

James Feenan - Fwd: MHRB 2020-0001 Dominy

From: James Feenan
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Subject: Fwd: MHRB 2020-0001 Dominy

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>>> lee edmundson <lee@mcn.org> 7/17/2020 7:15 PM >>>
Dear All,

I have attached a draft paper I was preparing for MHRB's consideration as an extension of my comments regarding this MHRB application. Please forward this to MHRB member Kappler, whose email address I do not have.

I'll be brief: I have difficulty fathoming why anyone would purchase property in a Historic District as unique as the Town of Mendocino and then propose a project so grotesquely out of character with its historic distinction.

Granted, the California Solar Rights Act prohibits this -- or any and all -- jurisdictions from prohibiting the installation of solar devices. This to me represents a legislative mistake -- a 'one-size-fits-all' approach that jeopardizes the integrity of the Historic District. Perhaps eventually the California legislature will recognize its error and amend the law exempting historic districts and buildings from this onerous mistake, but for today, here we are.

I see little to be gained from this application for solar devices. No

energy inventory has been conducted for the structure. The proposed array is sited and situated to guarantee inefficiency (we should note that solar arrays are most efficient when installed facing south (the array proposed for the roof of the shed face east and west), and the ground installation doesn't appear aligned for maximum southern exposure.

Nevertheless, MHRB cannot deny applicant their folly. But can -- and should -- do all it can to mitigate its adverse aesthetic effects upon the character of the setting and surroundings.

The solar units should be masked from view as much as possible. The frames should be (what we call in theatre design) Flat Black, not shiny.

To the greatest extent possible, the guidelines I've provided in my attachment should adhered to.

I want to take this opportunity to ask the Applicant two simple questions: Is this Solar Panel application really necessary? What is to be truly gained?

I thank you Staff and MHRB Members for your time, effort and attention.

Wear a Mask, Wash your Hands. Stay Healthy.

Regards,

Lee Edmundson, Mendocino

SOLAR PANELS WITHIN THE HISTORIC DISTRICT A OF THE TOWN OF MENDOCINO

1) The Mendocino Historic Review Board Design Guidelines of 1987 is clear as a bell; Page 12: “SOLAR ENERGY AND WIND DEVICES, “Where solar energy is to be used as a primary or supplementary source of heat or other energy, solar collection devices **should be** located on the rear or other non-public sides of the building, or on roof surfaces which are not visible from adjacent streets or other public areas of town. Solar collection devices which are not attached which are not attached to the building **should be** located **only** in the side or rear yards”. (Emphasis Added).

It should be noted this guideline is prescient, adopted long before photovoltaic panels became viable; this guideline was adopted to apply to solar panels that heated hot water. Parenthetically it should also be noted the 1987 Guidelines also suggest satellite dishes to be placed out of view from public thoroughfares.

2) The Secretary of the Interior’s Standards for Rehabilitation (2011) brings in a National Standard for Solar Technology in Historic Districts. Their office recommends, on Page 15, “Installing a low-profile solar device on the historic building **so that it is not visible or only minimally visible from the public right of way... out of view from the public right of way..**” Their office **does not recommend**, “Installing a solar device in a prominent location on the building where it will negatively impact (the buildings) historic character”. (Emphasis Added).

3) The 2011 Technical Report on Implementing Solar PV (photovoltaic) Projects on Historic Buildings and in Historic Districts by The National Renewable Energy Laboratory (NREL), which is under the auspices of the U.S. Department of Energy, directs (Page 20): 1) Locate solar panels on the site of historic resource. **If possible, use a ground-mounted solar panel array.** Consider solutions that respect the building’s historic setting, **locating the solar arrays in an inconspicuous location, such as a rear or side yard, low to the ground and sensitively screened to further limit visibility.**4) **Place solar panels in areas that**

minimize their visibility from public thoroughfare... (Emphasis Added).

There are several other recommended conditions contained therein, these are the most pertinent.

4) The City of Santa Monica - Solar Panels on Designated Landmarks and Historic District Properties states: Recommended: **1) Add solar panels on roof surface not visible from public way.**

The unanimous — consensus — recommendation from these various pertinent authorities is, simply that: solar panels should not be visible from public thoroughfares. These recommendations pertain not only to historic buildings and/or districts, but especially to the Town of Mendocino, which is a state and nationally designated Historic District.

This standard should be incorporated into both the Mendocino Town Plan and its Zoning Code.