

#36 State Parks concurs that the Historic District should offer a “Spirit of Place” that allows separation from the nearby urban area. Please also see response # 34.

#37 While State Parks agrees with the “Friends” regarding the “Spirit of Place” for the Historic District, we disagree that reducing intensity in the hollow area is the best way to achieve that goal. The hollow area is central to the Historic District and a natural gathering point. It also provides the best opportunities to allow ADA accessibility to the site while minimizing impacts to the historic fabric. Solitude would be found at the fringes. In order to promote a pedestrian friendly environment, vehicles except for small shuttles (golf cart type) will be discouraged from traversing the central areas of the Historic District. No large delivery or service vehicles will be allowed between the hours of 10 AM and 4 PM. An aquatics program and the Historic District cannot be separated because it is part of the Historic District identity and the water must be accessible to the program. The aquatic program allows the public an exceptional opportunity to interpret the aquatic resources and to protect both the public and the resources during recreational activities.



FRIENDS OF THE IRVINE COAST
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December 2, 2002

Tina Robinson, Associate
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, California 92108

Subject: Crystal Cove Historic District Preservation and Public Use Plan and Draft EIR

Dear Ms. Robinson:

The Friends of the Irvine Coast (now called Newport Coast) have reviewed the Crystal Cove Historic District Preservation and Public Use Plan and Draft EIR and have some concerns about the document. Over the past 25 years the Friends have been successful at preserving open space and wildlife habitat on over 77% of the 9,500 acres of Newport Coast lands. We have been an active participant in the public workshops held over the past few years for the planning of future uses in Crystal Cove State Park. We are very interested in seeing the historic district open for public use and affordable overnight accommodations.

36 [We wholeheartedly agree that the focus of the Preservation and Public Use Plan (PPUP) for the Crystal Cove Historic District should be to preserve the historic elements of the district, provide for public use and enjoyment of the district and maintain the "spirit of place" atmosphere that originally attracted people to Crystal Cove. The PPUP acknowledges that the district has an atmosphere of being a refuge from the pressures of modern life, either for the 1930's or the present time. The focus of the PPUP should be to preserve the solitude and pedestrian character of the area to ensure that all reuse and new uses are compatible with this primary goal.

37 [The historic district has a rustic coastal community theme that could easily be destroyed by introducing all of the classrooms, exhibit halls, visitor centers, interpretive programs, research centers and lifeguard training facilities currently outlined in the preliminary PPUP for the district. Some of these activities should be

#38 In recognition of the park's importance as a large natural coastal open space area in Southern California, the original 1982 General Plan proposed park development (including coastal park facilities) to be located in areas that were already developed or impacted by past activities. Current proposals for the Crystal Cove Historic District as well as the El Morro area remain consistent with the original General Plan concepts for the park. Each of these park development areas has been planned carefully for its most appropriate and efficient use so that most of the park could be preserved as natural open space. During the course of the PPUP planning, there was an opportunity to appropriately provide for programs that serve not only the Historic District but also the rest of the park (such facilities for underwater park interpretation).

State Parks believes that the proposed PPUP adaptive uses are appropriate and should not adversely impact Crystal Cove's resources or visitor experience quality. Phased implementation will allow the Department to monitor and adjust programs, facilities, and activities to minimize resource impacts. This has the added benefit of minimizing encroachment on existing park facilities and avoiding potential development of additional areas in the park. Different interpretive programs are appropriate for different portions of the park. Since the Historic District is an existing developed area, it will provide educational opportunities to the public (in park locations that effectively serve educational purposes) and are available in the immediate future. State Parks will also utilize the facilities available elsewhere in the park including Park Headquarters, Los Trancos, and, in the future, the El Morro Day Use facilities.

37 located in the Los Trancos facility and certainly not centered within the Hollow. The Hollow is the first glimpse of the Crystal Cove community that a majority of people will see when arriving to the district from the pedestrian tunnel under PCH. This is the gateway to the past and will set the tone for their experience. While setting up an aquatics study center is a useful activity in the State Park, the historic district is not the appropriate location. It is not a historic use of the site nor will it reinforce the spirit of place that is the primary goal of the PPUP. This and other active uses included in the preliminary PPUP should be sited in other areas of the park so that the solitude and pedestrian character of the historic Crystal Cove community is in fact preserved. The level of activity associated with the reuse of the structures in the preliminary PPUP will generate too much congestion and traffic.

38 Attached is our list of concerns with both the preliminary PPUP and the draft EIR prepared for the PPUP. We are committed to see the successful transition of the Crystal Cove Historic District into the gem of the Crystal Cove State Park that will remain a refuge from the pressures of modern life for future generations. We have the opportunity to create a valued treasure for others to enjoy and cherish. While there are many competing interests for the use of this historic district, the adopted General Plan for Crystal Cove State Park aptly identifies the purpose of the park as follows. *"To make available to the people for their enjoyment the natural, cultural and recreational values of a significant open space area on the Orange County coast."* The State is charged with the task of managing, protecting and restoring the natural and cultural resources for future generations to enjoy. Crystal Cove is a very large park and the historic district is only a small portion of the park. It is not necessary or desirable for all of the facilities and services needed by the State to properly manage, protect and interpret all of the natural and cultural resources for the entire park to be centered within the historic district. This has the potential of destroying the cultural resource (the Crystal Cove structures and community) that it is trying to preserve.

Thank you for providing us with this opportunity to review the reports and to identify issues and concerns. Should you need any clarification of our comments, please do not hesitate to contact me. We look forward to your responses and the upcoming public hearings before the State Parks Commission and the Coastal Commission. Please include us on all of the mailings and notices for these meetings.

Sincerely,

Fern Pirkle 

Fern Pirkle, President
Friends of the Irvine Coast

#39 Please see responses # 6, 24, 27, 29 & 30. The suggestions in the *PPUP* for how each cottage may be used are intended to be flexible over time. Primary visitation activity and traffic in the Hollow or the core access road is anticipated to be related to day use access to Crystal Cove Beach (see Chart C: Estimates of Instantaneous Occupancy by Program, page 85), not adaptive cottage use. If public access from Los Trancos to the beach is to be maintained, continuing the use of the beach road as the access path is essential to effective circulation, accessibility, and assuring the overnight cottages will be in quieter more private areas of Crystal Cove. This type of accessibility is also one of many reasons for establishing the Village Center site concept with its visitor serving day use adaptive uses along the core access road axis.

ISSUES & CONCERNS WITH THE PPUP AND DRAFT EIR

The adopted 1982 General Plan states the goal of full public use of the historic district for its cultural resource to convey a spirit of place. This goal is not being met by converting only 31 of the 50 structures within the district for overnight accommodations. We believe that almost all of the structures should be made available to the public for reuse, with 80% of the cottages offered to the public for overnight rental use. This was originally anticipated in the 1982 General Plan and is consistent with the purpose statement for Crystal Cove State Park. The historic district was not originally built as a research center or a community classroom facility, it was a residential community with a small-scale store. The reuse of the cottages for overnight accommodations will more closely create the historic community and maintain the solitude and pedestrian character of the area. By establishing park operations or classrooms and interpretive centers within the district, the spirit of place may be lost. The EIR does not adequately address this land use issue and consistency with the adopted 1982 General Plan.

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There is a deep conflict in providing a quiet, secluded experience of a simpler time (page 50) and creating busy classes, exhibits, activities and programs "with visitors interacting with community facilitators" (page 77 and 65) which have nothing to do with the history of Crystal Cove. In addition, statements such as "The new public use Crystal Cove Community will be founded on the values that originally drew people to this beach in the 1920's and 1930's....." (page 76) do not provide real expectations for the future of the historic district. A public use community in the historic district is not full of classrooms and activities but rather has a residential character, that is available to the public for overnight stays. We do not want to create a new Crystal Cove community but preserve the cultural resource that exists.

We believe that the number of cottages designated for use by the park staff for operations and living quarters should be reduced to 1 or 2, with the remaining cottages converted to overnight rental units available to the public. We also believe that if the CARE activities were moved out of the Hollow area of the historic district to the periphery it would reduce the activity levels in this area, and thereby contribute to the tranquil atmosphere that is desired for the district.

The Core Access Road through the Hollow is just what its name indicates - the Core Road. The preliminary PPUP proposes that all traffic, shuttles, rangers, lifeguards, maintenance staff, staff residents, administrators, researchers, delivery and guest interpreters for the CARE Program must drive in and out on this road. In addition, all beach visitors must walk from Los Trancos parking area to the beach on the Core Road. With all of these activities occurring on or along the edge of the Core Road through the Hollow, it is difficult to see how "a quiet retreat" can be maintained. The PPUP must provide for reuse of the cottages in a manner that reduces activities in the Hollow since this is the gateway to a place of refuge. The Draft EIR does not address the potential traffic impacts of all of these uses on the intended quiet retreat. If there

#40 Crystal Cove State Park is the largest and most sensitive of the state parks located within Orange County. Park operations management considers the location of the resource ecologist and other key park staff when analyzing travel costs, personnel resources, work assignments, natural resource needs and public services. Park management will place their staff where they are most needed.

#41 Please see responses # 37 & 39. Additionally, due to the nature of the cottage setup in the hollow area, there will be a lack of privacy. If the CARE program outgrows the hollow area, then portions of the program may need to locate in the Los Trancos facility or a future study may determine if additional space is needed at Los Trancos. Such a determination would not be made until after implementation of the CARE program and a need is established. Part of the reason for locating these facilities in CCHD is also to make interpretive staff and CARE volunteers more available to serve the visiting public and certain resource protection surveillance benefits.

will be no vehicular access to the care programs, even drop-offs or electric carts, then the mitigation measures need to clearly identify these restrictions.

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If Cottages 14, 21 and 32 were not used for park staff housing, if Cottage 22 is not used for a lifeguard substation, if Cottage 13 is not used for a research station and all of these cottages are then used for overnight rentals, the traffic on the south beach road would be greatly reduced. Traffic on this road could be reduced to just the trips required for maintenance and shuttle service. This road could be used primarily for pedestrian access to cottages and the beach. The entire south end could become a quiet area.

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Move the Offices of the Resource Ecologist and the State Park Superintendent out of the Los Trancos Facility. The job descriptions for the Resource Ecologist and for State Park Superintendent are more encompassing than just the Crystal Cove State Park or the historic district. These positions include the oversight of State Parks throughout the county. Therefore, since Crystal Cove is a unique state park with the need for preserving cultural and natural resources, these offices do not need to be closely associated with the historic district. The proposed office space should be used for activities tied specifically to the historic district. Competition for space and use of facilities is clearly demonstrated in this situation. Is this an essential location for an ecologist and superintendent? Office space at the El Morro Headquarters or some other location in the county could be used for these positions.

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Keep the use of cottages 34 and 43 for multi-use, but change cottages 42 and 44 from multi-use to overnight rentals. The functions originally planned for 42 and 44 could then be shifted to the Los Trancos facility and/or to the office/docent facility. a majority of the CARE Program should be moved from the central part of the district to the Los Trancos facility in order to reduce the impact groups will have on the "quiet sense of retreat" that is sought for the Historic District.

The CARE and Educational Programs appear to be located in cottages 34, 42 43, 44, some parts of the cottage labeled 00 or Office and the Museum building on the beach. This would include 6 facilities in the CARE/Educational Programs. It is not necessary for the CARE uses to be in the middle of the historic district. The CARE programs should be moved to the peripheral areas of the historic district: the bluff, Los Trancos and the beach. The Office, cottage 43 and the surrounding outside areas would still provide space for some CARE activities. This would reduce the amount of group activities within the Hollow and help reduce congestion. Most of the CARE program activities are planned for sites within the Hollow and along the primary CCHD Core Access Road. This will focus several group activities in the Hollow. The PPUP suggests that the "Office" be used as a visitor center, a place where docents can start tours and a location for small group meetings. Cottages 42, 43 and 44 are to be used as multi-purpose and educational centers. The old "Store" is to be used as a museum and for exhibits. These activities alone would cause the Hollow to be congested. Cottage 5 is the designated point where Maintenance will have various crews meet

#42 State Parks respectfully disagrees. Ocean recreation is a year round activity at Crystal Cove State Park Historic District. The increase of visitation anticipated in the implementation of the *PPUP* will require the aquatic staff at Crystal Cove State Park to have a significant presence within the Historic District. The Lifeguard Substation planned for cottage 22 will provide the necessary support for lifeguard staff that will be present to meet this increase in ocean recreation. Additionally, the lifeguard staff at Crystal Cove State Park is fully engaged in the protection and public education of the tidal and inter-tidal zones offshore of Crystal Cove Historic District. The Lifeguard Substation will also support these important resource management and interpretive efforts. Crystal Cove is geographically isolated from other areas and vehicles cannot traverse the between areas during high tide. A vehicle would be kept on the beach for quick response through radio contact.

(p.110-111) and that will bring more people into the Hollow. Cottage 15, at the base of the Hollow, is to be a café, which will serve breakfast, lunch and dinner.

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Move the research cottage from 13 to 45. Although it is quaint to have a cottage located on the sand appointed as the Research Station, this site is not appropriate or historically part of the Crystal Cove community. Cottage 13 is at the end of the road and no parking space is allocated for this area. Therefore every time the researchers need equipment it will require two trips through the middle of the district, once to bring the equipment in and once to take it out. Thus vehicle traffic will increase. If the research station were moved to cottage 45 or another location within the park there would be no need to drive through the cottage area on a consistent basis and the researcher could have access to the garage storage area. The Research Station would be in a more secure area than it would on the perimeter of the district. If large equipment were needed this cottage would have good access from PCH.

We believe that the cottages are not the ideal location for observing dolphin movement. Good optical equipment and a position high on the bluffs would be a better position to observe the dolphins that visit Crystal Cove waters.

No lifeguard substation should be located in the historic district. A first aid station should be located somewhere, but a full cottage (22) should not be used as a substation. This was not historically part of the community and the level of activity associated with a lifeguard station is inconsistent with the spirit of place desired for the historic district. Lifeguards will cause multiple vehicle trips through the cottage area daily. The road that leads to the lifeguard substation is designated to be a secondary, single lane road. It is a bad idea to station an emergency vehicle in this situation. Pedestrian traffic could either inhibit emergency vehicle passage or be endangered by fast moving vehicles. Blowing a siren in the Historic District will not generate the kind of relaxing atmosphere that is desired.

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A beach with only three miles of coastline should not need the three radio stations that are now planned for Park Headquarters, El Morro Beach and CCHD. The new, modern properly designed lifeguard station that will be built at El Morro Beach should meet every demand for proper operations and communications within the Park. By the time the Park is developed there should not be a need to provide a specific cottage used for lifeguard training in the district. The lifeguards will have access to the Park Headquarters behind El Morro School, the Los Trancos facility, the Beach Headquarters at El Morro and multi-use cottages such as # 34 and the Visitor Center. There will be several outdoor meeting places within the Park that can be used for small group training sessions when the weather is good.

Using Cottage 22 for a satellite lifeguard station is not necessary. The guarding of Crystal Cove beaches is done from mobile units (vehicles) and manned lifeguard towers. Cottage 22 should not be used as a beach observation platform. Cottage 22 is located so the beaches to the south of this location cannot be observed adequately. Also, it is located far enough away from the central and north end of CCHD that it is

#43 State Parks intends to keep the rates low. The AAA standards or a percentage of local rates was identified as a way of determining a common index or standard. It is the intent of State Parks to utilize the revenues generated by overnight accommodations for the continuous historic restoration/maintenance that the Historic District will require, possibly through the use of a non-profit organization. Such maintenance and restoration would be more costly than the cost of taxes borne by private hotels.

#44 Please see Sections 4.2.1 and 7.1.1 and response # 3. The Historic Landscape Management Plan will determine all appropriate landscape elements and subsequent treatments within the Historic District. Outside of the Historic District, appropriate coastal native plants will be planted in accordance with HCCP standards and fire management goals. It is not likely that such landscaping elements would impact views from the cottages or highway but they may not provide optimum visual screening.

not practical to expect a guard manning an observation platform to be able to make quick surf rescues. Any rescues from this location would have to be assisted by a mobile unit with a siren. This vehicle would have to travel through the southern cottage area with its siren on before it could gain beach access, near Cottage 1.

42 For normal operations, the CCHD should continue to be staffed by individual guards in towers and supported by mobile units, which can gain access to the beach north of the district. The lifeguards should attempt to pass through the historic district as little as possible. Direct passage through the district could be disruptive to the quite character of the community and should be limited as much as possible to only emergency or training operations.

43 The PPUP suggests that the rate charged for overnight accommodations should be tied to AAA standards or a percentage of local rates. The Park does not have to pay taxes or compete with private hotels. The rates charged by the Parks should be far below the prices of hotels in either Newport or Laguna Beach. The purpose of providing the rental units should be to offer a unique opportunity to the visitors of the CCHD area. Keep the rental rates low and encourage everyone to visit the park for an overnight stay.

44 Landscaping will strengthen the character of the area and maintain the historic ocean views from PCH across the district. The mitigation measures should include specific language to regulate the type of plants permitted into the area so that the ocean views are preserved from the cottages and from the highway, to provide visual screening to protect cottages 33 to 34 from Newport Coast development sites and Coast Highway, and to protect the view through the Hollow. In addition, the mitigation measures should include provisions for the landscape design to preserve the views of Cottages 33 to 15 from PCH.

Traffic

45 There are many references to keeping vehicles out the CCHD in order to reduce traffic, to stress pedestrian activities and allow the potential use of shuttles. The PPUP stresses keeping a rustic atmosphere, not widening or improving road structure. The effect of the Preliminary PPUP will create the need for vehicles to pass through the middle of the historic district. There will be the following number of vehicles in the district, yet the draft EIR does not quantify the trips. Lifeguards – 4 vehicles; Rangers - 4 vehicles; Maintenance (landscape, laundry, cottage cleaning) – unknown number of vehicles; Trash pickup (cottages, beach, concessions) – unknown number of vehicles; Food services (multiple delivery trips per day) – unknown number of vehicles; deliveries and drop-off (Research Station, Office/Docent area, Education areas, Museum) – unknown number of vehicles; and, Family members of permanent park staff living in cottages – unknown number of vehicles.

What will be the actual volume of traffic within the CCHD? How many vehicles will be parked within the historic district? How many vehicles will come and go on a daily basis, during peak hours for both summer and winter? What would the traffic look like

45 Trash removal will be located at the new parking lot and delivery trucks will be limited to off-peak hours. Please see response # 13. At least 10 to 15 vehicles will be able to stack on the entrance road before the kiosk and an additional 5 to 10 vehicles on PCH in the right turn pocket. Signing will be provided to direct traffic to Los Trancos. Minor widening will be required to provide emergency vehicle access (fire) and accommodate traffic to enter the Historic District at the kiosk.

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if the maximum number of vehicles allowed access all showed up at the same time? Is space for 10 cars leading to the kiosk enough to keep cars from backing up on PCH during peak use periods? Is there enough room to get a shuttle from the Los Trances parking lot past the cars lined up at the kiosk? Will the kiosk and lined-up cars interfere with emergency vehicle ingress and egress from the historic district area? How will emergency vehicles gain access to the proposed lifeguard headquarters? How will handicapped individuals secure direct access to the beach at the bottom of the Hollow? This is the only possible access point within the entire park since the plans for El Morro Beach does not provide for direct ADA beach access.

46 The adaptive use plan for Cottage #15 can accommodate the use but Cottage #5 cannot due to lower ceilings. The outdoor area at Cottage #5 could be utilized by the public.

December 1, 2002

Ms. Tina Robinson
California Department of Parks & Recreation
8885 Rio San Diego Dr., Suite 270
San Diego, CA 92108

RE: Crystal Cove Historic District Preliminary Preservation and Public Use Plan

Dear Ms. Robinson,

On behalf of Laura Davick and the Alliance to Rescue Crystal Cove and Joan Irvine Smith and the Crystal Cove Conservancy, we submit to you the following comments related to the Crystal Cove Historic District Preliminary Preservation and Public Use Plan.

- 46
- I. Cottage Café/Snack Bar – The proposed plan has identified Cottage #15 for this purpose. Cottage #15 is not large enough to accommodate a full kitchen for preparation of breakfast, lunch and dinner for the estimated 210 people that will be staying in the cottages designated for overnight use. We feel that Cottage #5 would be better suited for this use for the following reasons:
 - A. Cottage #15 is not large enough to accommodate the needs of full kitchen preparation for breakfast, lunch and dinner. With up to 31 cottages being allocated for individual style accommodations and up to 4 cottages for dormitory style accommodations, food service is going to be an important use. If the above estimated 35 units have 6 people each per night (210 people) multiplied by three meals per day, that equates to 630 meals per day. This estimated figure of 630 meals per day does not even include any of the day use visitors. There will need to be an area large enough to accommodate these needs without impacting the existing ambience of the central and beachfront area of the Historic District.
 - B. I spoke with the manager at Coco's Restaurant in Corona Del Mar to see approximately how many meals they served per day. I was told that they serve approximately 600 meals per day. This provides for a comparison of building size that could potentially be needed.
 - C. By placing the Cottage Café in Cottage #5 instead of #15, this would minimize the impact on the coastal view shed. People will be "lined up" waiting to eat here. Let's not make the Cottage Café the focal point of the Historic District and ruin the quiet serenity that now exists when you first reach the beach.

#47 The garage at Cottage #5 will be retrofitted as a public restroom. At full implementation, visitors would have both the cottage #5 garage-restroom and the Los Trancos restroom to serve their needs upon arrival or departure. For beach visitors there are other proposed restroom facilities also.

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- D. **Delivery trucks will need easy access to make deliveries to the proposed Cottage Café. With the existing proposed location for the Cottage Café at Cottage #15, delivery trucks would need to drive into the hollow of the Historic District. Deliveries will be much more practical at the rear entrance to Cottage #5.**
- E. **Trash storage, trash cans and pick up can also be accommodated at the rear of Cottage #5 as opposed to being in the center of the Historic District at Cottage #15.**
- F. **Cottage #5 has a very large back yard that could easily accommodate numerous tables with umbrellas on various terraced levels. It is a beautiful natural setting to enjoy breakfast, lunch or a light dinner.**
- G. **Remove the "Beach Store Concession" component from the Cottage Café and place that in Cottage #46 which has been the original store location for the Historic District since the early 1920's. (see Beach Store Concession for more details on this use). There is simply not enough room at Cottage #15 to accommodate both of these uses here.**
- H. **The current proposed use for Cottage #5 is for park operations and maintenance office. We recommend that only one cottage be used for park operations and maintenance. (Please see park operations and maintenance below for comments related to this change).**

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- II. **Public Restroom Facilities – It has been my experience that when people first arrive at the Historic District, the first thing they look for are restrooms. We recommend that a new structure be built and tucked away behind Cottage #5, at the rear of the hollow for the following reasons:**
 - A. **This will provide a centralized restroom facility that all park visitors will pass by on their way into the Historic District.**
 - B. **This structure could have the exterior appearance of a small historic cottage. This has been done quite successfully at the Sea and Sage Audobon House.**
 - C. **This would reduce the number of restrooms needed that are now proposed to be housed underneath the overnight cottage rentals. It seems inappropriate to place restrooms below the cottages that are designated for overnight visitors.**
 - D. **Another alternative might be to convert two of the first garages at the entrance for public restrooms. During a recent tour of San Clemente State Park, it was interesting to see that their historic garage was converted into a "catering style kitchen" for special events.**

#48 State Parks acknowledges the potential of “splitting” cottages designated for park employee housing to increase space for other programs. However, the cottages, in general, are relatively small housing units and splitting them may not provide a reasonable amount of space for an employee and his/her family. Additionally, “splitting” cottages may also have impacts on the historic fabric of the cottage. Please also see response # 31.

#49 Please refer to the changes on the *PPUP* Map 5. Cottage # 45 is still proposed for operations and maintenance but # 5 has been changed to possible use for employees, interpretive docents, program use or a house museum. The sitting area could be used by the public.

#50 Thank you for your comment, an outbuilding will be added for Visitor Center use.

#51 The archives may be moved to Cottage # 5 and away from the creek and potential flooding.

#52 Thank you for your comment, the pedestrian bridge, while shown on the Investigations and Interim Protection Plan has been added to Sections 2.1.1 and 4.2.10 as a permanent feature of the Historic District.

- 48 [III. **Park Staff Security Housing** – We understand the importance of park staff security housing. The private security companies that have been in place at the Historic District since the residents have moved out have provided a minimal level of service. This would not be a practical alternative given the large amount of overnight visitors that will be staying at Crystal Cove upon completion of the project. This need could be best accomplished by trained park personnel as opposed to an independent outside security company.

The proposed plan calls for 5 cottages for this use including Cottage #21, #14, #27, #26 and #30. Cottage #26 and #30 each have two or more multiple units, one upper and one lower. We recommend utilizing four cottages for staff housing instead of five, and doubling up on staff in Cottage #26 to accommodate the same amount of units for park staff housing needs. That frees up Cottage #30 that could then be used for visiting artists and scientists programs. Cottage #30 actually has 3 small separate units that could then be used for this program that was original outlined in the vision statement.
- 49 [IV. **CCHD Park Operations and Maintenance Office** – The proposed plan calls for two cottages for this purpose. This includes Cottage #5 at the entrance and Cottage #45 directly across the road. One cottage for this use would seem more reasonable. Garage space could also be added to satisfy these needs. Currently at Crystal Cove there are approximately 23 garages. We recommend that Cottage #45 and the 2 garages immediately adjacent to it be used to accommodate these needs. You could connect Cottage #45 to these garages via an interior access doorway if necessary.
- 50 [V. **Visitor Orientation Center** – The proposed plan identifies Cottage #0 for this use. This is an excellent location for this use. Cottage #0 is in the center of the park and everyone visiting the Historic District must pass by here.
- 51 [VI. **Archive Center** – The proposed plan has identified that this be housed in the storage area behind Cottage #0. This area is within the flood plain and has been historically damaged due to heavy rains. It is not unusual to see water coming up and over the embankment at the rear of this cottage. This watershed will increase in the years to come with the additional grading and paving that is planned above Crystal Cove at the Irvine Company housing project. Perhaps the Archive Center could be located over at the Los Trancos parking lot in a proposed future structure.
- 52 [VII. **Outdoor Multi Use Commons Area/Outdoor Learning Center** – This will be a wonderful use for this area. By reconstructing the original pedestrian access bridge, ADA access to this area will be made possible. This area will then be able to provide much needed space for informal outdoor classrooms as well as a space for special events and a potential profit center for the park.

#53 Check in at Los Trancos was considered during the development of the *PPUP*. However, having on-site check in requires less staff and helps to keep the operational costs down. It would also allow the overnight guests the ability to leave their luggage in the Historic District before they park at Los Trancos. Cottage #35 also allows the manager of the overnight program good visibility from the deck to direct or point out CCHD locations to visitors. This also allows the manager the capability for informal observation or surveillance of CCHD. Although there may be changing needs over time, the commitment to overnight accommodations is a permanent commitment and a primary *PPUP* adaptive use program that continues a historic use/experience which serves the general visiting public. Art serves a specific user group that is one of several active interests at the Historic District. It may be possible to utilize part of the classroom facility for art on an occasional basis.

State Parks agrees that the arts should be included as a valuable, important, and desirable part of the Crystal Cove Historic District adaptive use program. Due to the number of competing and worthwhile adaptive uses for the Crystal Cove cottages, shared use of cottages and facilities will be essential to the flexibility needed to provide opportunities for the many proposals and programs that are appropriate to Crystal Cove. The *PPUP* considers arts to be one program that would share in the use of the public and flexible use facilities proposed for Crystal Cove. The *PPUP* offers the following opportunities for shared use of facilities that could be a part of a Crystal Cove arts program:

- Existing activity involving artists and art classes using Crystal Cove as a subject for artwork would continue and be encouraged.
- The multi-use classroom (cottage #34) can be reserved for art classes, seminars, and special exhibits (if the exhibit facility is not large enough) or events.
- The Outdoor Commons area can also be reserved for art classes, seminars, or special events. Adjacent support facilities (cottages #42, #43, or #44 could be used for lesson or presentation preparation).
- Several of these facilities may be used for a large special event involving the Village Center area such as past Conservancy fund raising events or perhaps as a remote venue for the annual Laguna Beach Arts Festival.
- Crystal Cove related art can and should be displayed in more than one location or time. Possible locations can be the exhibit/demonstration facility, the multi-use classroom facility, the visitor orientation center, and the café.
- Sale of Crystal Cove related art could be made available in several ways. There could be special events that would be located in several cottages and the Village Center area. There could be scheduled exhibitions in the exhibit/demonstration facility and/or multi-use classroom facility such as past Conservancy fund raising events

VIII. Multi-Purpose Meeting/Classroom Facility or Crystal Cove Educational & Cultural Center – The proposed plan identifies Cottage #34 and the adjacent studio for this use. This use could be greatly enhanced as a profit center if Cottage #35 could also be added. This would then provide sufficient space for a Crystal Cove Art Center. Paintings created here could then be sold in the park to raise funds for the Historic District. Paintings could also be donated to the Park to establish a private Crystal Cove art collection. The previously established Arts in the Park program could then continue and flourish. We need to support artists in the furtherance of the arts. Historic paintings from the past are now prized. If we truly support the arts, today's paintings will be what will be prized for tomorrow.

“Park Stewardship Through the Arts” programs are presently offered at Joshua Tree National Park. This could be used as a role model for how this could work within the Historic District. Here, they also offer artist in residence programs. Please visit www.artmojave.org for additional information on how some of their programs operate.

To date, the Alliance to Rescue Crystal Cove and the Crystal Cove Conservancy have raised \$60,000.00 through the sale of paintings of Crystal Cove. This is by far the most proven and effective means for raising funds for the Historic District. This could then become a permanent on going profit center for the park.

As for an alternative location for the Overnight Rental Office, Resident Manager's Quarters and Registration, please see below.

IX. Park & Community Rotating Exhibit Facility – The proposed plan has identified Cottage #46 for this use. We recommend that Cottage #15 be used for a rotating exhibit facility for the following reasons:

- A. Cottage #15 has sufficient wall space for flexible exhibit and interpretive space for changing exhibits related to the resources of the Crystal Cove area.
- B. Cottage #15 could also provide for an excellent venue for the exhibit and sale of art for fundraising purposes.
- C. The proposed plan identifies Cottage #46 for this use. This cottage is very small and has limited wall space. In addition, we feel that Cottage #46 would be better utilized as the Beach Store Concession. (See Beach Store Concession for more details on this use.
- D. The front patio area of Cottage #15 could still have outdoor table seating to accommodate people that have purchased a pre-packaged sandwich from the Shake Shack or Cottage Cafe.

- The Overnight Accommodations Program could include an overnight workshop subprogram that would provide short-term cottage accommodations for artists as well as research visitors participating in a Crystal Cove program or activity. This could make a range of cottage choices available in a flexible manner that could adjust to changing needs or circumstances. When there is no participant in the overnight workshop program, then overnight cottages would continue to be available to the general public. This would allow for flexibility and optimum shared use of available cottages.

Providing a permanent home for an art organization would be considered an exclusive use. Exclusive use was a primary criticism and reason for public opposition causing cancellation of the previous Crystal Cove concession proposal. A primary PPUP objective is to provide broad public access and use and avoiding exclusive use.

Overnight accommodations will be the primary adaptive use within the Historic District. It is a use that will serve the broadest public and provide a unique visitor experience that is most directly related to the original reason that Crystal Cove and its cottages were created...overnight accommodations for coastal recreation and enjoyment. Efficient and viable operating arrangements will be critical to First Phase rehabilitation visitor use as well as a completed PPUP development. This means that combining the registration office and manager's residence in the Historic District will provide for easier availability of overnight accommodation staff to overnight guests as well as a more effective operation of the overnight accommodation program. In addition, this avoids the construction and cost of a new facility that would reduce the Los Trancos coastal access parking capacity. For these reasons, Cottage #35 should remain as the preferred location for the overnight registration office and manager's residence.

#54 Thank you for your comment. Cottages that cannot be used for other adaptive uses could also become house museums, as appropriate.

#55 Thank you for your comment. The *PPUP* does indicate that these designations are flexible.

#56 Please see response #53.

