

MEETING DATE: August 23, 2017

PREPARED BY: Marie Jones

PRESENTED BY: Marie Jones

AGENDA ITEM SUMMARY REPORT

APPLICATION NO.: Coastal Development Permit 11-12/17 (CDP 11-12/17)

OWNER: Georgia-Pacific LLC

APPLICANT: Michael Hassett, P.E., Manager – Environmental Engineering

PROJECT DESCRIPTION: Coastal Development Permit to demolish and remove 67,500 SF above ground structure, known as Dry Shed 4. All foundations would be left in place.

LOCATION: 90 West Redwood Avenue

APN: 008-02-013, 008-053-34

ZONING: Timber Resources Industrial (TI)

ENVIRONMENTAL DETERMINATION: Mitigated Negative Declaration & MND Addendum

**SURROUNDING
LAND USES:**

NORTH: GP Mill Site & West Fort Bragg Residential Neighborhood

EAST: Skunk Train, State Route One and Central Business District

SOUTH: GP Mill Site

WEST: GP Mill Site, Fort Bragg Coastal Trail property and ocean

PERMIT BACKGROUND

In order to facilitate review of this staff report in comparison to the staff report of June 24, 2017, staff has included all new text in purple.

After holding a Public Hearing on June 24, 2017 for Coastal Development Permit 11-12/17 (CDP 11-12/17), the Planning Commission directed staff to prepare a resolution for denial for CDP 11-12/17 because the environmental review of the project relied upon a dated 2003 report prepared by TRC, *Site Specific Treatment Plan for Cultural Resources*, which may not adequately identify appropriate mitigation measures for the demolition of the building. The Planning Commission expressed concern that the dated report might not: 1) adequately identify appropriate mitigation measures for the project and 2) comply with current State historic preservation law and practices in 2017. The Planning Commission directed staff to develop findings for denial and to work with the applicant to complete a more up-to-date review of the historic resource and identify appropriate mitigation measures.

On July 13th, 2017, the State Office of Historic Preservation (SHPO) issued a Section 106 consultation letter to the Army Corp of Engineers regarding the proposed implementation of the Operable Unit E Soil and Sediment Removal Action Plan. Section 106 of the National Historic Preservation Act requires the lead agency under NEPA, which is the Army Corp of Engineers, to obtain a determination from SHPO regarding potential impacts to cultural and historic resources. On page 2 of the letter, SHPO notes that the Army Corp recommends that the GP Mill Site is no longer eligible for listing on the National Register of Historic Places due to lack of integrity because most of the buildings no longer exist. The SHPO concurred with this recommendation on page 3 of the letter. Thus according to SHPO and the Army Corp of Engineers, Dry Shed 4 does not qualify as a historic resource under federal law (Attachment 1).

In late July, staff contacted SHPO to identify next steps to determine if Dry Shed 4 qualifies as a historic resource under State law. SHPO told City staff that, in order to determine if Dry Shed 4 is eligible for inclusion in the California Register of Historical Resources, a consultant should be hired to determine if Dry Shed 4 qualifies as a historic resource under Title 14 Chapter 11.5 of California Code of Regulations. This section identifies the types of historical resources and the criteria for listing a resource in the California Register of Historical Resources (Attachment 2).

Staff contacted GP and asked them to hire a consultant to complete a historic resource determination for Dry Shed 4 based on California Historic Resources law. On August 2, Environmental Science Associates (ESA), a well-regarded CEQA and planning consulting firm, submitted an analysis of Dry Shed 4. ESA's analysis determined that, under State historic preservation law, Dry Shed 4 does not qualify as a historic building under State law (Attachment 3).

Donald Barraza, a structural engineer retained by Georgia-Pacific, prepared a Structural Analysis, which details safety and structural concerns of the dry shed (Attachment 4).

GP submitted a letter dated August 7, 2-17 that details GP's concerns about the structural stability of the shed, especially given the coming winter and the impact of future storms on the stability of the shed (Attachment 5).

PROJECT BACKGROUND

The Georgia Pacific Mill Site occupies an approximately 323± acre site on the coastline of the City of Fort Bragg (Attachment 6). According to historical records, the timber mill in Fort Bragg began operations in 1885. Georgia-Pacific (G-P) acquired the facility and began operations in 1973. In November 2002, lumber production operations ceased at the facility. Since then, G-P has been engaged in the process of decommissioning the site. This has involved dismantling buildings, removal of equipment, extensive site investigations and interim remediation activities.

In October 2003 and October 2004, the City approved two coastal development permits (CDP 1-03; CDP 2-04)) authorizing demolition of the following structures on the Mill Site:

Map Number	Building Description	Construction Material	Approximate Construction Date	Square Footage
1	Sawmill	Wood & Metal	1970s	80,000 sf
2	Chipper Screen	Wood and metal	1985	680 sq. ft.
3	Sorter Building	Metal	1995	42,000 sq. ft.
4	Hog Building	Wood and Metal	1975	1,750 sq. ft.
5	Planer	Wood & Metal	1960s	163,248 sf
11	Compressor Building	Metal	1945	1,460 sq. ft.
12	Mill One Hog Building	Wood	Unknown	2,880 sf
13	Power House	Wood & Metal	1940s	33,600 sf
14	Fuel Barn	Metal	1940s	16,800 sf
15	Truck Dump Building	Wood & Metal	Unknown	192 sf
16	Water Treatment Building	Metal	1970s	3,200 sq. ft.
17	Boiler Fuel Oil Building	Metal	1990s	1,680 sf

In 2005, the City approved CDP 3-05 authorizing: 1) the removal of all building foundations for the above listed structures; 2) additional investigation of soils and ground water; and, 3) interim remedial measures (IRMs).

