

Appendix A Notice of Preparation & Scoping Comments

Contains:

- Notice of Preparation, dated November 18, 2021
- Public Scoping Comments, received November 22 through December 22, 2021

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City of Saratoga Notice of Preparation of an Environmental Impact Report

Project Title: Saratoga Retirement Community Master Plan Update
Owner: Odd Fellows Home of California
Applicant: Ankrom Moisan Architects for Saratoga Retirement
Community/Pacific Retirement Services, Inc.
Attn: Chris Dalengas
Project Location: 14500 Fruitvale Avenue, Saratoga, California
Assessor's Parcel Number: 397-12-012, 397-12-019, and 397-40-006

As the Lead Agency, the City of Saratoga (City) intends to prepare an Environmental Impact Report (EIR) for the proposed project referenced above. As required by the California Environmental Quality Act (CEQA), the City has prepared this Notice of Preparation (NOP) to inform recipients that the City is beginning the preparation of the EIR and to solicit comments concerning the scope and content of the environmental review.

The following pages of this NOP include a brief description of the proposed project, the project location, and a summary of the potential environmental effects to be analyzed in the EIR. The City welcomes your input regarding the scope and content of the environmental information to be included in the EIR. Information on how to provide comments to the City about the environmental analysis is provided below.

The public scoping period for this EIR is from **Monday November 22, 2021 through Wednesday December 22, 2021, 5:00 p.m.** In accordance with CEQA, comments on this Notice of Preparation are due within 30 days of its receipt. Please send your comments to the following address, with the subject line "Saratoga Retirement Community."

City of Saratoga, Community Development Department
Attention: Cynthia Richardson
13777 Fruitvale Avenue
Saratoga, CA 95070
E-mail: crichardson@saratoga.ca.us

A Public Scoping/Community Meeting to provide an overview of the project, summarize the CEQA review process, and solicit comments on the Notice of Preparation will be held:

6:00 p.m. on Thursday December 9, 2021

Due to current restrictions on public gatherings due to the global COVID-19 pandemic, the scoping meeting will be held entirely by teleconference. The public will not be able to attend the meeting in person, but may view and participate in the meeting virtually by either:

- Using the Zoom Website: please click the link below to join the webinar:
<https://us02web.zoom.us/j/89318105542>
- Using the Zoom App: Webinar ID: 893 1810 5542
- Calling: US: +1 408 638 0968 or +1 669 900 6833 or +1 253 215 8782 or +1 346 248 7799 or +1 646 876 9923 or +1 301 715 8592 or +1 312 626 6799

In accordance with the Americans with Disabilities Act, if you need assistance to participate in this meeting due to a disability, please contact the City Clerk at bavrit@saratoga.ca.us or calling 408.868.1216 as soon as possible before the meeting. The City will use its best efforts to provide reasonable accommodations to provide as much accessibility as possible while also maintaining public safety.

Approved by:

Debbie Pedro, Community Development Director



11/18/21

Signature

Date

Description of the Project

Project Location

The Saratoga Retirement Community (SRC) campus is at 14500 Fruitvale Avenue, in the City of Saratoga, on three contiguous parcels totaling approximately 37 acres. The SRC campus is located within a predominantly residential neighborhood, approximately halfway between State Route 85 to the northeast and State Route 9 to the southwest. The West Valley College Campus is located approximately a quarter of a mile to the north of the SRC. The project location is shown in **Figure 1**, attached.

Project Background and Existing Facility

The Saratoga Retirement Community is a private residential community for seniors, which is centered around the Saratoga Manor (the Manor), a Mission Revival-style building that was constructed in the early 1900's by the Independent Order of Odd Fellows (IOOF) to care for older members of the order. The Manor, also known as the Odd Fellows Home, is listed on the City of Saratoga's Historic Resources Inventory.

On February 21, 1996, the City Council approved an increase to the number of residential units permitted at SRC from 170 to 307 units (164 independent living units and 143 assisted living units) and an increase in the number of skilled nursing beds permitted from 68 to 99 beds. SRC did not build all the units permitted in 1996.

The facility currently has 249 residential units (143 independent living units and 106 assisted living units) and 94 skilled nursing beds. Independent living units are provided within the Manor building, two apartment buildings, and 20 villas/cottages. Assisted living units are provided within an assisted living building which contains 88 assisted living beds and 18 memory care beds. The 94 skilled nursing beds are located within the health care building. A fitness center is also present at the site.

Project Description

The applicant is seeking approval to construct three new residential buildings, a new meeting room addition to the existing Manor building, and an expansion to the existing fitness center. The proposed project also includes a reduction in the number of existing memory care and skilled nursing beds at the facility, to accommodate increased patient preference for private single-occupancy rooms rather than the current double occupancies. If approved, the proposed project would result in a total of 298 residential units (195 independent living units and 103 assisted living units) and 52 skilled nursing beds at the facility. The proposed site plan is shown in **Figure 2**, attached.

Building A would be constructed within the existing garden/recreation area south of the Manor building and north of the Fitness Center. The proposed building would contain 22 independent living residential units on two floors (total area 35,898 square feet [SF]) with one level of below-grade parking (16,879 SF) containing 34 parking spaces. The height of Building A above average grade would be approximately 37 feet, and the total building footprint would be 17,949 SF.

Building B would be constructed within the parking lot north of the Manor building. The proposed building would contain 10 independent living units on two floors (total area 28,475 SF), with a partial level of at-grade parking and one level of below-grade parking. A total of 64 parking spaces (31,710 SF) would be provided. The height of the building above average grade would be approximately 27.5 feet, and the total building footprint would be 24,659 SF.

Building C would be constructed within the parking lot north of the Assisted Living building. The building would contain 20 independent living units on three floors (total area 41,715 SF), with a partial level of at-grade parking and one level of below-grade parking. A total of 77 parking spaces (25,899 SF) would be provided. The height of the building above average grade would be approximately 40.5 feet, and the total building footprint would be 18,509 SF.

The Meeting Room addition would be attached to the west of side of the Manor building at its existing doorway. The main floor of the addition (4,792 SF) would contain a meeting room (3,259 SF) and associated storage and lobby areas, with one floor of at-grade parking (7,043 SF) below.

The Fitness Center addition would be constructed west of the existing Fitness Center building, connecting to the southern side of the corridor between the fitness room and pool. This single-story building would be approximately 1,065 SF in area, and just over 16 feet in height above average grade.

A total of 52 new independent living residential units would be constructed as part of the proposed project (22 in Building A, 10 in Building B, and 20 in Building C), bringing the total number of independent living units on the property to 149. There would be no change to the number of

existing independent living units within the Manor building, two Apartment Buildings, and Cottages, and no change to the number of assisted living units within the Assisted Living building.

The number of memory care beds within the Assisted Living building would be reduced from 18 to 15 (i.e., a reduction of 3 memory care beds), and the number of skilled nursing beds within the Health Care building would be reduced from 94 to 52 (i.e., a reduction of 42 skilled nursing beds). The number of memory care and skilled nursing beds is proposed to be reduced due to conversion of semi-private double-occupancy rooms to private single-occupancy rooms.

Recreational facilities displaced by construction (i.e., the putting green and bocce ball court) would be relocated to the west of Building A. The proposed project would also include a public trail connection along Oddfellows Drive, connecting Fruitvale Avenue with the San Marcos Open Space, via Chester Avenue, Gypsy Hill Road and Via De Marcos.

Potential Environmental Effects of the Project

The EIR will identify the significant environmental effects anticipated to result from implementation of the proposed project. As allowed by CEQA Guidelines §15063(a), an Initial Study has not been prepared for the proposed project because an EIR will clearly be required. Due to the location of the project site in an urban area that is not within or close to any agricultural or forestry resources or known mineral deposits, these environmental topics will not be addressed in detail in the EIR. The EIR will evaluate all other environmental issues pursuant to CEQA and the CEQA Guidelines, including:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise and Vibration
- Recreational Resources
- Population and Housing
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

It is anticipated that the primary focus of analysis will be on the specific environmental topics outlined below. Mitigation measures will be identified to reduce or avoid significant impacts, as appropriate.

Aesthetics

The EIR will describe the existing zoning and other regulations governing scenic quality and assess whether the proposed project would conflict with such regulations. Light and glare impacts will also be evaluated.

Air Quality

The EIR will address the regional air quality conditions in the Bay Area and discuss the proposed project's impacts to local and regional air quality according to the 2017 Bay Area Air Quality Management District guidelines and thresholds, focusing on temporary construction-related impacts such as construction vehicle exhaust and dust, as well as ongoing operational impacts from resident/employee vehicle movements or stationary sources such as generators.

Biological Resources

The EIR will describe existing biological resources in the project vicinity and address any biological resource effects associated with the proposed project, including impacts to habitats and special-status species, including nesting birds.

Cultural and Tribal Cultural Resources

The Manor Building (formerly known as the Odd Fellows Retirement Home) was constructed in 1912. It is eligible for listing on the California Register of Historic Resources and is listed in the City's Heritage Resource Inventory, and is therefore considered a historical resource for the purpose of CEQA. As a result, the EIR will discuss the potential effects of the proposed project on this historic resource. The EIR will also discuss the potential for prehistoric and Native American cultural resources to be located in the project area.

Energy

The EIR will examine the potential for the proposed project to result in excessive or inefficient use of energy and will discuss any energy conservation measures included as part of the proposed project.

Geology & Soils

The project site is located within a seismically active region. The EIR will discuss possible geological impacts associated with seismic activity and the existing soil conditions on-site, as well as potential impacts to geological resources such as fossils.

Greenhouse Gas Emissions

The EIR will describe the regulatory context surrounding the issue of global climate change and will evaluate the proposed project's greenhouse gas emissions and contribution to global climate change, in conformance with the methodology of the Bay Area Air Quality Management District and any other applicable criteria.

Hazards & Hazardous Materials

The EIR will summarize hazardous materials conditions on and adjacent to the project site and identify any potential contamination that could affect construction workers and/or nearby receptors, such as SRC residents, other nearby residents, school and daycare facilities, and recreational areas.

Hydrology & Water Quality

The EIR will describe the existing hydrologic and drainage conditions at the project site, as well as changes in site drainage and hydrological conditions that may result from the proposed project. The EIR will address the possible impacts of the proposed project on stormwater, surface water, and groundwater quality.

Land Use and Planning

The EIR will describe the existing land uses on and adjacent to the project site. Land use impacts that would occur as a result of the proposed project would be analyzed, including impacts due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Noise and Vibration

The EIR will describe existing noise conditions in the project area and evaluate the potential for noise and vibration generated by the proposed project to exceed applicable noise standards and adversely affect sensitive receptors in the area such as SRC residents. The EIR will address temporary construction-related impacts such as construction equipment and worker vehicles, as well as ongoing operational noise from daily resident/employee vehicle movements or stationary sources such as air conditioning units.

Population and Housing

The EIR will assess whether the proposed project would induce unplanned population growth in the area or displace substantial numbers of existing people or housing.

Public Services and Recreational Resources

The EIR will discuss the availability of public facilities and service systems (including police and fire services, parks, schools, and libraries) and recreational resources in the project area, and the potential for the proposed project and related projects to require the construction of new or expanded facilities.

Transportation

The EIR will describe the existing transportation network and analyze the impacts of the proposed project, including whether the proposed project would conflict with applicable transportation planning policies, result in a substantial increase in vehicle miles travelled, create a traffic safety hazard, or impact emergency access. The EIR will address construction-related traffic, as well as operational traffic generated by SRC residents and staff.

Utilities and Service Systems

The EIR will describe the existing utilities, including potable water supply and wastewater systems, serving the project area. The EIR will evaluate the proposed project's effects on these utilities.

Alternatives

The EIR will identify and evaluate a reasonable range of alternatives to the proposed project that would feasibly attain most of the project's basic objectives, but would avoid or substantially lessen any of the project's significant effects. As required by CEQA, the EIR will also analyze a "No Project" alternative. Other alternatives that seek to reduce the significant environmental impacts of the project will be identified. Alternatives discussed will be chosen based on their ability to reduce or avoid identified significant impacts of the project while achieving most of the identified objectives of the project (see CEQA Guidelines Section 15126.6).

The EIR will identify the degree to which each alternative might avoid or substantially lessen one or more of the project's significant environmental impacts, whether the alternative could result in other or increased impacts, and the degree to which the alternative would feasibly accomplish most of the project's basic objectives. In accordance with CEQA, the EIR will identify an environmentally superior alternative, based on the number and degree of associated environmental impacts.

Cumulative Impacts

The EIR will include a discussion of significant cumulative impacts of the proposed project when considered with other past, present, and reasonably foreseeable future projects in the area. This section will cover all relevant subject areas discussed in the EIR (e.g., air quality, noise, traffic), will specify which of the areas are anticipated to experience significant cumulative impacts, and will determine whether the proposed project's incremental contributions are cumulatively considerable. Mitigation measures will be identified to reduce or avoid the proposed project's cumulatively considerable contribution to significant cumulative impacts.

