

To: Permit Sonoma
Attn Brian Oh

From: The Glen Ellen Historical Society

Subject: Comments/Response re: Eldridge Draft EIR/Specific Plan

The Specific Plan process, which was touted to be a community driven plan, has most definitely fallen short of its vision. The creation and implementation of the Planning Advisory Team (PAT), which was intended to be 'the voice of the community', appears to have had no voice at all. A general consensus of the local community, with over 2000 valley residents signing a petition in agreement, has resoundingly rejected this Proposed Plan. Regardless of the continual outcry and input provided from the public, the County sits steadfast on its position with this grandiose and elaborate plan. It's apparent that this plan is geared toward addressing the State's housing problem by constructing as many houses as possible on this historic campus in an effort to achieve their unreasonable goal and quota. The County and State are determined to build a new urban style town in the middle of this historic and rural community of Glen Ellen. With a thousand homes, a hotel and large commercial enterprises, the County is relentlessly pushing their agenda regardless of the wants and wishes of this community. In the guiding principles of the Specific Plan Glen Ellen is characterized as an "adjacent town", when in reality the SDC property sits directly in the middle of this historic village of Glen Ellen. If this proposed plan reaches fruition as written, it will destroy the character of this quaint and picturesque village forever.

The Glen Ellen Historical Society has been a strong community advocate for the preservation and prudent management of the Eldridge Property formerly known as Sonoma Developmental Center. And while we continue pursuing the National Registry of Historic Places (NRHP) status for entire 940+ acres, we cautiously endorse the Historic Preservation Alternative as the **only** realistic and viable option available within this Specific Plan as written.

It is with great urgency that this organization stresses that the urbanization of Eldridge is not portrayed accurately. The Draft EIR does not stress or give any credence to the preservation of cultural integrity, history, conservation and housing in an appropriate scale. The inadequacy of the 'self-mitigated' Specific plan appears to have fallen short of CEQA. CEQA Guidelines mandate consideration and analysis for all alternatives and gives desired designation to the most environmentally superior alternative. (Section 15126.6)

Your analysis that; "Historic Preservation Alternative would be less superior in some environmental features such as energy use, biological resources, and wildfire risks." Is categorically untrue. There are many architects, including those within the National Trust for Historical Preservation, that express exactly the opposite view. Where is the data to support this claim?

Examples of this lack of analysis with reference to environmental impacts is evidenced by the sugar-coated language used throughout this document such as, '*if feasible*' or "*reasonably foreseeable*". Legally enforceable Mitigation and Monitoring should be included in every aspect of this DEIR that overtly states in most instances, "no mitigation needed.

With regard to the massive demolition suggested in this Proposed Plan, We find it unconscionable that this DEIR makes such outlandish claims. Below are just a few examples of the dozens listed as "requiring no mitigation".

3.8 Hazards and Hazardous Materials 3.8-1

- Implementation of the Proposed Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **No mitigation needed** (where is your data?)
- Implementation of the Proposed Plan would not create a significant hazard to the public or the environment through *reasonably foreseeable* upset and accident conditions involving the release of hazardous materials into the environment. **No mitigation needed** (demolition of old buildings releases huge amounts of embedded carbon into the atmosphere as well as releasing hazardous materials into the soil)
- Implementation of the Proposed Plan would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **No mitigation needed** (Blatantly incorrect. There are dozens of homes on Marty Dr and beyond that are fewer than a hundred yards away)
- Implementation of the Proposed Plan would not result in development located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment. **No mitigation needed.** (There are multiple dumpsites on-grounds that are questionable. Where is your data?)

