

SCA Paper

CITY OF FLAGSTAFF HERITAGE PRESERVATION COMMISSION STAFF REPORT

Phase -1 Cultural Resource Review

PZ-20-00071-01

Address: 1600 Butler.

DATE: November 9th, 2020

MEETING DATE: November 18th, 2020

REPORT BY: Mark Reavis, AICP, NCARB

BACKGROUND

The facility most recently known as SCA Paper has an extensive history that even spans beyond the production of paper products. The site has a relationship to the railroad as well as early ranching with remnants within the complex of buildings when it started out as a slaughterhouse. The utilization of the property first as a slaughterhouse by Babbitt Brothers Trading Company and subsequently seven pulp and/or paper companies were involved with the property over time. The facility initially utilized the areas timber resources of smaller trees but ultimately was self-reliant using 100% recycled products as bulk pulp even after the timber industry shutdown. It further shined as an early example of sustainability by recycling most of its water and being supplied with treated city wastewater and discharging little. The responsiveness to changes led to successes in running a pulp mill in an arid climate.

The site was once on the outskirts of town and is now within the urban boundary and a developing business corridor. The industrial site has been purchased for development as a retail site with the phase-1 development secured for a well know business and the phase-2 tenants yet to be secured. The applications for development propose clearing the site of all existing buildings. Many of the buildings on the site have been modified over time to meet the needs of the paper manufacturing processes. The removal and salvaging of equipment reduces the ability to understand the process fully, but the flow of the manufacturing process is still apparent. The history associated with this major industry is important to preserve in a documented form.

Much of the complex has lost its historic integrity with its many modifications. There is one building though that stands alone and retains its industrial integrity even without its equipment. The main paper production building (1964-1965) is an impressive concrete frame that is expressed both on its interior and its exterior. The concrete enclosure of high-bay space has a floor area of approximately 53,000 square feet or 1.2 acres. The primary paper production building retains its industrial architectural integrity.

PREVIOUS HP DECISIONS

This property has not been previously evaluated or had related Heritage Preservation determinations.

REQUEST

This is a request to review the Phase-1 Cultural Resource Report (**PHASE 1 HISTORIC RESOURCE STUDY FOR 1600 E. BUTLER AVENUE IN FLAGSTAFF, COCONINO COUNTY, ARIZONA**: Subject Property SCA Tissue, APNs 104-07-001C and 104-07-005M. Prepared by Cornerstone Environmental Consulting, LLC

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The Phase-1 Report is extensive and comprehensive regarding its historic content, history of the site and its paper industry and its relationship to Flagstaffs development and its people. The Commission review will need to determine if the report is sufficient mitigation to move forward with the development of the site and the demolition of the structures. The Heritage Preservation Commission has the sole authority to approve the report with consideration of the Secretary of the Interior Standards for evaluating historic properties.

STAFF RECOMMENDATION

Staff recommends that the Heritage Preservation Commission (HPC) review the report to become familiar with its content. The HPC is to listen to the consultant's presentation of the report, a presentation that has been requested by the Heritage Preservation Officer (HPO). The HPO has also asked the consultant to inform the developer of their recommendations and of the upcoming HPC meeting. The HPC may ask the consultant any relevant questions regarding their determinations made in the report. Staff does not recommend acceptance of the report at this meeting so as to allow for a thorough review of the report, consideration of HPC questions and additional input from the applicant and/or consultant.

Staff recommends that the HPC provide additional inquires to clarify report determinations of building historic integrity and site development. The HPO recommends additional questions and considerations:

- Is the report substantial in scope and meets the Secretary of the Interior Standards?
- Is the report sufficient and appropriate mitigation, either in the execution of the project or as a separate mitigation product?
- Is the report in a form that returns the lost value of the resource to the public or supplemented in another publicly accessible form?
- Has the paper plant's concrete structure, noted as Building #3, been fully evaluated structurally and excluded from adaptive reuse?
- Should the applicant be asked to further describe and confirm the phased development of the site and what tenants have and have not been secured?

INTENT & PURPOSE

The intent of the preparation of Cultural Resource Reports is to preserve historic aspects of the community in report form with the requested demolition of a historic property. Cultural Resource Reports are intended to fully mitigate the loss of a historic property. The Secretary of the Interior's Standards are incorporated into evaluation requirements for required research and documentation purposes.

The purpose of Heritage Preservation as noted in division **10-30.30.010** is to protect and enhance the cultural, historical, and archaeological heritage of the City of Flagstaff by recognizing, preserving, enhancing, and perpetuating the use of those objects, structures, sites, and landscape features that represent distinctive elements of the City's cultural, political, architectural, and archaeological history.

Cultural resources are an important consideration in an application for development. Professionally prepared cultural resource studies are therefore a requirement of an application for development. The type and format of studies required are determined based on the particular circumstances of the property on which development is proposed. Cultural resource studies assess the significance and integrity of potential

resources, major impacts that would result from the proposed work and mitigation measures that could eliminate or offset any major impacts. This section provides detailed requirements for cultural resource studies and explains how such assessments are performed.