Growth Inducing Impacts

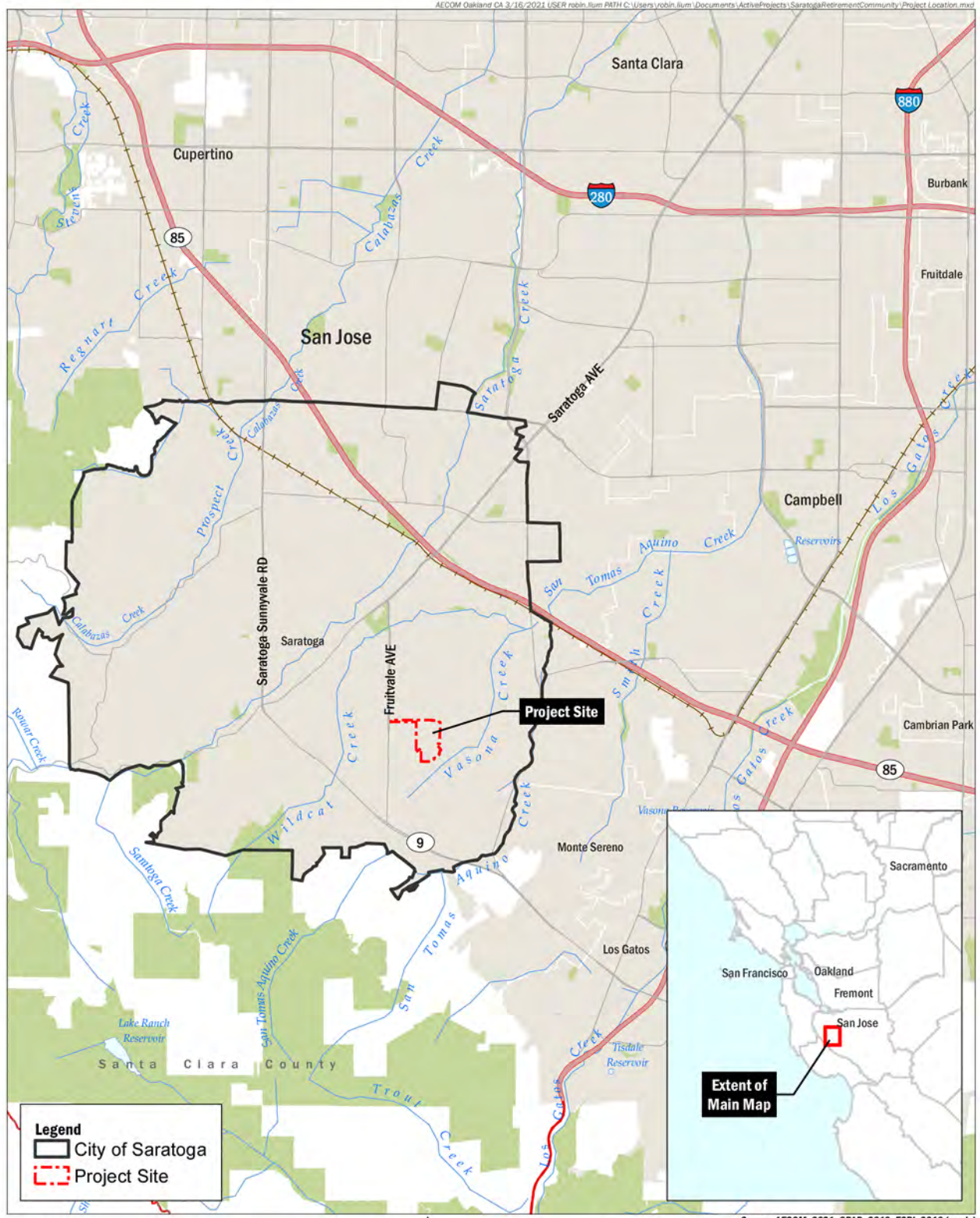
The EIR will qualitatively evaluate the proposed project's potential to induce growth and any subsequent environmental impacts that would occur pursuant to CEQA Guidelines Section 15126(d).

Attachments:

Figure 1 – Project Location

Figure 2 – Proposed Site Plan

Figure 1 - Project Location



AECOM
City of Saratoga
Saratoga Retirement Community Master Plan Update

Source: AECOM, 2021; CPAD, 2019; ESRI, 2016 (roads)

Figure 2 - Proposed Development



AECOM
City of Saratoga
Saratoga Retirement Community Master Plan Update

Source: Ankrom Moisan Architects, 2021



NATIVE AMERICAN HERITAGE COMMISSION

November 24, 2021

Cynthia Richardson
City of Saratoga
13777 Fruitbale Avenue
Saratoga, CA 95070

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1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2021110366, Saratoga Retirement Community Master Plan Update Project, Santa Clara County

Dear Ms. Richardson:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a.** A brief description of the project.
 - b.** The lead agency contact information.
 - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a.** Alternatives to the project.
 - b.** Recommended mitigation measures.
 - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a.** Type of environmental review necessary.
 - b.** Significance of the tribal cultural resources.
 - c.** Significance of the project's impacts on tribal cultural resources.
 - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

Rawnsley, Emma

From: Cynthia Richardson <crichardson@saratoga.ca.us>
Sent: Friday, December 17, 2021 12:43 PM
To: Rawnsley, Emma
Subject: [EXTERNAL] Fw: SRC Expansion Plan: Residents' Alternative Submission

