



PRESERVATION SACRAMENTO

(916) 202-4815 - PO Box 162140, Sacramento CA 95816 – preservation.sacramento@gmail.com - PreservationSacramento.org

Dear Stephanie Colman,

On behalf of Preservation Sacramento and its over three hundred members, I would like to thank you for the opportunity to comment on the proposed P Street Office Building Project. Preservation Sacramento is dedicated to protecting Sacramento's historic places and encouraging quality urban design through advocacy, outreach, and activism. Preservation Sacramento's Board of Directors includes cultural resource professionals, who meet the Secretary of the Interior Standards for History, Architectural History, and Archeology, as well as, concerned citizens from other disciplines and backgrounds (credentials available upon request).

The proposed project involves a request to demolish existing surface parking lot and replace it with a new office building or multiple buildings on the block bounded by P and 8th streets. A portion of the project site is occupied by the Heilbron House, which may be relocated or demolished as part of the proposed project. The project also may include ground-level retail, and offsite parking. The Heilbron House is listed on the National Register of Historic Places and on the California Register of Historical Resources for its architectural significance. In 1976, the Sacramento Old City Significant Structures Survey identified the resource as an Essential Structure, the highest significance criteria. The house was designed by prominent Sacramento architect, Nathaniel Dudley Goodell. Goodell has designed some of the most prominent buildings in Sacramento including the Governor's Mansion.

The Notice of Preparation (NOP) project description is inadequate and includes conflicting information. Without a complete project description it is very difficult for Preservation Sacramento to understand potential impacts to historical resources and provide useful comments. It is unclear if the proposal includes demolition or relocation of the Heilbron House. Moreover, the initial public scoping meeting, held on January 12, 2017, included a third option, not mentioned in the NOP, which proposed the building be preserved in place. Without a complete project description, Preservation Sacramento and other concerned citizens cannot participate effectively in the environmental review process. We recommend the Department of General Services schedule a series of public scoping meetings with the intent of refining the project can be defined to a point where potential impacts can be fully understood by the public and decision makers early in the environmental review process.

Relocation or demolition of the Heilbron House is a significant environmental impact pursuant to the California Environmental Quality Act Guidelines (§ 15064.5(b)). The project alternative presented at the scoping meeting which included preservation in place has will have the least impact to the historical resources and is Preservation Sacramento's preferred alternative. However, preservation in place is also likely to impact the Heilbron House, the severity of those impacts depend largely on the design of the new building and site plan. If preservation in place is selected as the preferred project, it is critical the new building respect the Heilbron's character defining features. This resource was one of the largest and most prominent buildings



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in Sacramento's west end and its landscape, massing, and ornate architectural details should be complemented by any new building. Ensuring continued public use and appreciation of the Heilbron House should be a priority of the site plan and design if preservation in place is selected by the project proponents.

Prior to selecting this alternative, it is imperative that the project proponents conduct a comprehensive feasibility study, which includes both structural and logistical analysis for relocation or preservation in place. Both relocation and demolition of the Heilbron House represent significant environmental impact and will require a range of mitigation measures beyond merely documenting the building. Preservation Sacramento recommends any significant impacts to historical resources be mitigated with measures that have a public benefit component. These might include, but are not limited to:

- Historical resources surveys or studies of the area or similar historical resources in the Sacramento region;
- Funding museum exhibits or documentaries which relate to the history of architecture, redevelopment, or other themes that will be forever lost through demolition or relocation of the Heilbron House; and
- Funding a series of walking tours of Sacramento's west-end to help residents and visitors understand the area's history that would be forever lost by demolition or relocation of the Heilbron House.

The Heilbron House is one of the last vestiges of a thriving residential neighborhood that extended from Capitol Avenue on the north to the Southside Park on the south. Beginning in the late 1950s this area was transformed by redevelopment projects like Capitol Towers (located west of the proposed project site) and construction of ever expanding state office buildings. Today, only three houses from the late 1800s remain: The Crocker House, The Leland Stanford Mansion, and the Heilbron House. These resources represent the last remaining examples of an important and irreplaceable piece of our history; examples of Sacramento's rise from a largely transient population in the 1850s to an established city and state capitol by the 1870s and into the 1880s. Demolition of this resource cannot be an option.

Sincerely,

Garret Root, President

Preservation Sacramento Board of Directors