In March 2009, the City received and approved a request for an emergency CDP for the demolition of the badly damaged Truck Loading Shed on the former Georgia-Pacific Wood Products Facility site. The structure had suffered from serious damage due to driving winds, which were causing the roof to sag dangerously and the wall to bulge out. On June 20, 2009, the Planning Commission approved an after-the-fact Coastal Development Permit for the truck shed demolition.

In January of 2013, The Planning Commission approved CDP 11-12 to remove the above ground portions of 38 buildings on the Mill Site. GP submitted this permit request after being contacted by the Community Development Director regarding concerns about fire

safety at the site, as the site no longer had functioning fire suppression systems. Additionally many of the structures were in very poor condition and some were in danger of collapse in heavy winds. GP demolished 38 buildings, totaling 325,458 square feet, in 2013 as enumerated in Table 2 below:

Table 2: Georgia-Pacific Buildings Demolished in 2013

Building Description	Materials	Size (Square Feet)	Location (see Map)
Dry Shed #2	Wood	18,392	F-10
Glue Lam	Wood	17,400	F-10
Resaw #6	Wood	27,200	F-10
Dry Shed #5	Wood	43,200	D-9
Firehose Shed	wood	16	D-9
Planner #50	Wood	28,710	E-9
Construction Engineering	Wood	11,926	E-9
Generator Shed	Wood	64	E-9
Dry Kilns (5)	Wood & cinder block	48,960	D-8
Kiln Awnings (5)	Wood	40,320	D-8
Radio Room	Wood, steel	16	D-9
Guard Shack #2	Wood	16	C-7
Yard Office	Wood	2,640	E-9
Break Room	Wood	960	E-8
Valve Houses	Metal	384	E-8
Pump Houses (3)	Metal	576	F-10
Time Clock Shed	Wood	96	D-6
Veneer Building	Wood	17,484	E-6
Shipping Office	Wood	1,036	D-6
Scale Office	Wood	126	D-5
Tally Shack	Wood	48	E-5
Main Packing Shed	Metal	5,151	D-3
Chemical Storage Sheds	Wood	236	D-3
Green Houses	Steel Pipe & Fibergrass	58,000	C-3
Chalet	Wood	437	C-3
Corporation Yard Shed	Wood	64	C-3
	Total	323,458	

Most of the building materials were recycled. Material which was not recycled was disposed of at an off-site disposal facility. Structure foundations were retained to limit soil disturbance and debris generated by the removal.

PROJECT DESCRIPTION

Dry Shed 4 Condition. Dry Shed 4 is approximately 450 feet long and 150 feet wide for a total size of about 67,500 SF. (Please see Attachment 7 to view photos of the shed). Dry Shed 4 is constructed of the following components:

- Four bays with three large doors.
- An asphalt floor with a six foot slope from the north end of the building to the south end of the building.
- A wall system that is constructed of a three foot high concrete block perimeter wall with a 27 foot high wood framed wall that is sheathed in plywood. There is no insulation or interior finishes.
- The roof is composed of a metal girder system that holds up plywood sheathing and asphalt roll roofing.
- The building has no electrical or water service. While the building is plumbed with a fire sprinkler suppression system, the suppression system itself is no longer hooked up to a working water source.

Staff completed a site inspection of Dry Shed 4 to determine the shed's current condition. The shed has significantly deteriorated since the 2008 structural engineering analysis due to severe recent weather conditions, limited recent maintenance, the poor construction quality and the overall age of the building:

- A large section of the wall on the north east corner of the building has come completely unattached from the building and is leaning up in place.
- A large section of the roof on the south east corner of the building has come unattached, leaving a large hole in the roof. Aerial imagery reveals further unraveling of the roll roofing.
- The exterior painting is very weathered and has virtually worn away in most places.
- The sprinkler system is highly rusted and not in working condition.

Permit Request. CDP to demolish and remove a 75,000 SF above ground structure, known as Dry Shed 4. All foundations to be left in place.

CONSISTENCY WITH COASTAL GENERAL PLAN

The project is consistent with Timber Resources Industrial zoning as it includes the demolition of a building associated with the land use category and previously used for storage and inventory of wood products. Relevant policies from the Coastal General Plan are included below along with a consistency analysis.

The project is consistent with Policy LU-3.3 and LU-3.5

Policy LU-3.3: Historic Buildings and Mixed Uses: In the Central Business District and in other commercial areas with historic residential structures, encourage residential uses, mixed residential, and commercial uses, and the preservation of historic structures.

Policy LU-3.5 Re-Use of Existing Buildings: Encourage the adaptive re-use and more complete utilization of buildings in the Central Business District and other commercial districts.

While this building is not located in the Central Business District or a commercial district, nevertheless significant work has been done to try and reuse Dry Shed 4. GP initially retained Dry Shed 4, in part because the City had expressed interest in possibly purchasing the building for reuse as an Industrial Arts Center. The City completed an engineering analysis, design schematics and a cost estimate for reuse of the building and determined that \$4 million would be necessary to rehab the building and build it out for an Industrial Arts Center. Over the past seven years the City has not been able to identify an adequate funding source for this project, nor has a non-profit developed to take on the management and operations of the facility.

Additionally, Dry Shed 4 has deteriorated significantly since the City completed its engineering studies. Portions of the siding are missing and the building lost a sizable portion of the roof this past winter. At this time it appears that the building does not have sufficient structural integrity, physical condition or economic value for successful reuse. Policy LU-3.5 uses the word “encourage” not the word “require”, staff has encouraged GP to reuse Dry Shed 4 but at this time they don’t have a use for the structure. Additionally they have been willing to sell the shed for many years, but none have come forward with an offer to purchase it. At the June 24th Public Hearing the Skunk Train operator indicated that they would like to purchase Dry Shed 4 and reuse it as a round house. However, since that meeting, GP has indicated that GP does not have a purchase agreement with Skunk Train operators and GP does not view the Skunk Train as a viable buyer of the site or building (Attachment 5). Thus the project complies with policy LU- 3.3 and LU-3.5.