FYI



Cynthia Richardson | Consultant Planner
City of Saratoga | Community Development Department
13777 Fruitvale Avenue | Saratoga, CA 95070
crichardson@saratoga.ca.us | www.saratoga.ca.us

From: Preserve SRC Campus <info@preservesrccampus.org>
Sent: Thursday, December 16, 2021 4:32 PM
To: Debbie Pedro <dpedro@saratoga.ca.us>; Cynthia Richardson <crichardson@saratoga.ca.us>
Cc: James Lindsay <jlindsay@saratoga.ca.us>; John Cherbone <jcherbone@saratoga.ca.us>; Yan Zhao <yzhao@saratoga.ca.us>; Tsing Bardin <Tsingtb@gmail.com>; Bob Berglund <rcbergie@aol.com>; Pat and Dick DuBridge <pddubridge@gmail.com>; Don Schmidek <dis6933@gmail.com>; Tony Vandersteen <anthonyvann79@gmail.com>; Tony Vandersteen <anthonyvann@att.net>; Colin Whitby-Strevens <colin@pandcws.com>; Michael Griffin <jazzbuff@comcast.net>
Subject: SRC Expansion Plan: Residents' Alternative Submission

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Attachments available until Jan 15, 2022
Hello Debbie and Cynthia

Following up our submission last June of our Residents' Alternative Plan to the PRS proposal for the expansion of SRC (re-attached here), I am attaching some documents giving supplementary information and clarification:

- 1) a copy of the Q and A on our web site (preservesrccampus.org), which we believe will correct various statements that have been leveled at our alternative proposal and that we find misleading;
- 2) an updated site plan clarifying some details of our proposed building C';
- 3) a building C' ground plan giving further details of our proposed building C'.

We should be grateful for this additional information, together with all relevant information on our website (preservesrccampus.org), be considered in the Environmental Impact Review of the PRS proposal.

Thank you

Colin Whitby-Strevens, on behalf of the group of residents

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Residents' Alternative Submission for SRC Expansion 20210621.pdf

34.4 MB

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Addendum to City Submittal.pdf
311 KB

[Click to Download](#)

Alternative proposal Site Plan 20210927.pdf
4.6 MB

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Alternative proposal Building C' 20210927.pdf
1.3 MB

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Preserve SRC Campus Group
info@preservesrccampus.org

Debbie Pedro, Director, Community Development
Cynthia Richardson, Consultant Planner
City of Saratoga, Community Development Department
13777 Fruitvale Ave
Saratoga, CA 95070

Subject: Residents Alternative

June 21, 2021

In accordance with *The California Environmental Quality Act (CEQA) (Title 14, California Code of Regulations), Chapter 3, Guidelines for Implementation of the CEQA, Article 9, Contents of Environmental Impact Reports, Section 15126.6, Consideration and Discussion of Alternatives to the Proposed Project*, the undersigned individuals, all current residents of the Saratoga Retirement Community, do hereby submit the attached “Residents’ Alternative Plan for the Saratoga Retirement Community” to the City of Saratoga for consideration and inclusion as an alternative in the Environmental Impact Report proceedings for the expansion of the Saratoga Retirement Community project submitted by Pacific Retirement Services (PRS).

We believe this alternative plan is a more acceptable alternative for the expansion of the Saratoga Retirement Community (SRC). It provides less construction impact on the current senior residents of SRC, significantly reduces the environmental impact on the historic rural campus of the Odd Fellows, provides an up to date, competitive right sized Skilled Nursing Facility, and provides the same number of additional Independent Living units (52) as the PRS plan to assure SRC’s future sustainability.

We would welcome the opportunity to discuss this alternative plan further with you and others at your earliest convenience.

Attachments:

Residents’ Alternative Plan for Saratoga Retirement Community
Narrative and Exhibits A thru O (20 pages)

Respectfully,

Tsing Bardin

Don Schmidek

Robert Berglund

Anthony Vandersteen

Richard DuBridge

Colin Whitby-Stevens

Michael Griffin

cc: James Lindsay , City Manager
John Cherbone , Director, Public Works
Yan Zhao, Mayor, Saratoga

Residents' Alternative Plan for Saratoga Retirement Community

Pacific Retirement Services (PRS) has submitted a plan to the City of Saratoga for expansion of the Saratoga Retirement Community (SRC) facility which results in an additional 52 apartment units, an Auditorium building and an extension to the Fitness Center. In this plan PRS requires 5 buildings and 4 underground garages taking up all currently open areas of the SRC campus including infringing on the iconic **Historical Odd Fellows (IOOF) Manor** building and the elimination of the **IOOF Historical Park** and all of the residents' outdoor recreation facilities. See Exhibit B.