A. **Cultural Resource Studies.**

1. **Purpose.** To identify significant cultural resources and potential impacts of proposed development so that mitigation measures can be established for major impacts prior to development of the property.

2. **Applicability.**

a. Cultural resource studies are required for all public and private developments involving:

(5) Structures over 50 years old at the time of application.

Scope of Work

The primary considerations for this level of review.

10-30.30.050 3. **Specific Application Requirements.**

a. **Types of Studies.** Upon consultation with the Historic Preservation Officer and based on the resources that are known or likely to be present, the applicant shall provide an archeological resource study and/or a historic resource study.

b. **Preparation.** Cultural resource studies shall be prepared by professionals qualified in accordance with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation ([36 CFR 61](#) Appendix A) as currently amended and annotated by the National Park Service.

c. **Report Format.** The Historic Preservation Officer will work with the professional conducting the study to determine which one of the report formats is appropriate. *The resources present at the site did not dictate a simpler "Letter Report". At a minimum a Phase-1 Cultural Resource Study was required by the HPO.*

(2) **Phase 1 Cultural Resource Studies.** When a letter report is not appropriate, a Phase 1 Cultural Resource Study shall be prepared. A Phase 1 Cultural Resource Study shall:

- (a) Identify the presence of cultural resources;
- (b) Evaluate the potential for additional cultural resources being discovered;
- (c) Assess the significance of identified and potential cultural resources;
- (d) Assess the integrity of identified resources;
- (e) Assess identified and potential impacts proposed;
- (f) Provide measures to mitigate major impacts on cultural resources; and
- (g) Advise whether Phase 2 or Phase 3 Cultural Resource Studies will be required.

(3) **Phase 2 Cultural Resource Studies.** A Phase 2 Cultural Resource Study is required when major impacts are proposed for a significant resource that has integrity and when no other mitigation measures are proposed that would maintain the significance and integrity of the resource. *This question*

of additional requirements has not been determined at this time and requires additional consideration by the HPC

DISCUSSION

COMMUNICATION BACKGROUND

The applicant's heritage consultant contacted the Heritage Preservation Officer (HPO) noting that they had been retained by the property owner. Within initial IDS review it was noted that at a minimum a Cultural Resource "Letter Report" was required, however, this initial assessment was modified with an HPO visit to the site with the consultant. The HPO made the determination that a Phase-1 report would be required and the results of that report after HPC review will determine further actions.

HISTORIC ERA INTEGRITY

The Heritage Preservation Officer Mark Reavis, AICP, NCARB has reviewed the property and has determined the main production building (called out as Building 3) retains strong integrity in design for a mid-century modern design. Constructed in 1964-65 the concrete building exhibits many mid-century design aspects in structural concrete and pre and post tensioning reinforcement. Mid-century modern architecture has gained recognition in historic preservation and is inclusive in advancements in early structural design processes that are significant.

The report does acknowledge that structural issues existed through the building's utilization. Deterioration of the concrete and reinforcing has been attributed to the high-humidity conditions involved in paper production. Shifting of the concrete frame to the north was addressed with the addition of 17 large and prominent X-brace steel frames installed per engineering standards in 1995. Past problems have been noted, but a structural engineers report on the building safety and condition has not been provided.

ARCHITECTURAL DISCRPTION:

Though appreciation of mid-century design and construction may not have reached a point of 1900 era architecture the paper production building does possess modern design principles, materials and structural detailing that fully represent its time period of construction in the mid-1960s. Concrete structural components are uniquely expressed on the exterior of the building as readable features. On the interior the high-bay hall with the overhead crane features the elegantly formed concrete tapered structural columns. The craftsmanship of these formed in-place columns is impressive and are the defining features of the space. The large steel X-brace frames added in 1995 have added to the architectural structural expression of the building.

Basis of Report:

The information in this summary report was derived from the application to the Heritage Preservation Commission for the preparation of a Cultural Resource Report, the Flagstaff Zoning Code, The US Secretary of the Interior Standards for the Treatment and evaluation of Historic Resources and other Historic Preservation Resources and evaluation experience.

Evaluation of Effects

The evaluation of effect is not recommended at this time, not until after full consideration of findings by the consultant with regard of the proposal and resource report may the project be considered for

acceptance of the report finding.

OPTIONS FOR COMMISSION DECISION-MAKING:

- 1) The Commission could accept the conclusions of the Cultural Resource Report and require no further actions or requirements.
- 2) The Commission could hold off on determinations until next regularly scheduled meeting reviewing the report and information presented at the Commission meeting. (Staff Recommendation)
- 3) The Commission could request modifications, additional information or phases in the report and to include them as conditions of approval – or –
- 4) Request a Phase 2 Cultural Resource Study be prepared by the applicant.