5.3 Significant and Unavoidable Impacts

(We find these statements (below) to be totally unacceptable and we challenge the validity of your assessment)

5.3.1 Cultural, Historic and Tribal Resources

“Development under the Proposed Plan would potentially entail the demolition of at least 13 percent of historically contributing resources that were originally documented as part of the Sonoma State Home Historic District (SSHHD), which has been determined eligible for listing in the California Register of Historical Resources (CRHR) and qualifies as a historical resource under CEQA. Further, new construction under the Proposed Plan has the potential to disconnect the remaining contributing resources in the Core Campus from those in the Community Separator and Regional Parks lands to the east and west, disrupting the SSHHD’s overall integrity to the point that it would no longer be eligible for listing in the National Register of Historic Places, CRHR, or as a California Historic Landmark. This impact, in addition to demolition of the aforementioned resources would result in a substantial adverse change to the significance of the historic district such that the significance of the historic district would be materially impaired”

(It was expressed several times by Mr. Bhatia [Dyett & Bhatia] during the many virtual community outreaches that most of the older buildings on the west side campus are, in his words, “beyond repair”. Again, those assertions have no merit or data to justify such claims. Recently local architects, well versed in historic restoration, assessed many of the oldest buildings on the west campus and they agreed that very few of these historic buildings are beyond refurbishing. It is also a proven fact that it is less

expensive and environmentally preferred to refurbish and reuse existing structures than to demolish and rebuild)

Retaining the historic character of these 100+ year old buildings, together with their unique architectural styling is equally important, as referenced in the ***Environmental Analysis > 3.1 Aesthetics***, and again reiterated in the Specific Plan's "Guiding Principles":

"... to balance Development with Historic Resource Conservation. Preserve and adaptively reuse the Main Building and the Sonoma House complex, conserve key elements of the site's historic landscape, and strive to maintain the integrity of the historic district to the west of Arnold Driven by adaptive reuse of contributing buildings where feasible. Support a cohesive community feel and character, while allowing a diversity of architectural styles"

We (GEHS) feel that the Historic Preservation Alternative meets the fundamental project objectives listed on pages 5-6 of the DEIR. However, we also find that the Specific Plan is inconsistent with these fundamental project objectives, which calls for balancing development with historic resource conservation?

What are the performance-based standards to determine which buildings can feasibly be restored or adaptively reused? How is demolition of any building to be decided? What type of analysis and performance-based standards will be applied to permit demolition under the Specific Plan?

The removal of historic buildings is not something we (GEHS) take lightly. These old buildings are a major contributor and a part of the very fabric of our local community and beyond. We find that the lack of data regarding the structural integrity of these historic buildings is quite troubling, as well as the ease by which the County speaks of their removal. We found it necessary to refer back to the assessments of Wallace, Robert & Todd and JRP to find data on structural and seismic conditions as well as building materials condition. The assessment done by Diana Painter and Associates (2015) was also quite valuable in helping us understanding where these historic buildings stood structurally. With Page and Turnbull being one of your consultants, why is there no data available on current building conditions? It is obvious to us (GEHS) that these historic buildings are merely considered obstacles in the path of the County's Proposed Plan and that the general consensus of the community at large with their concerns regarding the scope and density of the Proposed Plan have simply been ignored or considered unfounded.

The Guiding Principles offer excellent insight and direction:

"Ensure that new development complements the adjacent communities of Glen Ellen and Eldridge and fits the character and values of the site and surrounding areas..."

Legacy of Care

From the beginning of the Specific Plan process the term, "Legacy of Care" has been used and continually tossed around without focus or purpose. Perhaps it is to show a willingness to recognize and acknowledge the 130 years of dedicated service and care to those with developmental disabilities.

Though it is heart warming to hear that SDC is being acknowledged and remembered by those who wish to replace it, this sentiment rings hollow with the absence of truly addressing the historical significance of California's first care facility for children with developmental disabilities. Dozens of times we've heard this term "Legacy of Care" used, yet never once has the County and their consultants expressed any interest or desire in creating a Historic Preservation Area - an area that would be dedicated specifically to the Legacy of this once great Developmental Center. The Proposed Plan makes suggestions of remembrances but has nothing of any substance to offer. Where is your plan to address this often-used term, "Legacy of Care"? It appears to be just a term used to console and placate those who truly care about the history of the old Sonoma State Home: The people who lived and worked there; the families whose loved-ones resided there; the local communities that flourished along side... It's these people, places and stories that truly constitute a vision of Legacy of Care. To the County and their consultants Legacy of Care appears to mean nothing, as evidenced by their lack of interest in preserving California History.