The plan is based on PRS's perception of the need to upgrade the SRC facility and address their requirement for more revenue to counter a potential reduction in healthcare reimbursements by the government in the future. However, the plan creates a significant negative impact on the quality of life of the current and future residents.

To address this issue a number of the current residents formed a group aimed at providing an acceptable alternative building plan which would substantially reduce the impact to the quality of life of residents and lessen the environmental impact on the campus while accomplishing equivalent goals for SRC sustainability in the future. See Exhibit C.

The Residents' Alternative directly addresses the outstanding issue at SRC, the outdated and oversized Skilled Nursing Facility (SNF) of 94 beds in rooms without showers which is currently being operated primarily for non SRC residents.

While currently producing significant revenues, the SNF is an inefficient use of staffing resources to satisfy the reduced number of patients in the overly large building and creates potential competitive disadvantages. PRS also recognizes this problem and, while it's not included in their Project submittal to the City, they plan to reduce the SNF to about 52 single bed suites with ensuite bathroom and shower by doing the necessary construction on 52 rooms over several years. While this will accomplish the necessary reduction of beds it will significantly impact the patients living in the SNF while the piecemeal construction is performed. The Residents' Alternative avoids this problem.

The Residents' Alternative approach starts with converting one of the PRS planned buildings (Building C) to a state of the art two (2) story Skilled Nursing Facility (SNF) of about 40 single bed rooms with en-suite bathrooms and showers and is the appropriate size for the SRC facility. The new SNF (Building C') will also include offices, therapy facilities, a kitchen and dining room for the patients. Additionally, this location is much more efficient to evacuate the SNF patients in an emergency as it is directly opposite the proposed new emergency access from Chester Ave.

We recognize that this facility would need to be constructed under OSHPD regulations with its stringent requirements. However, according to some independent contractors who have built skilled nursing facilities in California in recent years, modern construction practices and OSHPD programs promoting construction efficiencies make this a practical approach, allowing design (10 months) and permitting (8 months) to be completed in 18 months. Construction of the

garage and building follows with completion in about 30 months. SRC's Skilled Nursing Facility would therefore become a modern, appropriately sized facility, which is technically up to date and acceptable for future SRC competitiveness and sustainability.

Once the new Skilled Nursing Facility is completed the patients in the old SNF would be relocated over a 1 month period to the new facility. The old SNF would then be razed and the site prepared over the next 2 to 3 months for rebuilding, at which time construction would begin on the new Independent Living (IL) Building using the same footprint as the old SNF.

Construction would start by building an underground parking garage with approximately 90 spaces with entry and egress on McLaren Lane. This would take about 12 months. Above the the garage, a two (2) story Apartment Building (Building D) of 79,780 square feet would be constructed containing 52 IL units. As part of Building D, a 3000 square foot, Auditorium would be built facing the intersection of McLaren Lane and Colfax Lane. The total construction of these new facilities would take about 18 months, for a total construction of about 30 months.

The extension to the Fitness Center would be constructed in parallel with the construction of Building D. It would be consistent with the facility plan shown in the PRS project submittal to the City of Saratoga.

The PRS plan includes a new emergency entrance from Chester Road. We also include this in our plan.

The final step in this Residents' Alternative would be similar to the PRS plan, to construct an additional dining facility inside the Manor Building to accommodate the additional IL Residents. This would take place in parallel with the construction of Building D.

We attach a set of Exhibits (A thru O) illustrating our Residents' Alternative

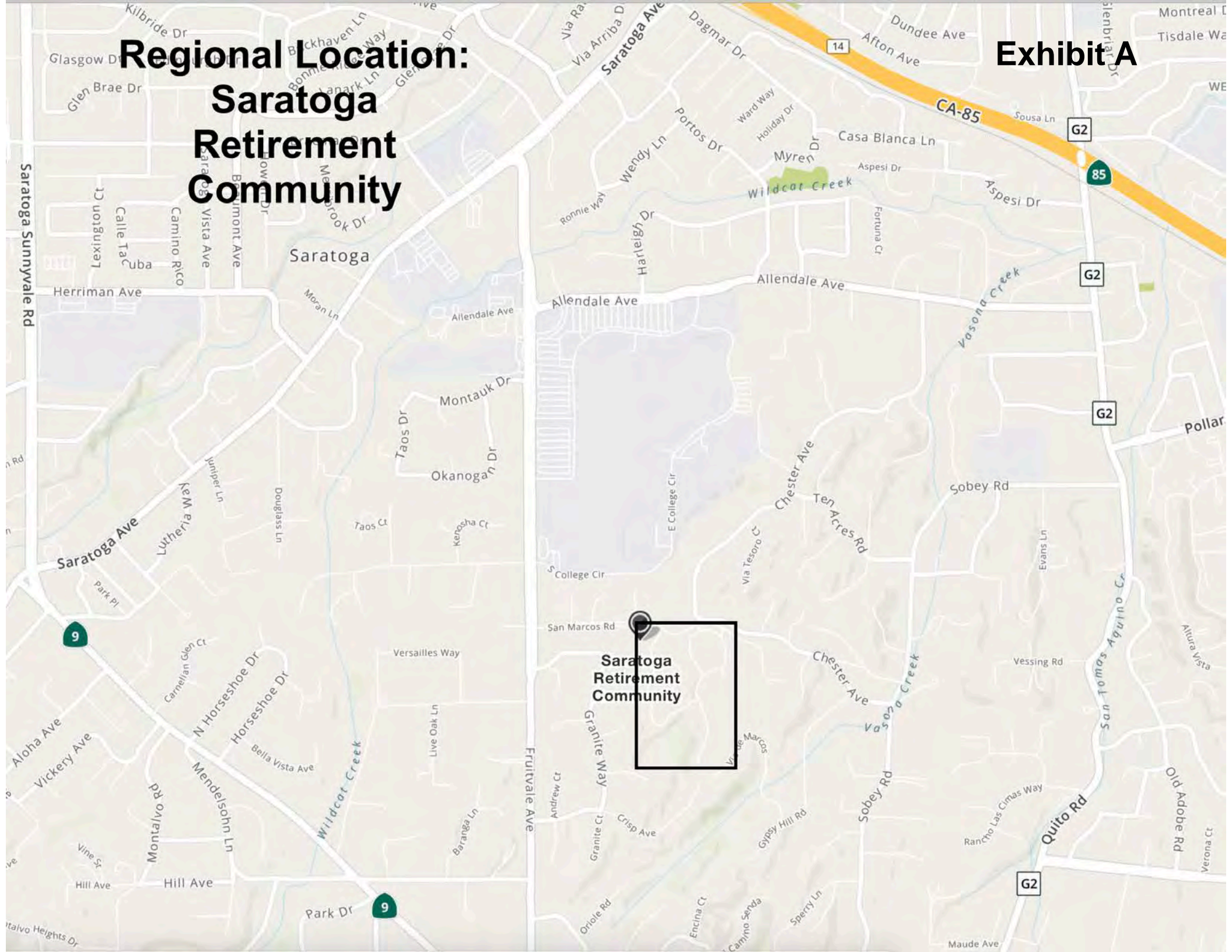
In summary, the Residents' Alternative provides a better alternative to the PRS plan. Use of the Residents' Alternative accomplishes the same growth in Independent Living units as the PRS Plan, but also includes an up to date, right sized Skilled Nursing Facility. It substantially reduces the impact of construction on the current SRC residents, lessens the environmental impact on the historical Odd Fellows rural campus, does not eliminate the Historic Park with its features and accomplishes superior results for SRC future sustainability.

Exhibits for Residents' Alternative Plan

Exhibit	Item
A	Regional Location
B	PRS Proposal Site Plan, showing proposed buildings of particular concern
C	Residents' Alternative Project Location and Site Plan, showing Building C' as a Skilled Nursing Facility and a new Building D
D	Summary Chart of Residents' Alternative plan
E	Parking Tabulation of SRC campus including modified PRS Building C' and new Building D
F	Building C' Elevation view (new Skilled Nursing Facility)
G	Building D Style, Similar to Existing Building 5000 (aka Apt. 2)
H	Building D height relative to Existing Building 4000 (aka Apt 1)
I	Building D height relative to Assisted Living (aka Villa)
J	Neighbors' View of Building D from the South: Via De Marcos
K	Fitness Center Extension, External Views (same as PRS proposal)
L	Front Views of the Historic Manor
M	Odd Fellows Home Historical Park
N	Preserved Trees
O	Comparison of PRS Plan and Residents's Alternative Plan

