin Street, Fort Bragg, CA (Old Coast Hotel)

List of Attachments

Attachment 1: Map showing location of City of Fort Bragg within State of California

Attachment 2: Map showing Project Location within City of Fort Bragg

Attachment 3: APE Map

Attachment 4: APN Map with Old Coast Hotel location highlighted

Attachment 5: Street Level Photos of APE neighborhood

Attachment 6: CHRIS Records Search Results from Northwest Information Center dated 2/16/2015 and City request for information with attachments.

Attachment 7: Native American Consultation response dated Feb. 23, 1015 and City's request for consultation with attachments.

Attachment 8: Extract from City Historical Building Inventory – Buildings Located within the APE

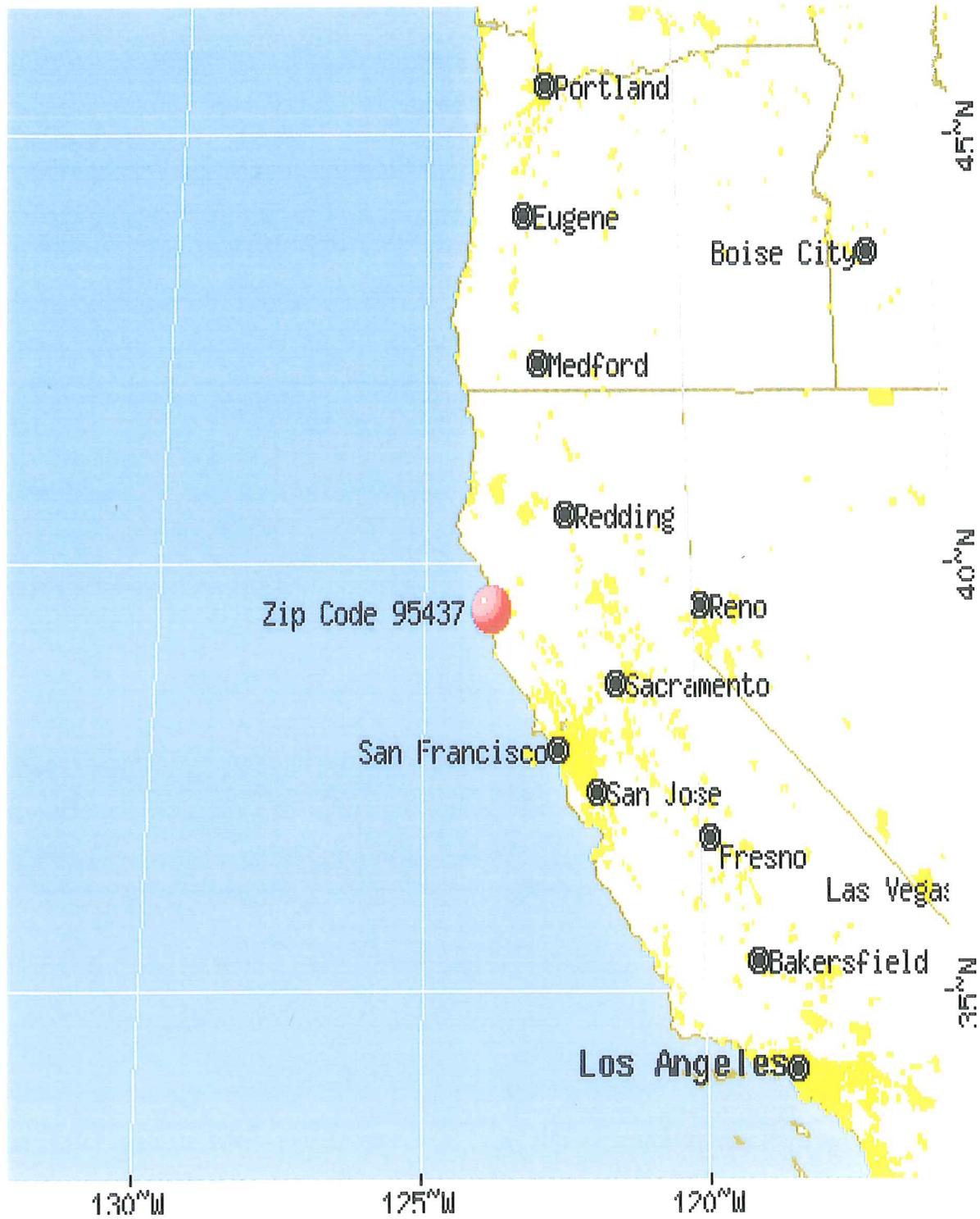
Attachment 9: Correspondence from Fort Bragg-Mendocino Coast Historical Society Member