The proposed demolition project will comply with both Policy OS-3.1 and Policy OS-4.1 by avoiding soil disturbance and by avoiding foundation removal.

Policy OS-3.1 Soil Erosion: Minimize soil erosion to prevent loss of productive soils, prevent landslides, and maintain infiltration capacity and soil structure.

Policy OS-4.1. Preserve Archaeological Resources. New development shall be located and/or designed to avoid archaeological and paleontological resources where feasible, and where new development would adversely affect archaeological or paleontological resources, reasonable mitigation measures shall be required.

As conditioned the project will comply with Policy OS-7.2

Policy OS-7.2 Air Quality Standards: Seek to comply with State and Federal standards for air quality.

The project will also comply with Policy OS-8.1 as mandated by the City’s Demolition and Waste Recycling Ordinance.

Policy OS-8.1 Recycling and Reuse of Solid Waste: Comply with State requirements to reduce the volume of solid waste through recycling and reduction of solid waste.

The Demolition of Dry Shed 4 is anticipated to result in over 1,000 tons of demolition debris. The Planning Commission may choose to institute a Special Condition to encourage maximum local recycling of recoverable timbers. Many local wood workers have expressed an interest in purchasing some of the timbers from Dry Shed 4 for reuse in non-structural projects. The Special Condition below would result in maximum access for local recycling of these materials. In a July 7th letter, GP indicated that they recycled 182,584 board feet as part of the 2013 demolition work on the Mill Site and anticipate recycling the structural timbers from Dry Shed 4.

Special Condition 1: All wooden timbers shall be segregated from other demolition debris. GP's contractor will ensure maximum participation in local timber recycling by opening the site up for a one weekend "yard sale" that is well advertised and allows locals to purchase materials for reuse on site.

The project will comply with CD-1.1 by improving views to and along the ocean through the demolition of this large view obstructing structure on the Mill Site.

Policy CD-1.1: Visual Resources: Permitted development shall be designed and sited to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance scenic views in visually degraded areas.

The project complies with Policy CD-2.6 as the demolition would abate a nuisance building which is currently not maintained.

Policy CD-2.6 Property Maintenance and Nuisances: Ensure that properties are well maintained and nuisances are abated.

The project complies with Policy CD-7.2 as the project applicant and Staff have implemented a number of mitigation measures that were required by the MND (including retention of construction drawings and photographic records) to preserve the history of the building and make it available to the public (see discussion under Historic Resources).

Policy CD-7.2 Discourage Demolitions: Discourage the demolition of historic buildings.

Program CD-7.2.2: Revise the City's Coastal Land Use & Development Code to require the preparation of drawings and/or photographic records and the salvaging or preservation of architectural fixtures of historic structures that are demolished.

The Planning Commission could place a Special Condition on the CDP to retain the sign "Dry Shed #4." Although the sign is in very faint and in poor condition (see below); it is unclear where the sign could effectively be stored; and what it might be reused for. An

optional Special Conditions is included below for the Planning Commission's consideration:

Special Condition 2: GP shall offer to donate the Dry Shed 4 sign to the City of Fort Bragg or the Historical Society for possible reuse on the site at a later date. If neither entity accepts the sign, the sign may be recycled.



As conditioned, the project will comply with Policy SF-8.1 as the project will result in the removal of building materials that are contaminated with lead based paint.

Policy SF-8.1 Protection from Hazardous Waste and Materials: Provide measures to protect the public health from the hazards associated with the transportation, storage, and disposal of hazardous wastes (TSD Facilities).

The project complies with Policy N-1.6. The Mitigated Negative Declaration prepared for this project provides mitigation for noise related impacts, including limiting the time for demolition activities between the hours of 8:00 am and 5:00pm.

Policy N-1.6 Mitigate Noise Impacts: Mitigate noise impacts to the maximum feasible extent.

CONSISTENCY WITH POLICIES & REGULATIONS

Land Use. The subject property is located in the Timber Resources Industrial (TI) Zoning District. Demolition of Dry Shed 4 is permitted in the Coastal Zone upon issuance of a Coastal Development Permit.

Visual Resources. Demolition of Dry Shed 4 for the purpose of eliminating a safety danger and the visual blight associated with a damaged and decaying structure is consistent with visual resource protection policies in the City's Local Coastal Program (LCP). The demolition will restore visual access to the ocean from a number of public right-of-ways (Redwood Avenue and Stewart Street).

Dry Shed 4 blocking the view to the ocean at the end of Redwood Ave.



Dry Shed 4 blocking the view to the ocean at the South end of Stewart Street

Biological Resources. The City's Local Coastal Program (LCP) requires protection of all environmentally sensitive habitat areas, including rare and endangered plant species and wetlands, from any significant disruption of habitat values. The LCP requires establishment of a minimum 50-foot wide buffer area to protect environmentally sensitive habitat unless it can be demonstrated that 50 feet is unnecessary to protect the resources of the habitat area. There are two types of environmentally sensitive habitat within the project area: wetlands and rare plants.

Wetlands. An Army Corp of Engineers certified Jurisdictional Determination was prepared in 2009 by WRA to identify the extent of jurisdictional wetlands on the Mill Site. The study identified the Mill Pond as a jurisdictional wetland. The study identifies 21 potential jurisdiction wetlands on the site. However, Dry Shed 4 is located more than 100 feet from any jurisdictional wetland.

