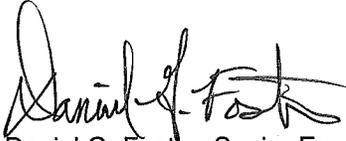


Memorandum

To: CEQA Administrative Record

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Subject: Fawn Lodge Forest Fire Station Replacement Project
CEQA Compliance - Initial Study/Mitigated Negative Declaration
State Clearinghouse (SCH) Number 2009092043
Proposed Demolition of Two Historic Buildings
Results of Feasibility Analysis Considering Alternatives to Demolition

Introduction

The California Department of Forestry and Fire Protection (CAL FIRE) is nearing completion of an environmental impact analysis of the above-listed proposed project pursuant to the California Environmental Quality Act (CEQA). The proposed project initially included a plan to demolish two historic buildings which exist at the project site. These are the (1935) Paymaster's Office and the (1935) Kitchen/Messhall. Both of these buildings are associated with the California Conservation Corps (CCC) work camp which was built on this site in 1935. Due to the small size of the buildable area and the proximity to a sensitive watercourse at the existing forest fire station (Grass Valley Creek), the initial plan called for the demolition of both buildings to make room for the new construction. There simply was not enough room on-site to rebuild the needed facilities upon the small building site without demolishing and removing the two historic buildings.

Both buildings are potentially significant historical resources and their proposed demolition was evaluated as part of the environmental review process required by CEQA. The proposed demolition is discussed and analyzed in the Initial Study/Mitigated Negative Declaration (IS/MND) supporting the proposed project. The CEQA document was circulated for public and agency review for a 30-day period from September 14 to October 13, 2009. Several letters of comment were submitted to the Department during the public review period. Many of these letters urged CAL FIRE to recognize the exceptional historical values associated with these buildings and to try to change the project, if possible, in order to save one or both of the historic buildings.

In 2001 CAL FIRE adopted a statewide Management Plan for its Historic Buildings and Archaeological Sites (Foster and Thornton 2001) which is supported by the certification of an Environmental Impact Report (Foster and Sosa 2001). The Management Plan contains specific procedures which must be followed prior to demolition of significant historic CAL FIRE buildings. One such procedure, discussed on pages 40-45 of the Plan, requires CAL FIRE to complete one final feasibility analysis to consider alternatives to demolition. The evaluation must consider the following four alternatives in this priority order: Adaptive Re-use, Transfer of Ownership or Management, Relocation, and Management as a Standing Ruin.

Acting upon consideration of comments received during public and agency review of the draft CEQA document, and to carry-out the above-listed requirement in the Plan, CAL FIRE completed a feasibility analysis which considered alternatives to demolition of the two historic buildings. The Department has also made a decision on which option it will carry-out. The purpose of this memo is to document the results of that feasibility analysis and record the Department's decision regarding the historic buildings.

Significance of the Two Buildings

Both of the buildings were constructed in 1935 by the CCC for use in the Fawn Lodge CCC Camp which was built at this location during that year. Research into the history of this particular camp was initiated by the Department. CAL FIRE's consulting historian Mark V. Thornton recorded the Fawn Lodge Forest Fire Station facility as part of his statewide inventory of pre-1946 construction (Thornton 1994 141-145, 617-618). CAL FIRE's consulting archaeologists completed additional cultural resource surveys and impact evaluations of the proposed project during the CEQA Initial Study (Napton 2008, Napton and Greathouse 2008a, 2008b). A separate report documenting the results of investigations related to historic CCC Camp Fawn Lodge is in preparation and will soon be completed. These studies evaluated the historical significance of the two buildings as follows:

(1935) Camp Paymaster's Office

This building served as the CCC camp paymaster's office. After the close of the work relief programs in 1941, most of the CCC facilities at Fawn Lodge were removed but a core group of buildings were retained. The facility was formally developed into a California Division of Forestry (CDF) forest fire station in 1953. The old CCC Camp Paymaster's Office became a fire captain's quarters, sometimes also referred to in the old records as a guest house. The office building is based on the USFS-CCC "E" working plan series. It is the only 21' x 25' CCC era office in the CDF (now called CAL FIRE) building collection. There are very few CCC offices left in the CAL FIRE property inventory. The building has a high degree of historical architectural integrity. The natural setting has changed little over the years, and the building appears to be in remarkably good condition. It has been rated as "3S" which means the building appears eligible for listing on the National Register of Historic Places as a separate property.

A brief inspection of the office was recently made by CAL FIRE Archaeologist Richard Jenkins and CAL FIRE Construction Supervisor Lee Thomas who made the following observations. The siding, windows, front and back doors, and the back porch all appear original and are in relatively good condition. Two window panes have cracks and will need to be replaced as will some of the siding boards. The front porch has obviously been replaced and should be rebuilt following design elements exhibited on the back porch. The north, south, and west foundations consist of wood beams set on concrete or stone pier blocks. Some of these beams may need to be replaced. A full length concrete footing supports the east wall. The existing wood shingle roof is 95% intact and should survive another winter.

The wood sheathing under the roof has deteriorated and is in need of replacement. More research is needed to determine if wood shingle roofing is authentic and if so, the shingles should be replaced with equivalent materials matching the original construction as closely as possible. The structure is currently painted with a two-tone pale green (top) and cream (bottom) paint scheme which does not appear authentic. The paint is peeling in some areas. Observations made under the peeling paint suggest that a dark green may have been the original color. More research is needed to confirm the original color, but the building will be re-painted with a protective coat of paint following the repairs made during project construction. The color will match the original color as closely as possible, following additional research to be conducted by the Department.

(1935) Kitchen/Messhall

This building was extensively remodeled in the 1960s which greatly changed its historic appearance (Thornton 1994:145). There are five other combination kitchen and messhall buildings in the CAL FIRE property inventory that date from the CCC era. They have all been modified to one extent or another. Despite the changes, the building still retains some of its historical character. It has been rated as "5N" which means not eligible for listing on the National Register of Historic Places but needs special consideration for other reasons. The building does not possess a high degree of historical integrity because its current appearance is significantly changed from its original construction.

Both buildings have historic significance because they are the last surviving elements of 1935 CCC Camp Fawn Lodge, but of the two, the office is more valuable as a historical resource.

Meeting in Sacramento

A meeting took place at CAL FIRE's Sacramento Headquarters, Technical Services and Engineering Unit, 1300 U Street, Sacramento, on October 22, 2009. The purpose of the meeting was to explore the feasibility of alternatives to demolition, and if possible, to reach a final decision regarding these two buildings. The following

Department staff and management personnel were present:

Curt Karlin, Chief, Technical Services and Engineering
Mike Chuchel, Unit Chief, Shasta-Trinity Unit
Don Clark, Supervising Engineer
Becky Beauchene, Project Director
Dan Foster, Senior Environmental Planner
Mike Duggan, Senior Civil Engineer
Mike Scarbrough, Associate Civil Engineer
Garrett Stroup, Junior Civil Engineer

The meeting began with a discussion by Don Clark who presented the findings from his Engineering team who had been working for the preceding two weeks on possible re-design options of the Fawn Lodge project site to explore the feasibility of preserving one or both of the historic buildings on site. The engineers reported on the difficulties in accomplishing the Department's operational needs upon such a small site area. Many of the possible re-design plans which were considered either sacrificed important parts of the project or created additional environmental impacts. One problem with re-positioning the new buildings to avoid one or both of the historic buildings, is the impact to flow-through circulation into the facility, around the buildings, and through the apparatus building. Dozer-transports require more room than engines for access, turn-around, and exit.

Another engineering problem involves the construction of the lower parking area. The further that parking area is re-positioned away from the upper station, the more its elevation drops. This presents two problems. One concern is to avoid disturbances to the creek and the riparian habitat adjacent to Grass Valley Creek. Another problem relates to the grade of descent required to drive down to the lower parking area. The engineers tried to use the existing flat area as much as possible and minimize the use of imported fill (and retaining walls) and minimize cutting into hillsides to expand the buildable area to avoid the environmental impacts which would result.

In spite of these constraints and problems, the engineers were successful in developing a revised site plan which would retain the office (but not the kitchen/messhall) and includes a new facility which meets the Department's operational needs and avoids significant environmental impacts. That plan is further discussed below.

Alternative #1 – Adaptive Re-Use

The Department considered the possibility of keeping both historic buildings on-site with the objective of putting the buildings to use as part of the operations of the station. For example, it might be possible to keep the (1935) kitchen/messhall, upgrade and modernize the building, and re-use it as a new kitchen/messhall facility. Unfortunately, the existing wiring, plumbing, and structural integrity are so far below current code requirements (even when using the Historic Building Code) that it would necessitate almost complete dismantling and rebuilding to construct a new facility that meets current building code and operational needs. The end result would not be the same historic building and it would be more costly to build it this way.

This is also true for the office. The possibility was discussed to utilize the office building as a weight-lifting room as part of the new facility. To meet current code, any kind of formal use would require a substantial upgrade to the strength of the building, changes required for compliance with the American Disabilities Act, and windows which are energy efficient. These changes, which would be required if the office were put to functional use within the facility, would ruin its historical integrity.

The engineering staff was successful in developing a re-design plan which meets all the operational requirements and will keep the office but not the kitchen/messhall. There was not enough room to keep both and the Department elected to preserve the office, but its use will be limited to its function as a museum, to maintain a physical presence of part of the old CCC Camp Fawn Lodge, but not a functional part of the station. The Department committed to making a series of repairs to the office building, under the guidance of our Senior State Archaeologist (to maintain historical integrity), which will be carried out during the time of the construction of the new facility.

Alternative #2 – Transfer of Ownership or Management

The Department considered the possibility of selecting another piece of property to build the new facility, but this alternative was rejected because of the significant increase in the cost of the project, the additional time required to seek funding and approval to acquire new property, and the fact that the various parcels which were available did not meet CAL FIRE's operational needs.

A property owned by Caltrans located near Buckhorn Summit right off of Highway 299 was initially considered as a possible site to relocate the station. After cursory review this parcel was rejected for environmental reasons. The property has been used as a vehicle maintenance yard and the soil is highly contaminated. Choosing this site for the new station would have required a major clean-up effort. The Department did not wish to accept the liability or the substantial increased cost for the clean-up. Costs and staff time associated with CEQA-compliance was also a factor in rejecting this alternative.

The State owns 80 acres of land behind the existing Fawn Lodge Forest Fire Station and one possible alternative site was considered upon these lands. This site also was rejected for environmental reasons. It would require a major reconstruction of the access road which is located within the Watercourse and Lake Protection Zone (WLPZ) along Grass Valley Creek and Phillips Gulch. These streams have special erosion-control restrictions due to their sensitive, highly-erodible decomposed granite soils in the watershed. Grass Valley Creek also supports Coho Salmon and Steelhead, and needed road reconstruction would potentially result in significant environmental impacts to the anadromous fish habitat. The State chose to remain on the existing compound to avoid those impacts.

A third potential parcel for a relocated station is located close to the community of Lewiston. This parcel was considered but rejected because of the impact on incident response times. The current station location provides the best response to the Direct Protection Area (DPA) that CAL FIRE protects in Trinity County. In 2007, CAL FIRE relocated the Weaverville Station (60) to Highway 3, approximately four miles north of Weaverville. The two engines at Fawn Lodge often respond to the Highway 3 and 299 corridors west and south of Fawn Lodge Station. With the new location of Station 60, responses to these locations are better strategically served from Fawn Lodge Station's current location.

Even if the State was successful in finding an alternative site for the station, there is no guarantee that relocation would result in preservation of the two historic buildings. This alternative might have resulted in the preservation of both historic buildings if the new landowner chose to save them and had the means to do so. It is also possible that both buildings would have been demolished by a new landowner or have been ruined over time through neglect and lack of maintenance. All things considered, transfer of ownership or management is not a feasible alternative.

Alternative #3 – Relocation

One problem with relocation in moving either building from the existing station to a new site involves the fact that the building would need to be transported over the existing Bailey bridge which is limited by the weight and type of vehicle it can safely support. The buildings would need to be dismantled into pieces, relocated across the bridge to a new site, and reconstructed. CAL FIRE considered this infeasible for the kitchen/messhall. The cost would be significant and the end product of limited public value. The value of this building lies in its ability to contribute to the aesthetic and historical quality which is found in the presence of two CCC camp buildings still located in their original position.

Relocation is a more feasible alternative for the office but still would have required dismantling and reconstruction to get it across the bridge. This would have reduced the building's historical integrity and a complete loss of integrity of the setting. The option of relocating the office building would have been considered as the best alternative if the Department had not found a way to save it on site.

Alternative #4 – Management as a Standing Ruin

This option is rarely possible as a feasible alternative at any CAL FIRE facility due to the issues of exposure to risk of liability. It is occasionally used, however, such as at the Cat Barn at Jackson Demonstration State Forest, when circumstances allow it. For this project, it would require CAL FIRE to build the new facility on another property, retain ownership of the old station and allow the buildings to stand at an abandoned facility. Maintenance would be discontinued and the buildings would eventually become unsafe to enter. The buildings would need to be fenced-

off to keep the public safe. Trespassing and vandalism would likely become a management problem during the non-fire season when the new station is not staffed. This management option is not feasible at this particular site.

Conclusion

This memo documents a feasibility analysis which was recently completed by CAL FIRE to explore the various alternatives to demolition of the two historic buildings. CAL FIRE is required to complete this study as specified on pages 40-41 of the Management Plan and such a study has been carried out and documented. As stated above, CAL FIRE was successful in finding an alternative. The historic office will be saved on-site; repairs made during project construction, and will be maintained and repaired over time to the best of the Department's ability to do so. The historic kitchen/messhall will be demolished. The requirement to prepare a supplement the Historic Building Site Record, discussed on page 41 of the Plan, has been fulfilled.

CAL FIRE's Management Plan for Historic Buildings and the accompanying Environmental Impact Report require consideration for four alternatives to demolition. I believe these alternatives have been adequately considered and I concur with the Department's conclusion that saving the office, *in situ*, is the best and most feasible alternative.

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