



Georgia-Pacific

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October 5, 2017

Marie Jones
Community Development Director
City of Fort Bragg
416 N Franklin Street
Fort Bragg, CA 95437

**Subject: Dry Shed #4 Demolition – Coastal Development Permit Application
Georgia-Pacific LLC
90 West Redwood Avenue, Fort Bragg, CA**

Dear Marie:

Georgia-Pacific LLC (GP) has prepared this letter in furtherance of our concerns regarding the City of Fort Bragg (City) Planning Commission's recent decision to suspend GP's application to raze and remove the building referred to as Dry Shed #4. Our understanding is that the Planning Commission will be holding a public hearing on October 11, 2017 in the interest of designating Dry Shed #4 as a historic landmark.

As we articulated in our previous letter dated August 7, 2017, there are a host of reasons for why we feel strongly, and why the City's own staff report recommends, removal of this building. Again, these reasons are detailed below.

1. In a letter dated July 13, 2017, the State of California Office of Historic Preservation deemed that Dry Shed #4 is not eligible for listing on the National Register of Historic Places.
2. Based on the findings and conclusions prepared by an architectural historian, Dry Shed #4 is also not eligible for listing as an individual resource, nor a contributor to a historic district, to the California Register of Historic Places.
3. As stated in the staff report prepared by the City, the City previously expressed interest in acquiring Dry Shed #4 for reuse as an industrial arts center. Based on the City's engineering analysis, it was determined that \$4MM would be necessary to rehab the building for such purpose. GP has previously offered to divest Dry Shed #4 to the City on different occasions over the past several years, but neither the City nor any other non-profit entity has been able to produce the requisite plans and funding to acquire and redevelop the structure. The staff report goes on further to state that 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.

4. There is no purchase and sale agreement with Mendocino Railway for Dry Shed #4 and surrounding property, nor are there other interested parties that have come forward with a viable purchase offer for the property in the last several years.
5. GP commissioned a licensed structural engineer to assess Dry Shed #4 after it sustained further damage after a series of storms in January 2017. The findings concluded: “The recent storm related roof damage in the southeast corner of the building has seriously weakened the roof framing in the southeast corner of the building and support for the gable end at the southeast corner of the building. The loss of roof framing in the southeast corner and the potential for future loss of roof and wall framing in the southeast corner of the building pose an unsafe and potential hazardous condition to operations, personnel, equipment, and vehicles inside and outside the building in the general vicinity. The loss of additional roof framing or damage to wall framing could cause the south wall of the building to become unstable...”
6. Based on the findings from the structural report, GP elected to restrict occupancy of Dry Shed #4 and requested that the then tenant, Holmes Lumber, vacate the premises.
7. Just as recently as July 20, 2017 there was a report of trespassing, theft, and vandalism in Dry Shed #4. While we have taken reasonable steps to secure and post the building, it is clear that the dry shed cannot be secured against vandals intent on entering our property. This creates risks for our security staff and contractors as well as any first responders and is another reason we need to take the building down as soon as possible. The potential for illegal trespassing will only increase after the coastal trail is connected.
8. In reference to the previous demolition work in 2013, an individual at the public hearing inferred that no effort was made to recycle timbers and that the means for demolishing the buildings were careless. It should be clarified that the demolition work completed in 2013 met all of the conditions in the Coastal Development Permit and City Building Demolition Permit, including the City’s waste diversion and recycling requirements. In fact, GP received the *Mayor’s Well Done Award for Best Demolition Project*. A total of 182,584 board feet of redwood beams were sized and planed on site, and ultimately salvaged by a local subcontractor. This is equivalent to 350 tons of recycled timbers. Similar efforts to recycle redwood beams/timbers will be employed with Dry Shed #4.

Furthermore, we offer the following with respect to the Planning Commission’s upcoming public hearing to recommend passing a resolution to the City Council for designating Dry Shed #4 as a historic landmark.

9. Under the City’s Historic Resource Protection provisions in Chapter 17.74, Dry Shed #4 may only qualify as a Historic Landmark under the familiar visual features or distinctive features criteria. As referenced above, it was previously determined that the structure would not be eligible for listing under the other criteria set forth in the ordinance after finding that the structure would not quality for designation as a matter of State and Federal law. As stated in The City’s Staff Report:

“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.”*

For the same reason Dry Shed #4 did not meet similar criteria under both State and Federal criteria, it is not a distinctive historical feature. As detailed in the City’s Staff Report:

“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.”

10. Chapter 17.74.060 stipulates requirements that apply to the proposed demolition of a historic resource. While Dry Shed #4 is not a historic resource, and was only nominated as a historic resource after GP submitted the CDP application for demolition, it already meets the Certificate of Appropriateness criteria for demolition, as follows:

A. *Research required.* *Appropriate archival research shall be conducted to determine the cultural and historic significance of any historic resource proposed for demolition in compliance with this Section. All costs associated with the research effort shall be paid for by the project proponent.*

The extensive research conducted in order to determine that Dry Shed #4 is not historically significant was outlined in detail in the City’s own Staff Report presented at the August 23, 2017 public hearing.

B. *Required findings.* *Following a public hearing conducted in compliance with Chapter 17.96 (Public Hearings), the Commission shall approve a COA for the demolition of a historic resource only in conjunction with the concurrent approval of a proposed replacement project, and only after first making all of the following findings:*

1. *The historic resource cannot be remodeled, rehabilitated, or re-used in a manner that would allow:*
 - a. *A reasonable use; or*
 - b. *A reasonable rate of return.*
2. *The repair and/or renovation of the historic resource is not feasible or the Building Official has determined that the structure represents an imminent safety hazard.*
3. *Disapproval of the application will diminish the value of the subject property so as to leave substantially no value.*

Again, as stated in the City's Staff Report, *"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."*

The City's own Staff Report went on to state: *"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."*

The designation of Dry shed #4 as a historic landmark would in fact represent a taking of our property as it would render the building and surrounding property unsalable. As the City's Staff Report detailed and time has shown, there is no economically viable rehabilitated use of this building, nor would an entity choose to take on such a deteriorated and dilapidated building if also required by law to continue to maintain and repair the structure in perpetuity. By demolishing the building, it significantly increases GP's and any subsequent property owner's ability to repurpose the land parcel on which it resides for a wide variety of potential future uses.

11. Lastly, the City's Staff Report stated the following with respect to the City's potential ability to designate Dry Shed #4 as a historic landmark:

"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."

From the discussions held at the planning commission public hearing, it seems clear that the resolution to nominate Dry Shed #4 as a historic district was a direct attempt to enact new requirements for the sole purpose of denying an otherwise valid permit application.

While we do not have any interest in being adverse to the City, and we certainly understand the strong feelings some members of the public have expressed regarding Dry Shed #4, we have to take steps that are designed to enhance the property and allow us to put it back into productive use. Those steps also include the use of whatever legal recourse is available to us. We sincerely hope we can avoid that path.

We appreciate your consideration of the facts and findings summarized above, and trust that the Planning Commission will recognize the real need for the project and make the responsible determination.

Sincerely,

A handwritten signature in blue ink that reads "Michael Hassett". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael Hassett

cc: Traylor Champion, Georgia-Pacific LLC
Dave Massengill, Georgia-Pacific LLC