Special Status Plants. The area surrounding Dry Shed 4 is heavily disturbed and consists of paved and graveled stretches of developed land. A biological survey was completed for the GP Mill site in 2003 and special status plants were identified and located on the Coastal Trail. None were identified in or around Dry Shed 4. Staff completed a site inspection of the interior and exterior of the structure. The structure is surrounded by asphalt and gravel on the north, south and west sides. On the east side of the structure there is ruderal vegetation composed primarily of non-native invasive plants.

Special Status Animals. There are three large bird's nests in the roof supports for the shed. None of the nests have fledging's. Debris located on the floor (nesting materials, feathers and twigs) indicate that the nests were most likely occupied by ravens. The project is slated to occur after the nesting season, so no special conditions are required to address the presence of abandoned nests.

Archaeological and Cultural Resources. The project will have no impact on archaeological resources as the foundations will remain in place. Accordingly the demolition of Dry Shed 4 can proceed without impacting cultural resources. In the event that ground disturbing activity occurs during the demolition process Special Condition 3 has been added.

Special Condition 3: In the event prehistoric archaeological resources (marked by shellfish remains, flaked and ground stone tools, fire affected rock, human bone, or other related materials) are unearthed accidentally during demolition, all work in the vicinity of the site shall cease immediately, the Community Development Department shall be notified, and the proper disposition of resources shall be accomplished as required by ILUDC Section 18.50.030(D).

Historic Resources. According to the report *Phase II Determination of Significance Standing Structures Georgia-Pacific Lumber Mill, Fort Bragg, California* the entire site is eligible for listing as a historic district of the NRHP/California Register. In order to mitigate the negative impacts on the historic significance of the site due to demolition, the 2003 TRC *Site Specific Treatment Plan for Cultural Resources* report recommended:

#	Mitigation Measure	Mitigation Completed
1	The entire property shall be historically recorded via large format photography;	This was completed by Marie Jones, Director of Community Development in 2012 for CDP 12-11. All photos are located digitally and physically at the City of Fort Bragg.
2	The City shall retain copies of all construction drawings;	All construction drawings are located in City of Fort Bragg Building Permit Files.
3	A detailed history of lumber operations on the property shall be prepared;	See: <u>Transitions Over Time: A Chronological Perspective of the Union Lumber Company Lumber Mill</u> , 2008
4	Historic company photographs shall be collated into a collection;	The photo collection is located at the Guest House Museum archives and curated by the Fort Bragg Historical Society. A further photo collection is curated at the Bancroft Library at UC Berkeley.
5	Interviews with former employees of the mill shall be recorded and that a biography of C.R. Johnson be prepared, and	Kevin Bunker has interviewed a number of employees for a book he is writing about the Johnson Family and their social and political influence on Fort Bragg. <u>Memories of the Mendocino Coast: Being a Brief Account of the Discovery, Settlement and Development of the Mendocino Coast, together with the Correlated History of the Union Lumber Company and how Coast and Company grew up together</u> , by

	David Warren Ryder, 1984 includes extensive interviews of former mill workers and a comprehensive history of CJ Johnson.
6	<p>A publicly accessible document that describes the importance of the Mill with regard to the lumber industry and local history shall be prepared.</p> <p><u>See: Transitions Over Time: A Chronological Perspective of the Union Lumber Company Lumber Mill, 2008</u></p>

At the June 24th Planning Commission meeting, the Planning Commission directed staff to determine if the TRC study's Mitigation Measures go far enough to protect the value of Dry Shed 4 as a history resource. During the course of staff's research, the State office of Historic Preservation and ESA clarified that Dry Shed 4 is no longer eligible for listing on the National Registry of Historic places or the State register, as detailed below.

State and Federal Historic Resource Determination

Both SHPO and ESA reviewed the historic status of Dry Shed 4 and determined that the building is not eligible for listing on the federal or State registry. According to these analyses, the building is not eligible for listing on the historic register as it does not meet registry criteria.

1. Dry Shed #4 not eligible under Criteria A/1:

Criteria A/1: "It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States"

As Dry Shed 4 was constructed in the 1960s, it is not directly associated with the early development of or prominent years of the lumber industry in the area (significant patterns of development), which occurred between 1885 and 1953.

2. Dry Shed #4 is not eligible under Criteria B/2:

Criteria B/2: "It is associated with the lives of persons important to local, California, or national history"

Although the larger mill site property was associated with C. R. Johnson from its inception in 1885 until his death in 1940, Dry Shed 4 was constructed after his death and has no direct association with Johnson.

3. Dry Shed #4 is not eligible under Criteria C/3,

Criteria C/3: "It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values"

Dry Shed 4 is a common industrial building, it is not remarkable as an example of a style, and does not exhibit extraordinary design or craftsmanship. As described in TRC's report, the post-1945 buildings, especially those post-dating the period of significance of the district (1885-1953) such as the 1960 Dry Shed 4, are generally simple, post-war utilitarian warehouses and office buildings.

4. Finally, Dry Shed #4 is not eligible under Criteria D/4

Criteria D/4: "It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation."

Dry Shed 4 is a common industrial building, it is not remarkable as an example of a style, and does not exhibit extraordinary design or craftsmanship as such it is not expected to yield useful information important to history.

Local Historic Resource Determination

Staff completed further research to determine if Dry Shed 4 could be eligible as a local historic resource. If Dry Shed 4 were listed as a local historic resource, the procedures described in FBMC Section 17.74.060 would have to be followed in order for the demolition to be approved. Dry Shed 4 is not currently listed on the City of Fort Bragg's historic building inventory. In order to be listed on the City's Historic Register per Section 17.74.020B 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.