Attachment 10: Pictures of Properties Listed in Attachment 8

Attachment 11: Additional pictures of Old Coast Hotel

ATTACHMENT 1

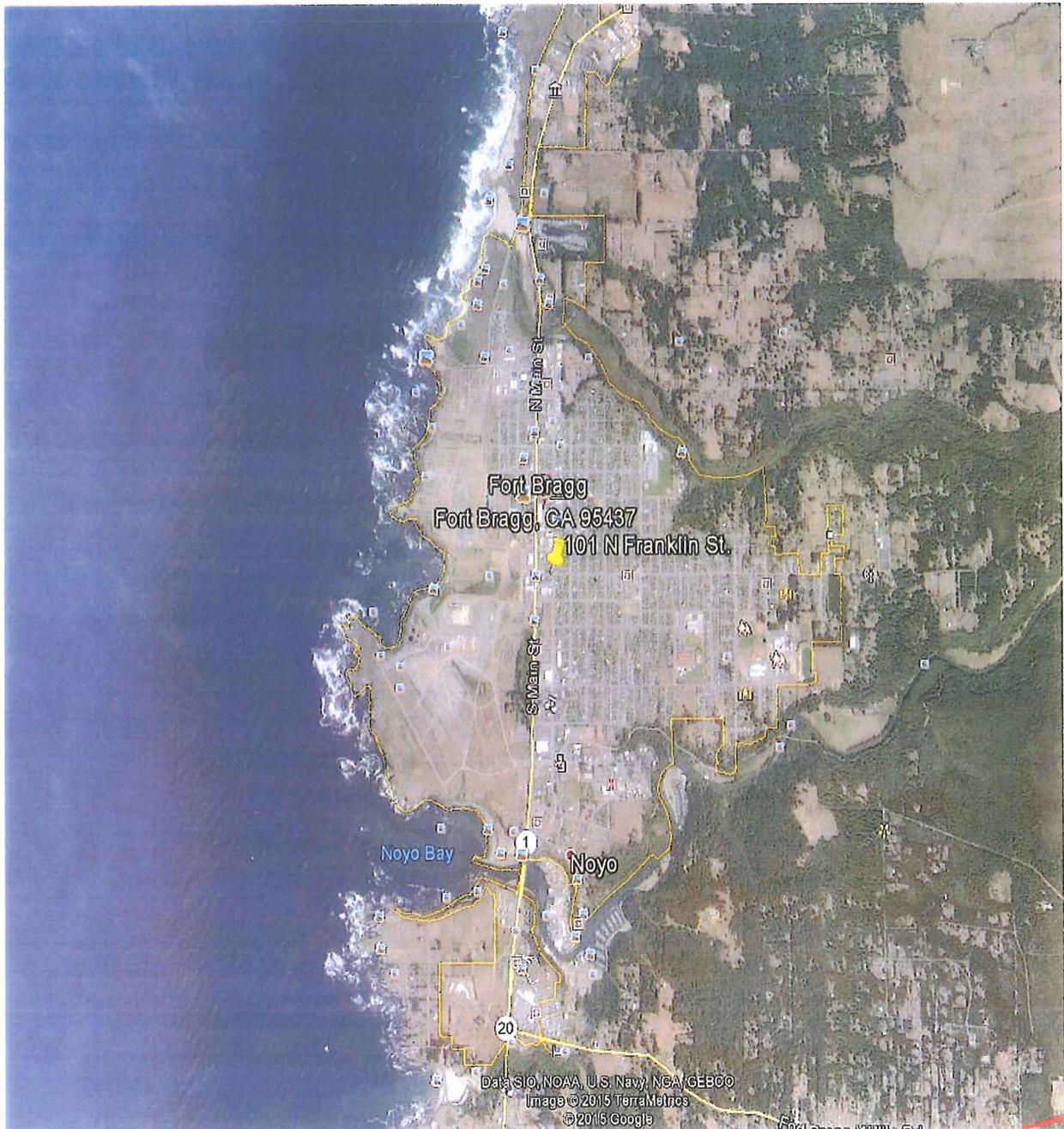
Map showing location of the City of Fort Bragg in California:



ATTACHMENT 2

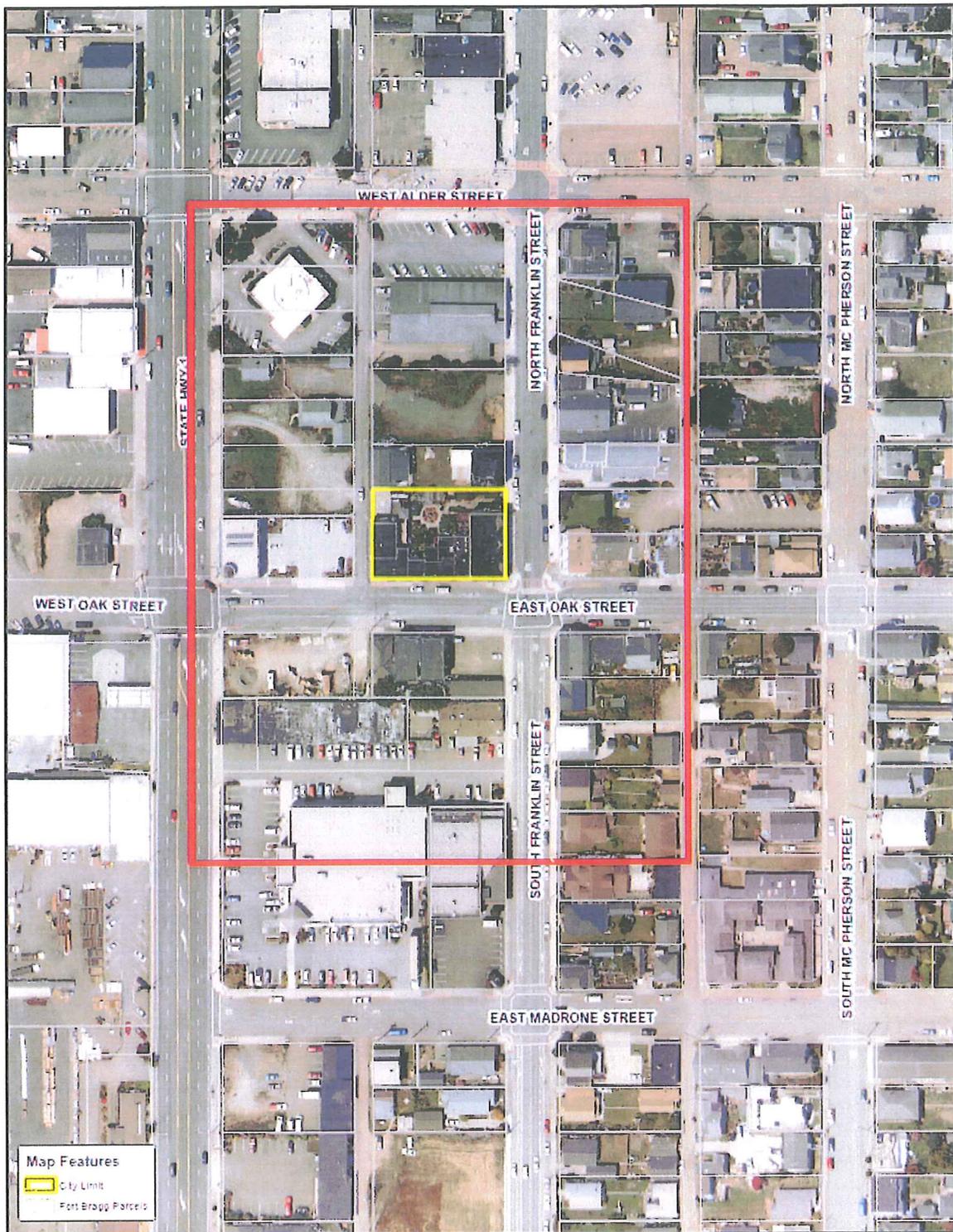
101 N. Franklin Street/Old Coast Hotel

Map Showing Fort Bragg City Limits and Project Location Within City Limits



ATTACHMENT 3

APE Map

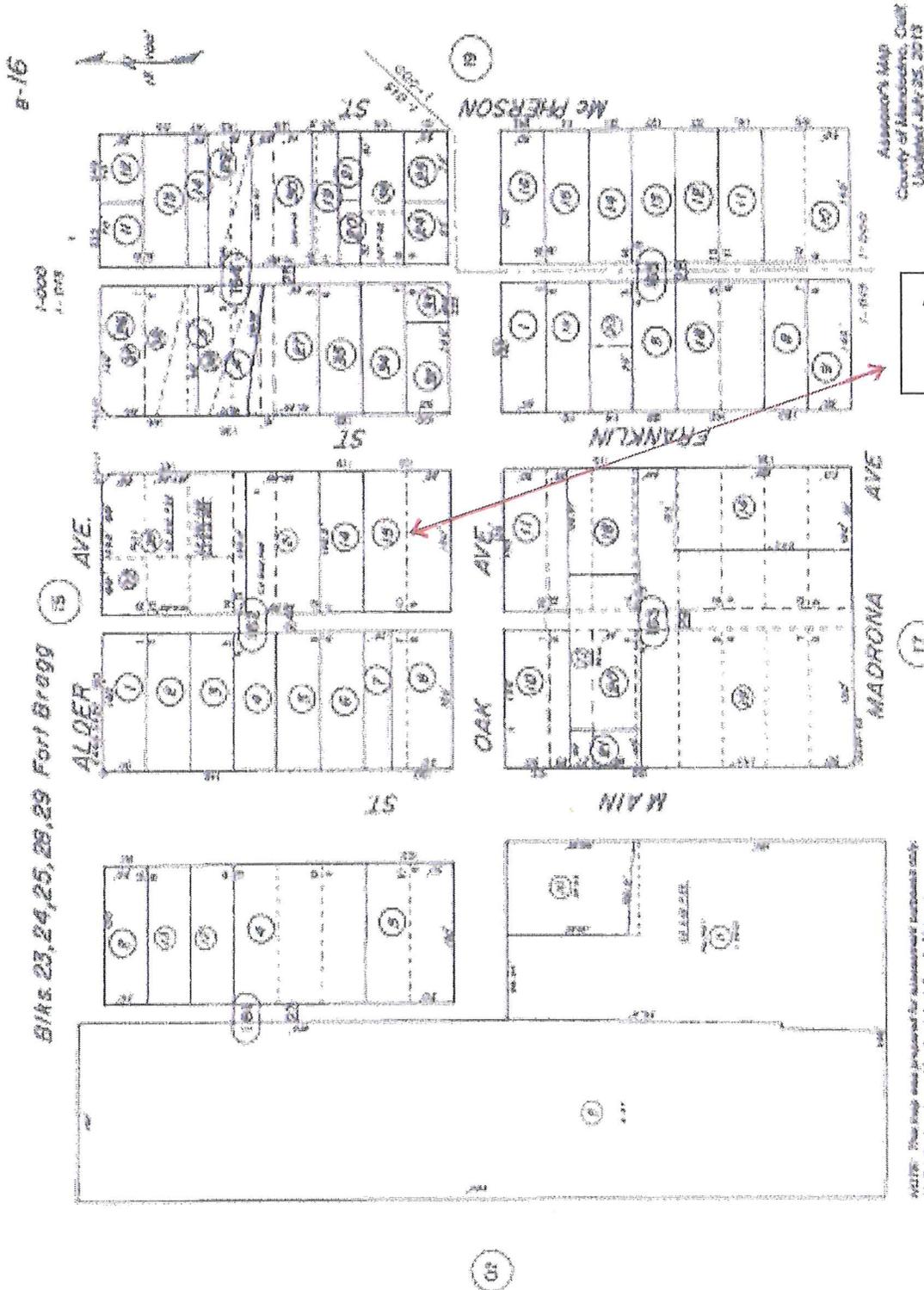


OLD COAST HOTEL - APE MAP
