

## Response to Georgia-Pacific representative J. Michael Davis Letter

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To the Honorable Mayor Peters and City Council Members,

Regarding the letter dated February 23, 2018, by J. Michael Davis of Georgia-Pacific:

This letter requests that the City Council reject my appeal and uphold the Planning Commission's decision approving dry shed number 4 coastal development permit and demolition. The letter claims that the structure is not "historically significant and poses a risk to public safety," and that "[f]urther remediation and structural renovation efforts are not feasible due to the condition of the building and cost considerations." I will address these claims below.

### Historic

A false claim is made in the content that, "[t]he appellant concedes that the Dry Shed Number 4 does not merit historical designation." I can only assume this is stated because in my appeal I wrote, "[w]hile I am not asking for historical designation, it does qualify as a very recognizable and important structure to this community." What I mean by this is that I am qualifying that there is reason to consider it historic and should be revised at the most prudent time. Although I do not know why this is stated by Mr. Davis for sure, I wanted to clarify that this is absolutely incorrect; in fact I aver that this building (from here on designated as the C. R. Johnson Legacy Shed or Legacy Shed for short) has ALREADY been recognized as historic. The Legacy Shed was one of the twenty-two buildings considered eligible as/and contributing to, the Georgia-Pacific Lumber Mill Historic District. Julianne Polanco of the State Historic Preservation Officer explains that, "The Georgia-Pacific Lumber Mill Historic District was originally recorded by TRC in 2003 as containing 22 contributing buildings and structures," and that they were, "recommended eligible for listing on the National Register of Historic Places (NRHP) through an evaluation that was made under the California Environmental Quality Act (CEQA). Since the initial recording, 21 of the buildings have been demolished and the only remaining structure is Dry Shed #4." The fact that this is the last remaining building named as part of the historic district makes it even more rare and valuable as a historic resource. The claim that because this is the last surviving building within the historic district disallows its designation as a historic is false.

Under the section, *Substantial evidence demonstrates Dry Shed Number 4 is not a historic structure*, the G-P letter sets forward that, "Chapter 17.74 of the Fort Bragg Coastal Land Use and Development Code is the Historic Resource Protection Ordinance, Section 17.74.30 provides that the Council may designate an improvement or site as a historic landmark or any area within the City as a historic district based on the Council's evaluation of the age of the structure, distinguishing characteristics, distinct geographical area, familiar visual features, significant achievement, and/or other distinctive features." The letter continues in attempt to

put forward the case that the Legacy Shed is not a historic resource and that, “No evidence exists to the contrary.”

Here is factual evidence and points that supports the C. R. Johnson Legacy Shed as a historic resource:

- \*It was literally declared part of a the Old Mill Historic District (OMHD).
- \*It has the special achievement of being the last remaining building of the OMHD.
- \*The C. R. Johnson Legacy Shed is a very distinct, unusual, and recognizable structure with distinguishing characteristics and known familiar visual features to our community. It can be seen and recognized from many vantage points. Furthermore the building core structure is made with extremely remarkable materials, such as finely crafted and high quality old growth coast redwood trees.
- \*The Legacy Shed is undoubtedly an important element in the nexus of the Fort Bragg logging history, related achievements, and close to other historically important buildings such as the Guest House Museum and Skunk Train related structures.
- \*The 22 buildings of the OMHD, which this is the last remaining (and the old mill site) is directly associated with C. R. Johnson, the first mayor of Fort Bragg (1889); which city itself is considered a historic landmark by the California Office of Historic Preservation because the Fort named after General Braxton Bragg by the man that came to be the Brigadier General Horatio Gate Gibson, 3rd Artillery, was erected within the vicinity.



### **Debunking the false narrative that the C. R. Johnson Legacy Shed is not historic**

Julianne Polanco (State Historic Preservation Office) in his letter to Rick M. Bottoms that, “the COE has recommended the Georgia-Pacific Lumber Mill Historic District (P-23-004385) as not eligible for listing on the NRHP, due to lack of integrity as most

of the buildings are non-extant,” and that he concurs with this. In essence, that because 21 of the 22 buildings no longer exist, the LMHD is no longer viable. That, even though there remains 1 building of close to 70,000 square feet, it alone is not enough to keep intact a qualifying historic district. However, even if these conclusions are correct, it does not negate the potential for the Legacy Shed to be declared a historic landmark by the City of Fort Bragg as the Historic designation has already been bestowed upon the building. If a medieval squire is knighted in ceremony and later all other knights of this round table fall in battle, it might mean that the troop disbands, but not that the warrior is no longer a knight. Katherine Anderson (Architectural Historian/ESA) then makes the far stretched leap that, “[a]dditionally, Dry Shed #4 does not possess the historically significant associations to be considered eligible as an individual historical resource,” ignoring the obvious significant historical qualifiers the Legacy Shed has. J. Michael Davis of G-P continues to rely on this “lack of integrity of the buildings,” argument, yet recall that this lack of integrity is simply described as the other buildings being gone. Mr. Davis points out that the planning Commission voted on October 11, 2017 and November 8, 2017 to recommend that the Legacy Shed not be designated a historic landmark, yet recall that the Planning Commission first voted to designate or recommend “Dry Shed Number 4” as historic initially. I am very concerned that the public was not given enough notification that the initial vote would not count and that the extraordinary action of calling for a revote, was not met with equal public notification or explanation. I believe the Planning Commission and City Council were influenced by “propaganda by exaggeration” and distorted set of facts without a clear explanation of the historic relevance of the Legacy Shed. That there may have been multiple violations of the spirit of the Brown Act and that this issue needs to be revised by the council.