The Specific Plan make references to preserving the old administration building (PEC building 1908) and the Superintendent's residence (Sonoma House 1897) as evidence enough to prove that Legacy of Care exists in their plan. Ironically tho, these two historic building are already protected on the NRHP and as a County Historic Landmark, respectively. The County also has suggested in their Proposed Plan that these two historic buildings should be slated as part of the hospitality / hotel idea.

Is this really how the County wants to portray Legacy of Care? Does the County and State have *any* plans to respectfully acknowledge the existence of this historic care home? If so, what are they?

The Glen Ellen Historical Society has submitted multiple plans to address the indifference and unresponsiveness toward Historic Preservation. It is deeply concerning that these plans have never received a response or recognition of any kind. The willingness of the County to turn a blind eye on an area of such historical significances is worrisome.

Our (GEHS) plans are concise and well thought out. Our vision is simple. Establish a small Historic Preservation Area that includes a museum and library, a visitor's center and a small community conference and archive center. The proposed Historic Area would be strategically positioned at the location that is currently suggested as "The Firehouse Commons" in the County's Proposed Plan. Hospitality is the County's focus for this area. Historic Preservation is ours...

The County and Dyett & Bhatia have seen our plans:

"The Gateway to Sonoma Mountain and the Historic Cemetery"

This is what "Legacy of Care" **really** looks like.

In closing, the GEHS respectfully requests the following;

- A CEQA level identification of potential impacts of known or potential historic sites and landscapes.
- Consider the historic sites as an entire cultural landscape and not identify individual buildings individually to be demolished.

- Require a future developers to prepare a historic preservation plan, based on desired development and suitability of buildings for adaptive reuse, with the overarching objective of preserving a set of buildings that reflect the diversity of building types and the continuum of life at the former SDC. For instance, retain and reuse buildings that represent various architectural styles that are character-defining to the Historic District, including French Eclectic, Spanish Eclectic, and Tudor Revival, as well as character-defining materials such as tile roofs, stucco and brick cladding, and wood windows.

- Include a reference or rationale of why Sonoma County has not responded to a two-year-old application for Historical Landmark status for Eldridge.

- Explain how the demolition of buildings reduces the eligibility of the property for the National Register of Historic Places. The property application has been submitted by SHPO and the GEHS has been asked for additional and expanded information on the property, specifically the east side of Arnold Drive. According to the Draft not all buildings, structures, and landscape elements within the historic district boundary are considered contributing resources because some of them are outside the 1889 1949 period of significance and others do not have sufficient historical integrity. Due to the expansion of the historic district boundary as requested by SHPO, the number of contributing resources grew from 46, as identified in JRP's May 2017 report, to 94 buildings and structures. Where is any reference to Wallace, Roberts and Todd or Page and Turnbull or JRP and their findings regarding historical preservation of building and landscapes?

- Why is there no mention of historic preservation in the initial bullet points? The statement of Balance with Historic Resource Conservation is acceptable however it is qualified with 'where feasible.' What is the definition of the phrase 'where feasible?'

- CALFIRE identified the oldest fire suppression buildings in the State dating to 1931-2. The Eldridge Fire Department was built in 1932 yet it is not considered significant and one to be potentially removed. Then the plan calls the area Fire House Commons. Why will the area be named for a building to be remove as 'insignificant?'

- The Historic Core appears to consist of two buildings: The Sonoma House and the Professional Education Building. The buildings adjacent to them (Oak Lodge, Hatch and McDougall) are important representatives of early 20th century institutional care. This section is nearly contiguous with the cemetery and Jack London HISTORICAL State Park. Has there been any rationale to create a historic area within the property historic district and how the Department of Parks and Recreation could be expanded to include this historic area.

Thank you for your consideration. The Glen Ellen Historical Society looks forward to seeing your responses in the final EIR

Respectfully,

Glen Ellen Historical Society

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