Dry Shed 4 is not currently a historic resource, as it is:

1. Not eligible for listing on the National Register of Historic Places as a district (per the attached SHPO letter); and
2. A historic resources survey has been completed of the property and it has been determined that Dry Shed 4 is not a historic resource as an individual structure (ESA's report); and
3. The City Council has not designated the building as a part of a Historic Landmark District per section 17.74.030.

The City Council has the authority to designate a Historic Landmark District per section 17.74.030 of the CLUDC. The designation of a Historic Landmark District must be noticed

in a paper and include a public hearing, a recommendation by the Planning Commission, and a final decision by the City Council. As this process has not been undertaken, Dry Shed 4 is not currently located in a locally designated Historic Landmark District. The Historic Landmark District designation process has not been implemented in Fort Bragg, since the CLUDC was adopted in 2008 or since the ILUDC was adopted in 2004.

Per Section 17.74.030 Historic Landmark Districts may be designated based on the following criteria:

1. Evaluation of the age of the subject structure(s);
2. Distinguishing characteristics;
3. Distinct geographical area;
4. Familiar visual features;
5. Significant achievement; and/or
6. Distinctive features.

City Council may choose to designate Dry Shed 4 as a Historic Landmark District based on criteria 4 or 6; it may not qualify under the other criteria based on the data already presented in this staff report

For the City Council to designate Dry Shed 4 as a Historic Landmark District the City submit a LCP amendment to the Coastal Commission per Chapter 17.94. An LCP amendment would require public hearings, a Planning Commission recommendation, City Council approval and referral to the Coastal Commission for deliberation and certification.

Per State law, generally a planning permit applicant must comply with permitting requirements in place at the time that the applicant submits a complete permit application. Permit applicants are not required to comply with changes in the zoning ordinance that occur after the submission of the complete application but before the approval of the permit. GP has submitted a complete permit application for a CDP to demolish Dry Shed 4 and the regulations in place at the time of submission did not include the designation of the Dry Shed 4 within a Historic Landmark District. As the designation of a Historic Landmark District by City Council would require an LCP Amendment, denying the permit at this time in order to proceed with the Historic Landmark District designation may expose the City to legal risk.

Erosion and Water Quality. Removal of Dry Shed 4 has the potential to change stormwater flows on the site as the stormwater that currently flows from roof tops into below surface drains will likely sheet flow across the property to the coast, where it may contribute to erosion. The following Special Conditions will address erosion, sedimentation and water quality impacts associated with the project.

Special Condition 4: The following Best Management Practices to control, reduce or prevent discharge of pollutants from demolition and material handling activities shall be utilized throughout project implementation:

- (a) Material and products will be stored in manufacturer's original containers.
- (b) Storage areas will be neat and orderly to facilitate inspection.
- (c) Check all equipment for leaks and repair leaking equipment promptly.
- (d) Perform major maintenance, repairs, and washing of equipment away from demolition site.
- (e) Designate a completely contained area away from storm drains for refueling and/or maintenance work that must be performed at the site.
- (f) Clean up all spills and leaks using dry methods (absorbent materials/rags).
- (g) Dry sweep dirt from paved surfaces for general clean-up.
- (h) Train employees in using these BMPs.
- (i) Avoid creating excess dust when breaking concrete. Prevent dust from entering waterways.
- (j) Protect storm drains using earth dikes, straw bales, sand bags, absorbent socks, or other controls to divert or trap and filter runoff.
- (k) Shovel or vacuum saw-cut slurry and remove from the site.
- (l) Remove contaminated broken pavement from the site promptly. Do not allow rainfall or runoff to contact contaminated broken concrete.
- (m) Schedule demolition work for dry weather periods.
- (n) Avoid over-application by water trucks for dust control.
- (o) Cover stockpiles and other construction materials with heavy duty plastic secured and weighted on all sides to maintain cover from wind and rain even in high wind conditions. Protect from rainfall and prevent runoff with temporary roofs or heavy duty plastic and berms.

Special Condition 5: Demolition activity shall cease if actual wind speeds reach or exceed 25 mph.

Air Quality. The City of Fort Bragg is located in the North Coast Air Basin and is within the jurisdiction of the Mendocino County Air Quality Management District (AQMD). Mendocino County is an "attainment area" for local, state and federal air quality standards except for suspended particulate matter (PM10). Demolition activities may result in temporary increases in airborne dust emissions. The Mendocino Air Quality Management District provided a comment letter on the project, noting that the applicant's contractors may be required to obtain local air quality permits or state mobile equipment permits. The contractors for the project are encouraged to Call AQMD at 463-4354 with any questions. The AQMD will require that a fugitive dust permit be issued for this project prior to the issuance of a demolition permit. This will establish measures to prevent dust from traveling off-site. A Facility Wide Dust Control Permit is necessary for the demolition project. Potential adverse impacts to air quality will be addressed through the following Special Condition:

Special Condition 6: Prior to issuance of demolition permits, the applicant shall secure a Facility Wide Dust Control Permit from the Mendocino County Air

Quality Management District. All demolition activities shall be conducted in accordance with the requirements of the permit. Particles generated in the demolition process will be minimized via dust suppression control. A Dust Suppression Officer will be assigned to the facility during the dismantling process.

Fire. The Fire Marshal is concerned about the potential for fire during the demolition process. Accordingly, Steve Wells has requested the following special conditions be added to this permit:

Special Condition 7: Georgia-Pacific shall designate a person to be the fire prevention program superintendent, who shall be responsible for the fire prevention program and ensure that it is carried out through completion of the project. The fire prevention program superintendent shall have the authority to enforce the provisions of CH 14 C.F.C and other provisions as necessary to secure the intent of CH 14 C.F.C. Where guard service is provided the fire prevention program superintendent shall be responsible for the guard service.

Special Condition 8: Approved vehicle access for firefighting shall be provided to the demolition site. Vehicle access shall be provided by either temporary or permanent roads capable of supporting vehicle loading under all weather conditions. Vehicle access shall be provided from the Redwood Gate during demolition activities. Such access may be secured by providing the Fire Department with keys to the gate. Access roads shall be kept clear of obstructions to provide for rapid fire response during demolition activities. Upon completion of demolition activities, fire access shall be maintained on the site until permanent fire apparatus access roads are available.

Special Condition 9: One approved portable fire extinguisher shall be on site throughout the demolition process in accordance with section 906 and sized for locations where combustible materials have accumulated and the demolition materials storage area.

Hazards. Dry Shed 4 is contaminated with some lead based paint. An asbestos analysis was completed for the building and no asbestos was identified. The Mendocino Air Quality Management District requested the following special conditions regarding hazardous materials:

Special Condition 10: The applicant is required by Part 61, Chapter 1 Title 40 of the Code of Federal Register to submit proof of asbestos inspection and an Asbestos Notification Form to the Air Quality Management District prior to issuance of a demolition permit.

Additionally the Mitigated Negative Declaration (MND) for the project requires mitigation measure to mitigate potential hazards and these are included below as Special Conditions.

Special Condition 11: All work involving structures with asbestos and lead containing paint will be performed in general accordance with local, state, and federal rules and regulations. A certified and trained contractor will be utilized to secure the necessary permits and conduct the required abatement activities. All of the work involving asbestos is associated with aboveground structure removal and shall conform with the requirements outlined in APPENDIX A: ASBESTOS ABATEMENT TECHNICAL SPECIFICATIONS, AMEC, February, 2013, submitted by the applicant as part of the Coastal Development permit application. All of the work involving lead-based paint is associated with aboveground structure removal and shall conform with the requirements outlined in APPENDIX B: HAZARDOUS AND REGULATED MATERIALS TECHNICAL SPECIFICATIONS AMEC, February, 2013

Special Condition 12: Stockpiles of concrete without stains or evidence of hazardous waste will be transported offsite to a recycling waste disposal facility.

Special Condition 13: Wherever possible, broken concrete and other demolition debris will be stockpiled on areas with improved asphalt or concrete surface. Potentially hazardous waste will be stored in a Potentially Hazardous Waste Storage Area.

Special Condition 14: The applicant will follow the submitted Transportation Plan that describes the protocol and procedures to protect human health and the environment during transportation activities to remove debris with hazardous materials.

Public Access. The property is private, and there are no known prescriptive easements across the property. The site is not a public access location, nor is it specified as a future vertical access location in the LCP. Additionally, GP donated 54 acres to the City of Fort Bragg for coastal access in 2009. This acreage, combined with the City's purchase of an additional 38 acres, resulted in the creation of the 92 acre coastal trail and Noyo headlands Park in 2015. This facility provides public access to the ocean for the length of the GP Mill Site. The demolition project will not have an impact on public access.

Analysis of Potential Findings for Denial

In order to deny CDP 11-12/17 the Planning Commission must make findings for denial, per CLUDC17.71.045(l)(2). The required findings for denial of CDP 11-12/17 must include one or more of the following:

a. The proposed development as described in the application and accompanying materials, as modified by any conditions of approval, is not in conformity with the City of Fort Bragg's certified Local Coastal Program and will adversely affect coastal resources;

This finding cannot be made. See the above discussion for a detailed analysis of the project's conformance with the certified LCP and the project's effects on coastal resources.

- b. If the project is located between the first public road and the sea, that the project is not in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 (commencing with Sections 30200 of the Public Resources Code);*

This finding cannot be made, as public access to the sea is afforded by the City's Noyo Headland Park and Fort Bragg Coastal Trail.

- c. Feasible mitigation measures and/or alternatives have not been incorporated to substantially lessen any significant adverse effects of the development on the environment;*

This finding cannot be made. See the Special Conditions of this staff report, the MND, MND Addendum, and ESA memo. The building is no longer deemed part of a historic district because the historic district was determined to no longer exist by the State Office of Historic Preservation. The shed is also not a historic building under state law per the analysis prepared by ESA. Nor is the shed listed as a historic building under local law.

- d. The proposed use is not consistent with the purposes of the zone in which the site is located;*

This finding cannot be made. See the discussion above regarding the projects compliance with the purposes of the zoning district.

- e. The proposed development is not in conformance with the City of Fort Bragg's Coastal General Plan;*

This finding cannot be made. See the discussion above regarding the City's Coastal General Plan.

- f. The proposed location of the use and conditions under which it may be operated or maintained will be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity; and*

This finding cannot be made. There is a possibility that, if the CDP is denied and the building is retained, it could become detrimental to public safety as the building is slowly unraveling due to strong winter storms and lack of ongoing use and maintenance.

- g. Services, including but not limited to, water supply, sewage disposal, solid waste, and public roadway capacity have been considered and are not adequate to serve the proposed development;*

This finding cannot be made. The proposed project involves the demolition of a structure which will not have any impact on water supply, sewage disposal or public roadway capacity. The project will result in significant one-time generation of Solid Waste. The project will be required to conform to the City's Construction and Demolition Recycling ordinance which requires set goals of

recycling and the payment of a recycling deposit which is only refundable if the recycling goals are met.

In conclusion, staff cannot identify a basis to deny this Coastal Development Permit at this time.