***The evidence is clear and substantial in this regard, that the building is of historical significance to the City of Fort Bragg California and should be declared and registered as a Historic Landmark or New Historic District Made within the Nexus of Skunk Train Depot and other relevant structures. The C. R. Johnson Legacy Shed is a Historic National Treasure!***

### **Economic Feasibility**

Georgia-Pacific represented letter in section: *Preservation of Dry Shed Number 4 is not economically feasible*, states that, “Under California Coastal Act, the City may deny an application for a CDP to demolish a structure only upon finding, based on a preponderance of the evidence, that retention of the structure is feasible,” which is defined as, “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” Please note also that one of the causes of the buildings deteriorated stated, is the self inflicted wound of “limited recent maintenance.” Although Mr. Davis quotes the estimated cost of \$4 million to complete the work for reusing the Legacy Shed as an industrial art center, it does not reference in detail the Tom Pryor (Electric & General Contracting) cost estimate of Dry Shed #4 structural

retrofit. The total estimated cost is for \$951,635 with \$553,600 of it being for install and finish of a 70,000 sq. ft. concrete slab. So without redoing the base concrete slab, the costs for retrofit would total under \$400,000 (\$398,035). Furthermore, the *Structural Evaluation of Georgia Pacific Mill Site Storage Shed #4* document by Michael Butler (Civil Engineer) dated August 17, 2009 finds on page 5 that “the floor in shed #4 is not level, but it largely follows natural grades...it is less than 1% slope (0.89%),” and that, “pouring new slabs throughout the building would not have to be necessary from a structural perspective if there are users of the building that would not require a new level slab on grade. The existing asphalt paving is in good enough condition for forklifts, etc.” This economic information along with the known interested parties in completing the retrofit (such as Skunk Train Depot, etc.) shows that the Legacy Shed can be retained and successfully done within a reasonable period of time and completely remediable.

Also of note in the structural evaluation is that, “the primary and most secondary structural members are of old-growth or good quality second-growth redwood,” and that, “from a structural perspective Shed #4 can continue to serve the city’s intended purpose for several decades more with the retrofit measures proposed in this report.”

### ***Structural Integrity, Safety, and the Public's Best Interest***

Assistant General Counsel J. Michael Davis puts forward under: *Dry Shed Number 4 is structurally deficient, and it is in the public's best interest to demolish the structure* that, “the structural integrity of Dry Shed Number 4 is substantially compromised and in decline,” and remains a, “serious risk to the health and safety of our employees...” He references that Kennedy/Jenks consultants report significantly degraded materials. Beyond demolishing the Legacy Shed, have other options been explored to limit safety risk such as reconnecting the water to the sprinkler system or otherwise? Although it is clear that these claims of lack of structural integrity are overblown and only relevant to a small and veneer portion of the structure (not the core), if the current condition truly creates an unsafe public nuisance that must be abated, then the property owner has not ensured the properties are well maintained. Did the City ever encourage or require proper maintenance of the property in the past? If not, I suggest that a “demolition by neglect,” permitting process is not ideal within governance and in-fact undermines it. It may be that Georgia-Pacific finds interest and benefit to the demolition of the Legacy Shed, yet the public's best interest (and G-P's) is to find a solution which benefits all related parties while leaving this incredible structure intact and ready for reuse.

### **Intention**

In closing, J. Michael Davis asks for the rejection of my appeal and submits that they, “intend to begin demolition as soon as feasible...” If this was a simple case of a property owner fulfilling their rights and responsibilities I would not appeal. I have the utmost respect for Georgia-Pacific, related parties, and their property rights;

however there are also other multiple substantially invested stakeholders related to the Legacy Shed. This is a very complex situation that had extremely flawed political process and systematic failures along the way that should be addressed. It is my intention to support a none adversarial negotiation with results that engender successful outcomes for Georgia-Pacific, the City of Fort Bragg, and the community at large.

I ask how much time, effort, and money it would cost to rebuild anything even remotely similar to the Legacy Shed? As Mayor Lindy Peters pointed out...**Once the structure is torn down...there is no coming back.**

I ask that you attempt to gain the best understanding and with wide vision the decision before you while considering the appeal and do not move forward to permitting the demolition of the truly invaluable, reusable, and historic C. R. Johnson Legacy Shed.

Submitted on behalf of the "8th Agency"  
(We the People).

Thank you for your attention in these matters,  
Gabriel Quinn Maroney, MS (Global Health)

