



CALIFORNIA CAPITOL HISTORIC PRESERVATION SOCIETY

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April 10, 2020

Ms. Stephanie Coleman
Senior Environmental Planner
California Department of General Services
707 Third Street, MS-509
West Sacramento, CA 95605

RE: Capitol Annex Project Draft and Recirculated EIR (SCH No. 2019049066)

Dear Ms. Coleman:

The California Capitol Historic Preservation Society hereby submits comments on the project draft listed above. The Society is the official non-profit support group founded in 1984 with its primary purposes of assisting in the preservation and enhancement of the historic and museum character of the California State Capitol complex for the benefit of the people of California. In part, the Society's mission is to support and assist the Historic State Capitol Commission and the Legislature relevant to the Capitol complex, which includes the Capitol Mall and Capitol Park.

In this regard, the above-referenced proposal to renovate the East Annex should be done in a manner that minimizes the potential impacts to the entire Capitol complex. Unfortunately, the EIR fails to properly describe the project's three major components: the construction of a new Visitor's Center; the demolition and reconstruction of the annex; and the construction of an expanded underground parking structure. This lack of information prevents any honest and serious analysis of the environmental outcome of the total project's impact. Those impacts should not be overlooked nor missed but be identified and analyzed so that the Legislature and public understand what they are and how they can be mitigated under the EIR.

The EIR does acknowledge the historic significance of the historic Capitol, which is listed in the National Register of Historic Places. Thus the significance of that listing requires that an EIR shall include an analysis consistent with the federal Secretary of Interior's Standards (SOIS). Under these guidelines, the California Department of General Services (DGS) may not postpone an analysis to a later date; a comprehensive analysis *must* be part of the original EIR.

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In that regard, the above-referenced EIR must be rewritten to address the requisite detailed complete description for each cited component -- the construction of a new visitor's center; the demolition and description of the Capitol East Annex; and the construction of an expanded underground parking structure -- with recommended, workable alternatives to reduce possible impacts to the Historic Capitol Complex, including east Capitol Park.

Attached is the April 11, 2019 memorandum that the California Capitol Historical Preservation Society sent the Joint Rules Committee of the California Legislature and to the Historic State Capitol Commission, informing them of the requirements to follow the Secretary of Interior's Standards as they relate to the Capitol Annex.

We look forward to hearing from you regarding the above-mentioned concerns and requirements.

Respectfully submitted,



DAN VISNICH

Executive Secretary

cc: Governor Gavin Newsom
Assemblyman Ken Cooley, Chair, JRC
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