101 N. Franklin Street - APN 008-162-15



ATTACHMENT 4

APN Map Showing 101 N Franklin Street, APN 008-162-15-00



APN 008-162-15-00
101 N. Franklin St.
Old Coast Hotel

NOTES: This map was prepared for assessment purposes only. No liability is assumed for the data indicated herein.

ATTACHMENT 5

Views of APE Vicinity of 101 N Franklin Street/Old Coast Hotel

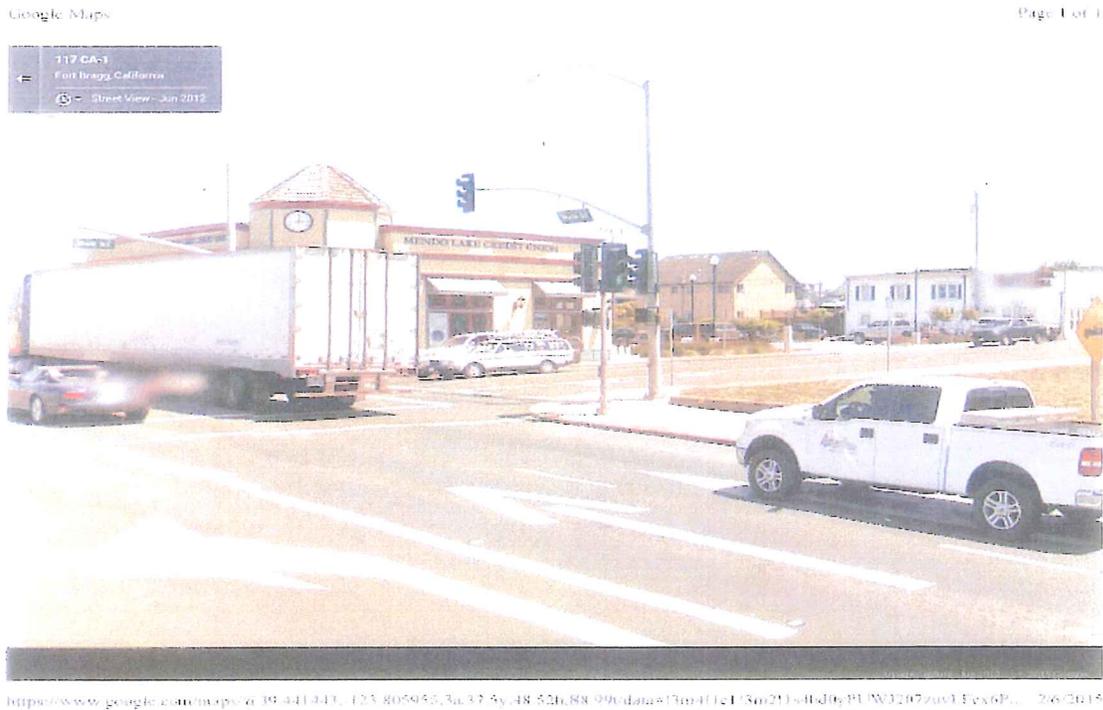
1. From upstairs rear deck of Old Coast Hotel looking west across alley, vacant parcel, and office building to Main Street Fire House.