ALTERNATIVE ACTIONS

1. The Planning Commission could adopt a resolution to City Council recommending that the Dry Shed 4 be designated a Historic Landmark District and take no action on the permit before the Planning Commission (see Attachment 11).
2. The Planning Commission could certify the Addendum to Mitigated Negative Declaration for Georgia Pacific Mill Site Demolition Project, and approve Coastal Development Permit 11-12/17 for the demolition of Dry Shed 4 based on the findings and subject to the conditions.

RECOMMENDATION

1. **Staff recommends certification of the addendum to Mitigated Negative Declaration for Georgia Pacific Mill Site Demolition Project, and approval of Coastal Development Permit 11-12/17 for the demolition of Dry Shed 4 based on the findings and subject to the conditions cited below:**

FINDINGS

1. The demolition of Dry Shed 4 is necessary to eliminate safety concerns stemming from the lack of a functional fire suppression system on the Mill Site and the dilapidated state of many of the buildings, which make them susceptible to storm damage. The demolition will also remove conditions of blight and improve the visual character in an area of scenic importance;
2. The proposed project is consistent with the purpose and intent of the Timber Resources Industrial (IT), as well as all other applicable provisions of Title 17 of the Fort Bragg Municipal Code, and applicable provisions of the Fort Bragg Municipal Code in general;
3. The proposed project is in conformity with the certified Local Coastal Program (LCP);
4. The site is physically suitable in terms of design, location, shape, size, operating characteristics, and the provision of public and emergency vehicle (e.g., fire and medical) access and public services and utilities (e.g., fire protection, police protection, potable water, schools, solid waste collection and disposal, storm drainage, wastewater collection, treatment, and disposal, etc.), to ensure that the type, density, and intensity of use being proposed would not endanger, jeopardize, or otherwise constitute a hazard to the public interest, health, safety, convenience, or welfare, or be materially injurious to the improvements, persons, property, or uses in the vicinity and zoning district in which the property is located;
5. As proposed, the development will not have any unmitigated adverse impacts to any known historical, archaeological or paleontological resource;

6. The proposed development will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act as provided by a Mitigated Negative Declaration and a MND Addendum that have been prepared for the project; and
7. The proposed development is in conformity with the public access and public recreation policies of the LCP and Chapter 3 of the California Coastal Act.

COASTAL DEVELOPMENT PERMIT FINDINGS

1. The proposed development as described in the application and accompanying materials, as modified by any conditions of approval, is in conformity with the City of Fort Bragg's certified Local Coastal Program and will not adversely affect coastal resources;
2. The project is located between the first public road and the sea, that the project is in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 (commencing with Sections 30200 of the Public Resources Code);
3. Feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment;
4. The proposed use is consistent with the purposes of the zone in which the site is located;
5. The proposed development is in conformance with the City of Fort Bragg's Coastal General Plan;
6. The proposed location of the use and conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity; and
7. Services, including but not limited to, water supply, sewage disposal, solid waste, and public roadway capacity have been considered and are adequate to serve the proposed development;
8. Supplemental findings for projects involving geologic, flood, and fire hazards:
 - i. The project, as proposed, will neither be subject to nor increase instability of the site or structural integrity from geologic, flood, or fire hazards due to project design, location on the site or other reasons; and
 - ii. The project, as conditioned, will not have significant adverse impacts on site stability or structural integrity from geologic, flood, or fire hazards due to required project modifications, landscaping or other conditions; and
 - iii. There are no alternatives to development that would avoid or substantially lessen impacts on site stability or structural integrity.
9. Supplemental findings for projects located within Environmentally Sensitive Habitat Areas:
 - i. The resource as identified will not be significantly degraded by the proposed development; and
 - ii. There is no feasible less environmentally damaging alternative; and
 - iii. All feasible mitigation measures capable of reducing or eliminating project related impacts have been adopted.
10. Supplemental findings for projects located between the first public road and the sea required by Section 17.56.070 of this Development Code.

SPECIAL CONDITIONS

1. All wooden timbers shall be segregated from other demolition debris. GP's contractor will ensure maximum participation in local timber recycling by opening the site up for a one weekend "yard sale" that is well advertised and allows locals to purchase materials for reuse on site.
2. GP shall offer to donate the Dry Shed 4 sign to the City of Fort Bragg or the Historical Society for possible reuse on the site at a later date. If neither entity accepts the sign, the sign may be recycled.
3. In the event prehistoric archaeological resources (marked by shellfish remains, flaked and ground stone tools, fire affected rock, human bone, or other related materials) are unearthed accidentally during demolition, all work in the vicinity of the site shall cease immediately, the Community Development Department shall be notified, and the proper disposition of resources shall be accomplished as required by LUDC Section 18.50.030(D).
4. The following Best Management Practices to control, reduce or prevent discharge of pollutants from demolition and material handling activities shall be utilized throughout project implementation:
 - a. Material and products will be stored in manufacturer's original containers.
 - b. Storage areas will be neat and orderly to facilitate inspection.
 - c. Check all equipment for leaks and repair leaking equipment promptly.
 - d. Perform major maintenance, repairs, and washing of equipment away from demolition site.
 - e. Designate a completely contained area away from storm drains for refueling and/or maintenance work that must be performed at the site.
 - f. Clean up all spills and leaks using dry methods (absorbent materials/rags).
 - g. Dry sweep dirt from paved surfaces for general clean-up.
 - h. Train employees in using these BMPs.
 - i. Avoid creating excess dust when breaking concrete. Prevent dust from entering waterways.
 - j. Protect storm drains using earth dikes, straw bales, sand bags, absorbent socks, or other controls to divert or trap and filter runoff.
 - k. Shovel or vacuum saw-cut slurry and remove from the site.
 - l. Remove contaminated broken pavement from the site promptly. Do not allow rainfall or runoff to contact contaminated broken concrete.
 - m. Schedule demolition work for dry weather periods.
 - n. Avoid over-application by water trucks for dust control.
 - o. Cover stockpiles and other construction materials with heavy duty plastic secured and weighted on all sides to maintain cover from wind and rain even in high wind conditions. Protect from rainfall and prevent runoff with temporary roofs or heavy duty plastic and berms.
5. Demolition activity shall cease if actual wind speeds reach or exceed 25 mph.
6. Prior to issuance of demolition permits, the applicant shall secure a Facility Wide Dust Control Permit from the Mendocino County Air Quality Management District. All demolition activities shall be conducted in accordance with the requirements of the permit. Particles generated in the demolition process will be minimized via dust

suppression control. A Dust Suppression Officer will be assigned to the facility during the dismantling process.

