

pbscommissions - Case#: MHRB_2020-0001 Dominy: Public Comment

From: Robert and/or Christina Aranguren <villageduo@gmail.com>
To: pbscommissions <pbscommissions@mendocinocounty.org>
Date: 7/16/2020 10:30 AM
Subject: Case#: MHRB_2020-0001 Dominy: Public Comment

Mendocino Historic Review Board
Department of Planning and Building Services
County of Mendocino
120 West Fir Street
Fort Bragg, CA. 95437

Mendocino County

JUL 16 2020

Planning & Building Services

Re: Case#: MHRB_2020-0001

July 16, 2020

Chair Lamb, Board Members Kappler and Roth;

Note: Due to the three-minute limit set by staff for the July 20, 2020 special meeting of the MHRB, I submit a portion of my comments at this time. The remainder of my comment will be presented orally during the meeting.

The comments below reflect concerns I share regarding the solar development under consideration at 44855 Pine Street, Mendocino, by Robert and Carol Dominy, of Fort Bragg.

1. First of all, dimensions for the solar panels under consideration are once again absent in the staff report despite a March 2, 2020 request that the plans be returned to the agent and resubmitted to PBS with the specific dimensions. At the March 2 meeting, it was also noted that a southern elevation was incomplete with the request for a more accurate rendering. Both requests have not been acknowledged. The rendering currently included in the staff report remains incomplete and illegible. I am requesting again that staff require a complete and clear rendering so the public will better know what can be expected, and the Board is able to make a more informed decision. I've also requested on two occasions that my March 2, 2020 public comment be placed into the administrative record, but they have not, contrary to PBS protocol that, "All public comment will be made immediately available to the Board, staff, and the general public as they are received and processed by staff, and can be viewed as attachments to" meeting agendas.

To that end, is staff able to confirm that *all letters and comments* involving the history of this project been made available and accessible to the public to date?

2. Contrary to PBS opinion, this project does not at all satisfy the solar guidelines published in Chapter 14, "Solar Technology" of the Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings passed by this Board in 2015, which recommend:

~ that any solar installation not solely benefit the building while at the same time compromise the character of the site or negatively impact the surrounding historic district (p. 14). This project will be able to be viewed from four private properties, a number of public facilities, and several public roads, many of which are designated as historic;

~ that any solar installation not be visible or only minimally visible from the public right of way (p. 15). This project will be able to be viewed from the Community Center and grounds, the Evergreen Cemetery, several public roads, and will not be limited by other structures as it has been suggested by staff. In addition, we suspect that the backyard bramble along the southern property line has been allowed to burgeon so the claim could be made that the panels would be out of public view. The backyard overgrowth is now encroaching cemetery grounds, covering historic headstones. This strategy is neither straightforward nor site sensitive.

3. The 1992 Town Plan records, "Rarely does a community invest as many hours in a plan as have the residents of Mendocino". The project before you does not satisfy a number of plan requirements, which:

~ defines the Board's purpose, "to ensure preservation of the architecture and design character of the Town";

~ to discourage incompatibility;

~ that any design considerations for alternative energy sources remain important due to the emphasis on historic preservation; and,

~ the retention of public views.

In addition, Town regulation Section 20.760.050 mandates that, "Size, forms, materials, textures, and colors shall be in accordance with the appearance of structures built in Mendocino prior to 1900". Our regulations stress no adverse effects to nearby historic structures, the compatibility of adjacent building materials and colors, and discourage the excessive use of glass. In this case, reflective, black glass: four, approximately 25 foot long rows of television sets approximately 30 inches high ~ turned perpetually off.

California's newly updated Solar Permitting Guide, largely developed by the Governor's Office, generally considers stand-alone, ground mounted solar structures as "equipment". The Town regulation on this point is clear: Section 20.760.045 expressly prohibits mechanical equipment left uncovered and visible within the Historic District.

4. Greenwashing this project does not assist. The toxicity of solar collectors is well documented. Environmental scientists and solar industry leaders have been raising the alarm about toxic pollutants including lead, cadmium, and other carcinogenic chemicals in panels that "can be almost

completely washed out of the fragment of solar modules over a period of just several months, for example by rainwater" or seismic, climatic, or meteorological damages (University of Stuttgart Institute for Photovoltaics; May, 2018). The lifespan of a panel averages is about twenty years before it becomes solar waste and is shortened in marine and coastal environments. Given the fact that Mendocino is reliant upon wells, some of which are extremely shallow, the long term degradation of local groundwater quality and public health and safety consequences must be considered.

5. The project does not satisfy the requirements of the California Coastal Act, which:

~ designates Mendocino as a "Special Community" pursuant to Section 30253(e), that any new development minimize the adverse impacts created by them and protect special communities and their neighborhoods that, because of their unique characteristics, are popular destination points for recreational uses. It is protections like these which continue to contribute to our quality of life and our economy.

6. When the Mendocino and Headlands Historic District was added to the National Register of Historic Places in 1971, it met specific criteria. At the time, it was determined that Mendocino possessed a place of significance in American history, architecture, and culture present in its sites, structures, buildings, and objects, with an integrity of location, design, setting, materials, workmanship, association, and feeling. Integrity is the ability of a property (a district, a community) to convey its significance. As such, contributing properties must retain their integrity. They either do or they do not. This brings up two critical issues:

~ whether the Historic District would have met National Register criteria if rooftop and especially, ground-mounted solar energy systems had occupied the town; and,

~ whether Mendocino will continue to meet their criteria if projects like this are approved.

Properties that cease to meet criteria for listing because the qualities which caused them to be originally listed are lost or destroyed can be grounds for removal. This project has the potential to establish critical precedence for the community. Given the fragility of historic resources, I urge caution. There are plenty of properties within the District with sunny, suitable southern exposures, and there is concern that the applicant is the Vice President of the Kelley House Museum, whose mission it is "to collect, preserve, and protect...the rich history of the Mendocino coast". This has left many residents wondering, what's next: solar arrays on the Kelley House lawn?

This concludes my comments at this time. I thank the Board for their generous time and careful attention to this matter.

Christina Aranguren
Mendocino