2. Close view of Main Street buildings located in Picture 1 and including the building adjacent to north (right) side of the Fire House pictured in building one, west of Old Coast Hotel.



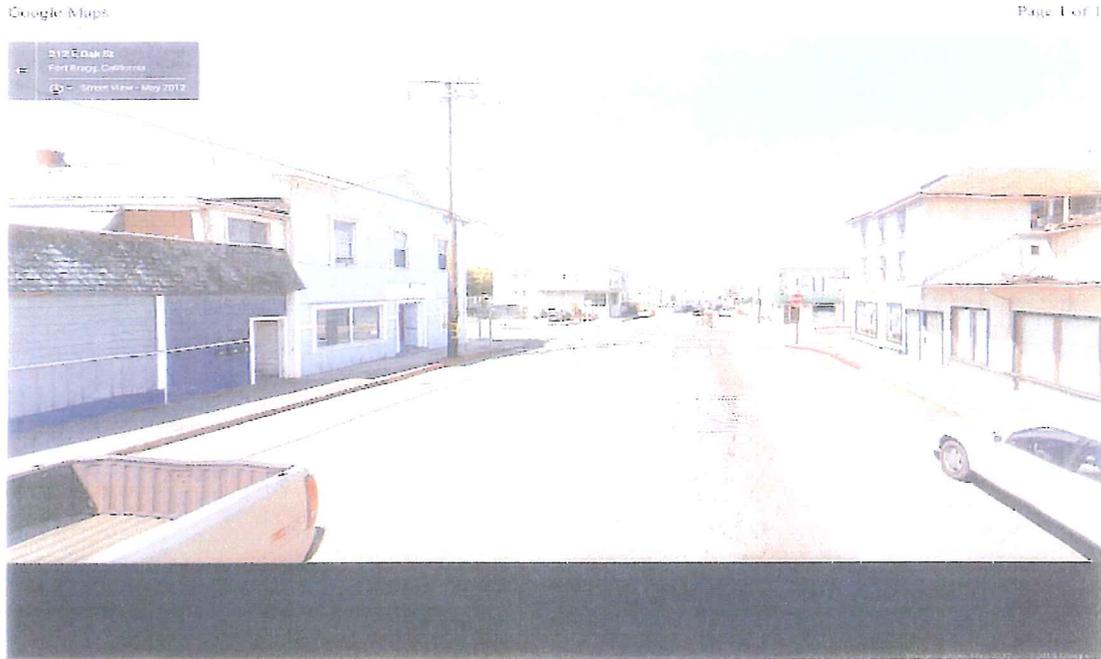
3. View to north from Main Street at Oak Street, with rear of Old Coast Hotel visible at right; rear structure of multi-family residence visible to north of OCH, and office building at corner of Main and Oak.



4. View looking east on Oak Street with OCH at left; blue building at right is vacant commercial/inhabited residential (constructed 1902/remodel 1907 & 1977); yellow building upper left houses a printing company (no construction date available).



5. View from one block east on Oak Street looking west. OCH is visible at right of intersestion; building in forefront at right is a print shop shown in View2; blue building at left is also shown in View 2.



<https://www.google.com/maps/@39.441702,-123.804224,3a,75y,274.17h,88.58t/data=!3m4!1e1!3m2!1sVM89L1AspPrajCOq9yk7...> 2/6/2015

6. View looking north on Franklin Street. OCH is to left; yellow bulding to right is printshop shown in views 4 and 5; yellow building to north of OCH is multi-familly residential originally constructed 1890, substantially reconstructed 1995; and subject of code-enforcement related façade replacement in 2013 per City records.