- 54
- X. **Crystal Cove House Museums** – The proposed plan calls for two cottages for this purpose. We feel this is appropriate in order to educate the park visitor about the rich historical significance of the Crystal Cove Historic District. These cottages could then contain exhibit rooms for the 3 different CCHD eras. Park visitors are very interested in the colorful history of the cove and enjoy walking back in time by viewing historic photographs and exhibits. My experience with this relates to the last year that I have personally guided tours through the Historic District. People on my tours are always fascinated with the old historic photos and stories related to the cove.
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- XI. **Underwater Park Education Center** – The proposed plan has identified Cottage #13 for this use. We feel that this is an important educational component for the Park and we fully support this use.
- XII. **Overnight Rental Office, Resident Manager’s Quarters and Registration** – The proposed plan identifies cottage #35 for this use. It seems that the location for overnight guest registration would be more practical if it were located in the Los Trancos Parking Lot and staging area for the following reasons:
- A. On the proposed plan, overnight guests would drive onto the upper bluff of the Historic District, park and check in. Then they would drive across Pacific Coast Highway to park and unload. Then they would be shuttled back into the Historic District for lodging purposes. By removing guest registration from the Historic District we could then eliminate some of the traffic and congestion.
- B. Cottage #18 on the bluff top could then be used to meet the requirement for an on-site resident manager unit as well as help to oversee the dormitory-style accommodations.
- 56
- XIII. **Individual-Style Accommodations (up to 31 cottages)** – We support this.
- XIV. **Dormitory-Style Accommodations (up to 4 cottages)** – We support this.
- XV. **Visiting Artists and Scientists Program/Guest Teachers and Guest Researchers** – The proposed plan has not allocated any cottage for this use. As previously mentioned above, Cottage #30 actually has 3 small separate units. This would be an excellent location for visiting artists, scientists, guest teachers and guest researchers.
- As mentioned previously in item VIII. , “Park Stewardship Through the Arts” programs are presently offered at Joshua Tree National Park. Here, they also offer artist in residence programs. Please visit www.artmojave.org for additional information on how some of these programs might operate at Crystal Cove. These could also be offered during the “off-season”.

#57 State Parks will follow its existing concession policies. Although the term of 5 years is a good goal, the terms of the future concession agreements will need to incorporate both the PPUP guidelines (which are restrictive) and economic feasibility. This may affect the length of the contract depending on the contractor's investment in the site. Please also see response #35.

#58 It is State Parks preference to keep the flexible exhibit in Cottage # 46 because it is working well under the Interim Plan and it is centrally located. The location of the store needs to be flexible and may not require a cottage, instead using a portion of a cottage, an outdoor area, or a seasonal tent.

#59 Please see response # 53.

December 2, 2002

Tina Robinson
California Department of Parks & Recreation
8885 Rio San Diego Dr., Suite 270
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Re: Crystal Cove Preservation and Public Use Plan

On behalf of Laguna Plein Air Painters and The California Art Club, we submit to you the following comments which have to do with the Multi-use/Educational/Art Facility and the new idea of the Short Term Residence Program.

Comments having to do with all other areas of the PPUP are comments that are coming from me based upon my work with The Alliance to Rescue Crystal Cove and the gathering of information for the Crystal Cove Archives. These views are not necessarily the same views that you may receive from the ARCC.

After reviewing the recent General Plan Amendment we support the overall concept of the combining overnight accommodations, scientific research, some staff housing and an educational center to include art and cultural programs.

Multi-use Educational and Art Facility #34 (Japanese Schoolhouse)

This is an excellent location for the multi-use facility. The bluff top is an ideal location to teach plein air painting. Landforms melt into the distance as the atmospheric conditions lighten the sky and let the horizon line melt into the sea. The old Japanese School House is the perfect location for this use!

There is also an opportunity with the use of the cottages #34 and #35 together to create a world class Multi-use Educational and Art Center. Ongoing classes pertaining to the Arts could take place in one cottage while the other cottage could be used for a variety of environmental and scientific programs.

59 By adjoining the two backyard areas into one large space a new outdoor meeting/learning/event area could be formed. With the additional outdoor area there would be many opportunities for a variety of uses. This space could accommodate over 100 people.

Special events such as the 2001 collaborations between and the Crystal Cove Conservancy (CCC), the Alliance to Rescue Crystal Cove (ARCC) and the Laguna Plein air Painters Association (LPAPA) could be ongoing. Art events in 2001 with the above mentioned organizations earned over \$60 thousand dollars to be used for the restoration of cottages and learning facilities within the Crystal Cove Historic District. New events with a variety of different art groups could provide a continuing source of funds for the CCHD restoration programs.

#60 Please see response # 24. During the public workshops, there was not a lot of public support for an artist in residence program at the Historic District. An artist in residence or other similar programs could be organized on a special event basis but not on a permanent basis. The artist support at the Historic District can be incorporated into the CARE program.

Information - No Response Necessary

The History of Plein Air Painters in Laguna Beach and Crystal Cove

We can thank the early impressionist painters who traveled here in the late 1800's for providing some of the first colorful documentation of the untamed beauty and pristine coastline with its protected coves, vertical bluffs and scalloped beaches. William Wendt painted "*The Old Coast Road*", south of Laguna Beach, in 1906. However, it was 1919 when the one lane dirt road was completed between Laguna Beach and the next village to the north, Corona del Mar.

In the early 1900's Laguna Beach became a destination for artists as well as other hearty Americans. The railroad ran from Los Angeles to San Diego, and travelers would get off in El Toro and then take the stagecoach down the winding dirt trail from El Toro to the seaside.