7. Georgia-Pacific shall designate a person to be the fire prevention program superintendent, who shall be responsible for the fire prevention program and ensure that it is carried out through completion of the project. The fire prevention program superintendent shall have the authority to enforce the provisions of CH 14 C.F.C and other provisions as necessary to secure the intent of CH 14 C.F.C. Where guard service is provided the fire prevention program superintendent shall be responsible for the guard service.
8. Approved vehicle access for firefighting shall be provided to the demolition site. Vehicle access shall be provided by either temporary or permanent roads capable of supporting vehicle loading under all weather conditions. Vehicle access shall be provided from the Redwood Gate during demolition activities. Such access may be secured by providing the Fire Department with keys to the gate. Access roads shall be kept clear of obstructions to provide for rapid fire response during demolition activities. Upon completion of demolition activities, fire access shall be maintained on the site until permanent fire apparatus access roads are available.
9. One approved portable fire extinguisher shall be on site throughout the demolition process in accordance with section 906 and sized for locations where combustible materials have accumulated and the demolition materials storage area.
10. The applicant is required by Part 61, Chapter 1 Title 40 of the Code of Federal Register to submit proof of asbestos inspection and an Asbestos Notification Form to the Air Quality Management District prior to issuance of a demolition permit.
11. All work involving structures with asbestos and lead containing paint will be performed in general accordance with local, state, and federal rules and regulations. A certified and trained contractor will be utilized to secure the necessary permits and conduct the required abatement activities. All of the work involving asbestos is associated with aboveground structure removal and shall conform with the requirements outlined in APPENDIX A: ASBESTOS ABATEMENT TECHNICAL SPECIFICATIONS, AMEC, February, 2013, submitted by the applicant as part of the Coastal Development permit application. All of the work involving lead-based paint is associated with aboveground structure removal and shall conform with the requirements outlined in APPENDIX B: HAZARDOUS AND REGULATED MATERIALS TECHNICAL SPECIFICATIONS AMEC, February, 2013
12. Stockpiles of concrete without stains or evidence of hazardous waste will be transported offsite to a recycling waste disposal facility.
13. Wherever possible, broken concrete and other demolition debris will be stockpiled on areas with improved asphalt or concrete surface. Potentially hazardous waste will be stored in a Potentially Hazardous Waste Storage Area.
14. The applicant will follow the submitted Transportation Plan that describes the protocol and procedures to protect human health and the environment during transportation activities to remove debris with hazardous materials.

STANDARD CONDITIONS

1. This action shall become final on the 11th working day following the Coastal Commission's receipt of the Notice of Final Action unless an appeal to the Coastal Commission is filed pursuant to Chapter 17.61.063 17.92.040. This action is appealable to the California Coastal Commission pursuant to Chapter 17.92.040.
 2. The application, along with supplemental exhibits and related material, shall be considered elements of this permit, and compliance therewith is mandatory, unless an amendment has been approved by the City.
 3. This permit shall be subject to the securing of all necessary permits for the proposed development from City, County, State and Federal agencies having jurisdiction. All plans submitted with required permit applications shall be consistent with this approval.
 4. This permit shall be subject to revocation or modification upon a finding of any one or more of the following:
 - (a) That such permit was obtained or extended by fraud.
 - (b) That one or more of the conditions upon which such permit was granted have been violated.
 - (c) That the use for which the permit was granted is so conducted as to be detrimental to the public health, welfare or safety or as to be a nuisance.
 - (d) A final judgment of a court of competent jurisdiction has declared one or more conditions to be void or ineffective, or has enjoined or otherwise prohibited the enforcement or operation of one or more conditions.
 5. This permit is issued without a legal determination having been made upon the number, size or shape of parcels encompassed within the permit described boundaries. Should, at any time, a legal determination be made that the number, size or shape of parcels within the permit described boundaries are different than that which is legally required by this permit, this permit shall become null and void.
 6. This Coastal Development Permit approval shall lapse and become null and void 24 months from the date of approval unless before the passing of 24 months, construction has commenced and is diligently pursued towards completion or an extension is requested and obtained.
- Consider adding alternative per above comments.

DISTRIBUTION

Mike Hasset, GP
Tom Lanphar, DTSC
Cristin Kenyon, California Coastal Commission

ATTACHMENTS

1. July 13th, 2017 State Office of Historic Preservation (SHPO) letter to the Army Corp of Engineers
2. Title 14 Chapter 11.5 of the California Code of Regulations
3. ESA Memorandum dated August 2, 2017 detailing the status of Dry Shed 4 with regard to State Historic Building designation.

4. Letter dated January 13, 2017 from Kennedy/Jenks Consultants regarding the structural integrity of Dry Shed 4 after storm damage
5. Letter dated August 7th from Georgia-Pacific summarizing GP's concerns regarding Dry Shed 4
6. Site Location Map
7. Site Photos
8. MND
9. MND Addendum
10. Project Application
11. Resolution recommending the City Council consider Dry Shed 4 for designation as a Historic Landmark District