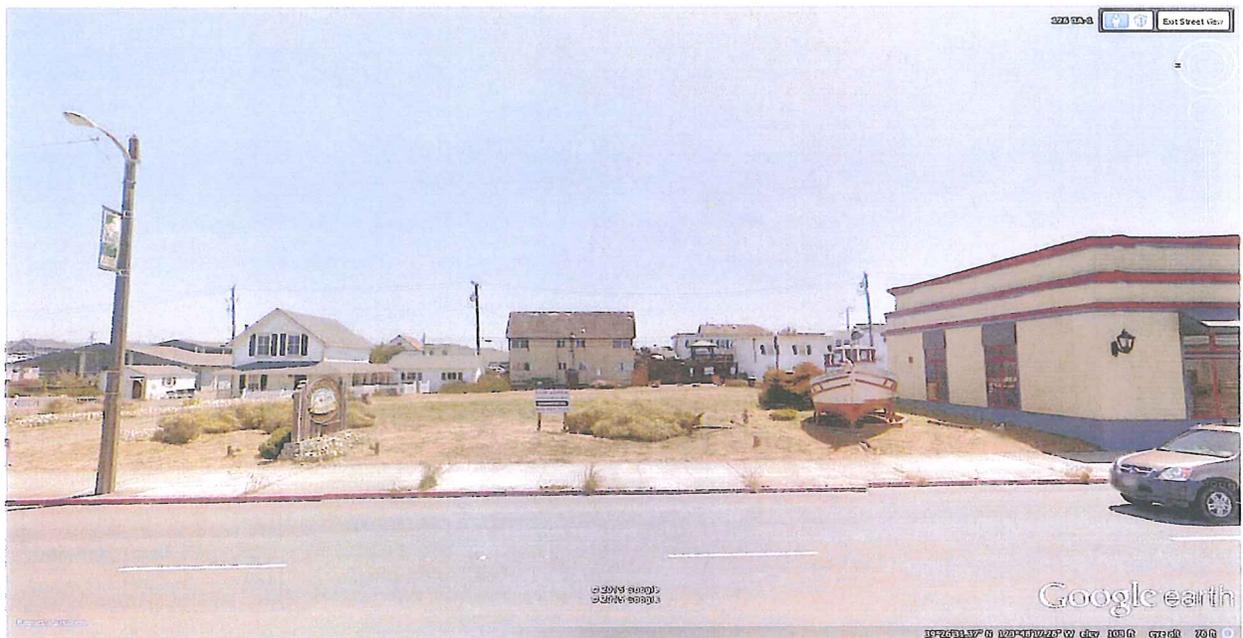
<https://www.google.com/maps/@29.441705,-122.804537,3a,37.5y,17.27h,89.92t/data=!3m4!1e1!3m2!1sXTPVfY-aC38GhmcJDRcC...> 2/6/2015

7. View from west rear side of OCH from Oak Street showing traffic in alley.



<https://www.google.com/maps/@39.441714,-123.895419,3a,37.5s,36.4t/data=!3m1!1e1!3m2!1sPN1H6ZNgZuqsaWz489312...> 2/5/2015

8. View west of hotel looking east from Highway 1/Main Street. OCH is white building visible in rear right; central building is back structure of 2-building multi-family residential unit; small house to left was constructed 1890 per City records.



9. View south from intersection of Franklin and Oak Streets. OCH is visible at right with green canopy. The white 2-story multi-family residential unit to right has been the subject of multiple City code enforcement efforts due to lack of maintenance and substandard conditions (interior and exterior). The blue structure at left is shown on Views 4 and 5 and has also been the subject of code enforcement efforts dues to substandard conditions interior and exterior. Yellow structure to south of blue building was constructed 1931, rehabilitated 1940 and 1961 per City records; structure out of view between yellow and blue buildings is undated per City records.

Google Maps

Page 1 of 1



<https://www.google.com/maps/@39.441834,-123.404548,34.75z> 214.9° (to 8.3°) 160.0m (to 1.0m) 211.8m (to 486°) 5.1991 (to 2.6) 20.5