The artists that first arrived in Laguna Beach were responsible for promoting Laguna Beach as an art colony. They also helped to form the infrastructure for the town itself. Anna Hills (1882-1930) started the Laguna Beach Fire Department and was also the first to plant trees along Laguna Canyon Road. In 1918, the artists of Laguna Beach founded the Laguna Beach Art Association, the forerunner of the Laguna Art Museum.

"Artists had a direct influence on the overall economy by attracting tourist, art collectors and students. Even more importantly was the distinction these artists conveyed upon Laguna Beach as a cultural oasis". (Quote from "*The California Impressionists of Laguna*")

Many of the early California impressionist painters who first came to Laguna Beach were members of "The California Art Club", founded in 1909 by Franz Bischoff (1864-1929), Carl Oscar Borg (1879-1947), Hanson Puthuff (1875-1972), and William Wendt. These artists were steeped in diligent traditional training from such respected institutions as Art Institute of Chicago, the Art Students League in New York, the L'Ecole des Beaux-Arts and the Academie Julian in Paris.

William Wendt and George Gardner Symons (1861-1930) first came to Laguna Beach in the early 1900's. California artists favored a variant of French impressionism as the appropriate style for interpreting the states color, attitude and sunlight. Impressionisms high-key colors and broken brushwork captured the shimmering Southern California light and brilliant sunshine.

At Crystal Cove there is a synchronism between man, architecture, and nature as proven by this successful partnership of over 80 years. Even in the early twentieth century there was a natural harmony and "sense of spirit" created by the wonderful synergy of all things melding together in just the right way.

Information – No Response Necessary

William Wendt must have felt this "sense of spirit" when he painted "*Crystal Cove*" in 1912. This feeling is also apparent in Jack Wilkinson Smith's (renamed) painting "*Crystal Cove State Park*". Painted in 1923 this painting captures the brilliant blue ocean set against dramatic sunlit cliffs.

Arthur Riders (1886-1976) painting titled "Near Laguna", with its palm thatched buildings would most assuredly be the entry to Crystal Cove. Although the actual date of this painting is unknown it was probably from the mid-twenties. Rider was a scenic artist for MGM and Fox Studios. The cottages at Crystal Cove were originally built to create tropical backdrops for filming south sea island types of movies about the same time.

We believe that the painting "*Iridescent Evening*" by Frank Cuprien (1871-1948) could have been painted from Crystal Cove. Cuprien was famous for his ability to capture the opalescence of the sea. It is said that he may have been one of the best seascape painters in Laguna Beach.

Over the years many fine artists came to Laguna Beach. Indeed, they are too numerous to count. In addition to those already mentioned, Clarence Hinkle (1880-1960), Thomas Hunt (1883-1938), George Brandiff (1890-1936) and Edgar Payne (1883-1947) are among the many whom made a notable contribution to society by promoting this area and documenting the landscape and life styles of Laguna Beach and neighboring villages.

In 1926 Pacific Coast Highway opened and everything changed. The cottages at Crystal Cove took on their own vernacular character. Crooked stairways, artifacts and the architectural elements that have evolved for generations are the cultural fabric. It is a wealth of history that we love to paint and hope to continue to document for all to enjoy.

Although several times in past, other types of painting have been in vogue, the tradition of Plein air painting has withstood the test of time. As we value the artistic treasures of yesterday, tomorrow we will treasure the paintings of today!

Submitted by Meriam Braselle, Artist Liason for LPAPA and President of Braselle Design Company in Newport Beach, California

#61 Please see responses # 46, # 47, # 53, # 54, and # 58.

#62 The Historic Landscape Management Plan will determine appropriate historic elements to remain within the Historic District in accordance with the U.S. Secretary of Interior's Standards for Historic Properties and Cultural Landscapes. It is anticipated that many of the telephone poles would be considered a contributing feature to the historic landscape. Utilities are proposed in Section 2.1.3 of the EIR.

Comments on the Crystal Cove Preservation and Public Use Plan continued

Manager's residence and overnight check-in

This function is currently slated for cottage #34 however, #18 might work better for the following reasons:

There is existing parking and if most of the check-in process were done prior to entering the CCHD a shuttle would be dropping visitors at their assigned units. Check-in at this location could be limited to late night check-ins. This means less traffic in the CCHD. Also cottage #18 because of its orientation is better for keeping an overview of the bluff and North beachfront areas. (Perhaps #33 could be used to satisfy handicap access requirements if this type of accommodation is necessary on the bluff).

Food Services and Cafe

61

We feel that this program would be better in cottage #5 than in #15. The reasons for this suggestion is that there is more space for storage, trash pick-up and deliveries. Also this cottage is closer to the entry and would cause less congestion. In addition there is room for a restroom facility. *

The Store

The store should be moved to the current visitor center because of convenience and more importantly this building has historically been the "store".

Restroom facilities

It is our feeling that there should be a central restroom/shower facility at the Hollow area tucked into the East side of cottage #5.

Perhaps the area between cottages #20 and #25 would be another restroom/shower area. (It looks as if there may be some slope restablization work taking place in this area at which time plumbing lines could be added)

House Museums

We think that there should be 2 museums. The first could be thatched and furnished appropriately for the 1920' to 1930's.

The second could be 1940's to 1950's style. Perhaps the Visitor/information center could be restored to serve as a visitor center and also used as a museum.

Telephone poles

62

We like the telephone poles for the aesthetic and historic values (and for bird perches). A new underground cable/internet/phone system should be added for safety.