

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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May 14, 2009

Ellie Buford, Manager
Environmental Planning Services
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Dear Ms. Buford:

Re: Environmental Assessment for the Sacramento Intermodal Transportation Facility

Thank you for the opportunity to review the referenced Environmental Assessment. This office does not ordinarily comment on NEPA documents, preferring to provide our comments through the Section 106 process. This case is unusual, however, in that it is a three-phase undertaking, with minimal impacts to historic properties in the initial phases and the potential for huge and adverse effects in the third phase. Section 106 consultation is underway on a tiered Programmatic Agreement which will deal chiefly with known impacts from Phases 1 and 2, and an agreement to consult further when funding is made available for Phase 3.

The city, I suspect, will begin planning for the third phase, even in the absence of funding. That being the case, I think it prudent for me to offer my comments on the two alternatives for Phase 3: leaving the depot in place, or moving the depot to a location near the relocated tracks. I can state unequivocally that Alternative 1 is far preferable to Alternative 2 in terms of its impacts to historic properties.

From the historic preservation perspective, it is always preferable to leave a historic property in place, and that is especially true in this instance. The setting for the depot will be altered in either alternative through relocation of tracks and construction of new buildings to accommodate the intermodal facility. The question is which alternative does the lesser damage to the building and its context.

It is shortsighted to think of the context of the depot, only in relation to the railroad tracks. The depot has for many years anchored I Street. It and the companion REA building are at least as important to the streetscape as they are to the trackscape. To move the depot while leaving behind the REA building would destroy all of that historic relationship to I Street. New intermodal construction would also render the depot essentially invisible to the street.

It is also erroneous to presume the relocation of the depot could be accomplished without major damage to historic fabric of the building. Most obviously, the relocated building would leave behind the basement, a major part of the square footage of the

structure. It is also highly probable that the relocation effort would result in major damage to the walls, the roof, and the remainder of the building, as it would surely be moved in pieces and reassembled at the new site.

It is also likely that the "relocation option" will cost millions more than the "preserve in place option." My reading of your document tells me that preliminary estimates show a \$10 million difference between the two options, a figure that may be too conservative. That \$10 million could far more fruitfully be applied to the rehabilitation of this wonderful building, which has been neglected for so many decades.

Again, this office rarely comments on NEPA documents, preferring to make our comments through the Section 106 process. This case is unusual because the highest order impacts could occur in Phase 3, which may not be implemented for many years. That being the case, I thought it prudent to let you know now what my opinion is regarding the impacts of the two Phase 3 alternatives, recognizing that you may begin planning this phase long before funding has been secured.

Thank you again for soliciting my comments on this major undertaking.

Sincerely,

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer