



April 1, 2025

Sonoma County Board of Supervisors

Permit Sonoma

Re: Public Comment on the Compliance Review Process-Sonoma Developmental Center

The Glen Ellen Historical Society acknowledges that Permit Sonoma has accepted as COMPLETE the 4<sup>th</sup> application of Keith Rogal and Grupe for advanced planning on the Sonoma Developmental Center (SDC) site. This is of grave concern for historic preservationists such as the Glen Ellen Historical Society and our community.

In the plans, it appears that a massive demolition of over 90 % of the buildings is a goal of the Rogal-Grupe developers. It appears that the developers have chosen to disregard numerous citations, laws and professional opinions regarding preservation of historic buildings, sites or cultural landscapes of historic interest or value.

The history of the SDC site began long before the cornerstone Home for the Care and Training of Feeble-Minded Children was laid in 1891. The property was studied by experts WRT and HRP with the recognition that evidence of Native American presence occurred on the property. In 2001 LSA also cited pre-historic resources and some turn of the century mapping areas directly naming Native American presence. The GEHS also submitted a map to SSU archives that indicate Native American presence on the west campus in past decades.

As the planned demolition is planned to go 12 feet below ground surface it is suggested that the disturbance of areas could be in violation of Native American historical sites and needs more thorough evaluation. The GEHS suggests that any disturbances of California archaeological or historical interest or value may be in violation of the following California State Preservation laws:

Administrative Code, Title 14, Section 4308

**No person shall remove, injure, deface or destroy any object of paleontological, archaeological, or historical interest or value.**

As most of the west campus is considered of significant historic value, further professional study of re-purposing or adaptation of structures should be mandatory before any removal or excavation is allowed.

CCR Section 1427

**Recognizes that California's archaeological resources are endangered by urban development and population growth and by natural forces. The Legislature further finds and declares that these resources need to be preserved in order to illuminate and increase public knowledge concerning the historic and prehistoric past of California. Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archaeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor. It is a misdemeanor to alter any archaeological evidence found in any cave, or to remove any materials from a cave.**

§ 65351: Native American Involvement in General Plan Proposals

**Requires local planning agencies to provide opportunities for involvement of California Native American tribes on the contact list maintained by the Native American Heritage Commission, and others, in the preparation or amendment of the general plan.**

It is suggested that any Native American participation in the planning process be published to assure the public that all reviews are within the law.

§ 12600-12612: Attorney General- Environmental Action

**Permits the attorney general to intervene in any judicial or administrative proceeding concerning pollution or adverse effects on the environment. Authorizes the attorney general to maintain an action for equitable relief in the name of the people of the state against any person for the protection of the natural resources of the state from pollution, impairment or destruction. Includes historic sites in the definition of natural resources. Authorizes the court to hold the defendant accountable for the protection of natural resources of the state from pollution, impairment or destruction.**

The act of demolition of historic buildings in itself is a grave polluting factor that need to be addressed by environmental professionals. The release of carbon emissions upon destruction is extremely serious and should be recognized as a contemporary issue needing to be addressed. Permit Sonoma should be addressing this issue as well as the question of land fill and where the demolition debris will be placed. The high cost of demolition and new materials will be absorbed into the cost of new housing making the structures unaffordable. A study of the newer applications like second skin technology (used in Europe) is highly recommended both as a way to avoid the release of pollutants through massive demolition of historic buildings, opting instead for the adaptation and re-purposing of the existing buildings, and in the process protecting the vast natural resources of SDC including the wildlife corridor and the local human population.

§ 21084.1: California Environmental Quality Act- Historic Resources

**Establishes that adverse effects on an historical resource qualifies as a significant effect on the environment. Defines historical resource.**

Careful consideration should be made regarding CEQA in review of historical resources as well as effects on the environment with nearly 1,000 living units. Traffic, fire evacuation, landfill issues with demolition, water and sewer also need intense scrutiny by the reviewers.

§ 622 1/2: Destruction of Sites

**Establishes as a misdemeanor the willful injury, disfiguration, defacement, or destruction of any object or thing of archeological or historical interest or value, whether situated on private or public lands.**

CEAQ should be addressing the many historic resources and cultural landscapes that should be preserved as noted in the expert studies cited in the following :

**In 1979 Pat Archer and Carla Petris of the Sonoma League of Historic Preservation completed a basic narrative that recognized the history of the facility to demonstrate some level of concurrence with the State Office of Historic Preservation indicating a local awareness of the property's history and significance.**

**A second study in 1998 by Myra L. Frank and Associates produced the “Preliminary Historical Resources Evaluation-Sonoma Developmental Center” and found a ‘potential historic district’ eligible for the California Register of Historic Sites. \*\***

**The Glen Ellen Historical Society successfully initiated the inclusion of the brick Professional Education Building on the National Register of Historic Places in 2000.**

In 2001 LSA prepared the Cultural Resources Survey and cited the 1976 California Department of Parks and Recreation Inventory of Historic Resources; the Office of Historic Preservation's 1988 document Five Views (An Ethnic Historic Site for California and other documents and identified several pre-historic and historic resources and recommended they be formally evaluated by the State of California.

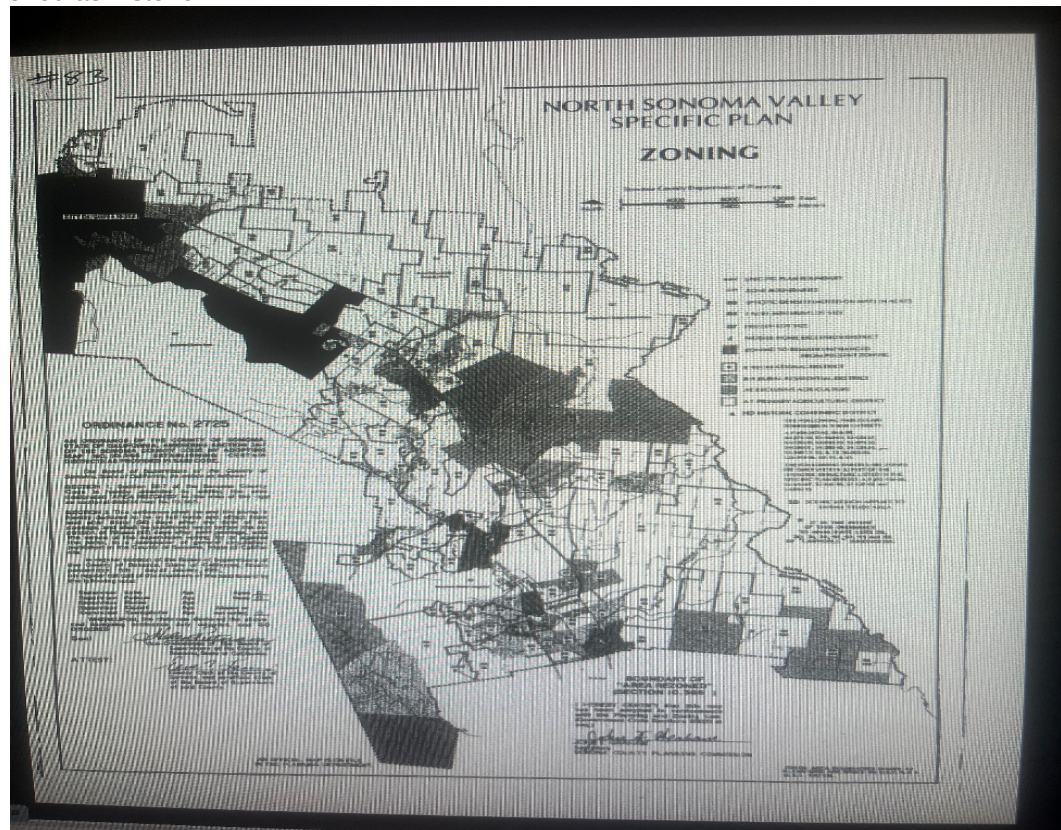
In 2009 Landscape Architect Janet Grackyk reported finding supporting historic significance and in 2014 teamed up with Diana Painter of Painter Preservation and Planning to do a field survey demonstrating eligibility for National Register.

In 2014 Charles Mikulik, Cultural Resources Compliance Specialist and Principal Archaeologist with the GEHS prepared a submission to the State Office Historic Preservation for National recognition for which SHPO agreed the property was eligible for National Recognition. It should be noted that the following documentation shows that this body is an authoritative guide:

**The California Register of Historical Resources (California Register) is an authoritative guide to California's significant historical and archeological resources to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state, and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.**

**(See California Public Resources Code §5024.1) The California Register program encourages public recognition and protection of resources of architectural, historical, archeological and cultural significance, identifies historical resources for state and local planning purposes, and defines threshold eligibility for state historic preservation grant funding.**

The following is a zoning map circa the late 1970's (based on the Board of Supervisors listed) indicating the property is zoned as historic:



During the years of 2017 and 2019 the State Office Historic Preservation shared correspondence with the Department of General Services and the Department of General Services indicating the property was eligible for national historic recognition but required further edits to the application. These correspondences were signed by Julie Palanco, State Historic Preservation Officer and have been submitted to Permit Sonoma previously however the dates of the letters for ease of reference are:

Date	Addressed to	Receiving State Department	From	Sending Department
June 28, 2017	Jennifer Parsons, Senior Environmental Planner	Department of General Services	Julianne Palanco, State Historic Preservation Officer	State Office of Historic Preservation
September 15, 2017	Jennifer Parsons, Senior Environmental Planner	Department of General Services	Julianne Palanco, State Historic Preservation Officer	State Historic Preservation Officer
July 22, 2019	John Doyle, Chief Deputy Director	Department of Developmental Services	Julianne Palanco, State Historic Preservation Officer	State Historic Preservation Officer

Rogal and Grupe, as developers, have elected to make their own evaluation of the 1897 Sonoma House with the following statement of February 15, 2025:

**“In the course of our detailed analysis and planning (sic) for the site, we have come to the conclusion that the restoration of the Sonoma House, which principally served as the private residence, for most of its occupation, for one of the nation’s leading hands-on practitioner of eugenics, is not an undertaking we support.”**

This was opinion, and not based on historical data of the structure, architecture or age but based on Rogal’s personal opinion on the past controversial eugenics program that was unfortunately acknowledged nationally. Sonoma House could be used as a museum to celebrate successes in treatment as well as those dark times that no one today celebrates. The structure was built in 1897 and is recognized as eligible for historic preservation.

In addition, Rogal writes about Sonoma House:

**‘....and not what it was during the darkest, long chapter of life at SDC, a place where a eugenic program was conceived, expanded and admired. ‘**

That statement is historically incorrect as eugenics was a national movement and NOT conceived at Sonoma Developmental Center. It should be noted that, at the time, these philosophies were advanced, and even admired, across the medical world and should not be attributed solely to the Eldridge property. Property preservation should be based on more than opinion of a land developer who prefers to eradicate the presence of an entire historic site rather than honor the 130 years of great work by generations of

health care professionals and family advocates working with, and caring for, people with developmental disabilities.

Wholesale demolition of historic resources is an irreparable path to take. It must be stopped. History cannot always speak for itself and it is up to present day preservationists to protect this story to honor the health care professionals, families and advocates that created this legacy.

Thank you for your consideration,

Teresa Murphy, VP

On behalf of the Glen Ellen Historical Society  
glenellencav@comcast.net