Regional Location: Saratoga Retirement Community

Exhibit A



Saratoga
Retirement
Community

Exhibit B: PRS Proposal Site Plan and Buildings of Particular Concern


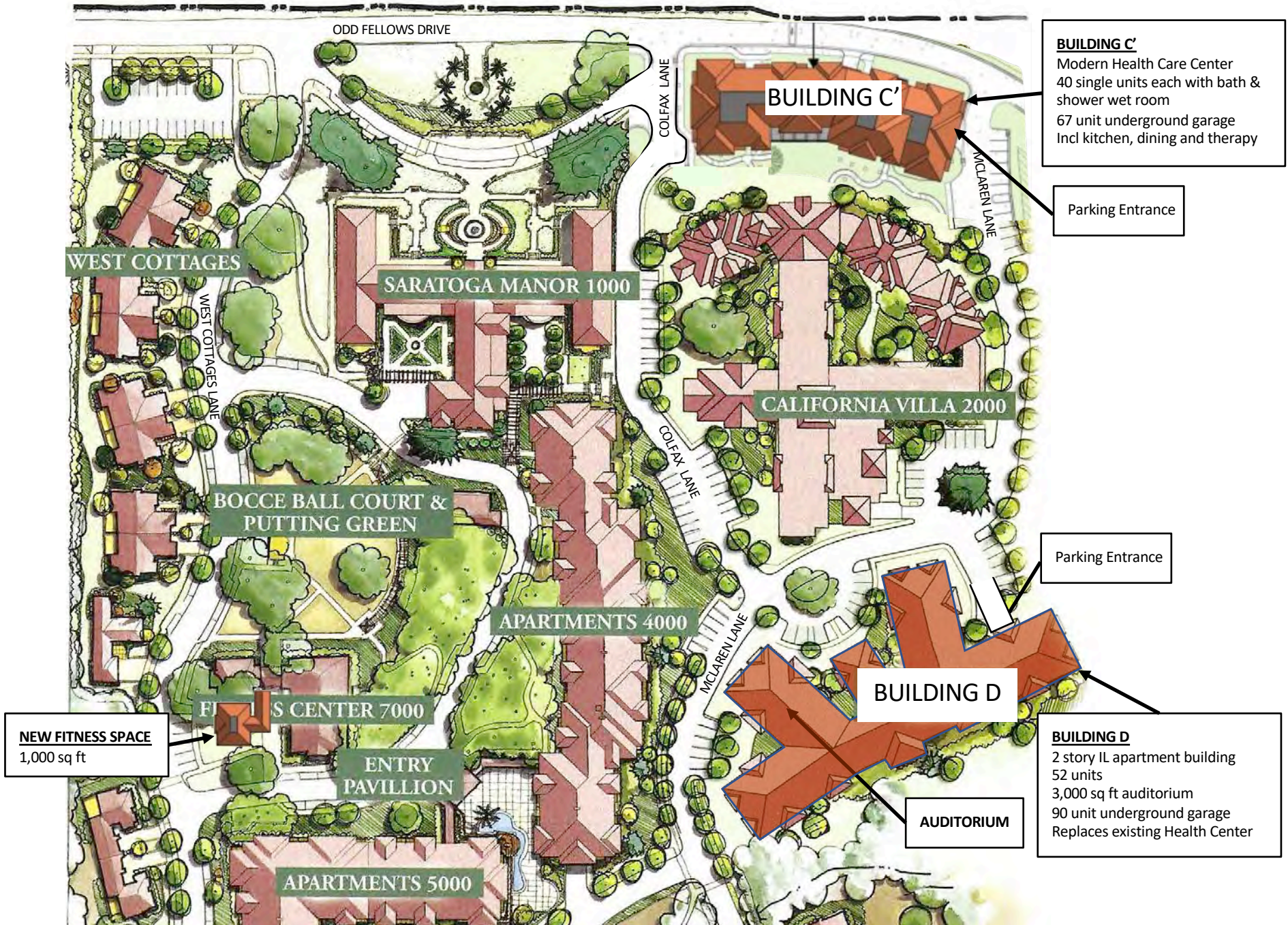
-  shows proposed buildings that we feel destroy the heart of the campus
-  shows a proposed building that impacts nearby trees and is too large



Exhibit C: Residents' Alternative Plan – Project Location and Site Plan



BUILDING C'
 Modern Health Care Center
 40 single units each with bath & shower wet room
 67 unit underground garage
 Incl kitchen, dining and therapy

Parking Entrance

Parking Entrance

BUILDING D
 2 story IL apartment building
 52 units
 3,000 sq ft auditorium
 90 unit underground garage
 Replaces existing Health Center

AUDITORIUM

NEW FITNESS SPACE
 1,000 sq ft

Exhibit D: Summary of Residents' Alternative plan

Alternative plan: Create Building C' and D: This alternative plan will create a reduced capacity but modernized state of the art Skilled Nursing Facility and will increase housing for Independent Living residents. The plan preserves SRC open green space and attractiveness.

Actions	Purpose	Expected length of action	# of units	Square footage	Building height	Comments
Design & Approve Skilled Nursing Facility (SNF) in Building C' and residents/auditorium in Building D	Obtain approvals from City and OSHPD for New SNF	10 months design 8 months permits				Save time/cost by using OSHPD's pre-approved design modules
Develop Building C' as a new Skilled Nursing Facility (SNF)	Provide a right-sized and modernized SNF & rehab. facility					Building C', a new SNF, substitutes for the PRS plan for Building C containing residential apartments
Design and permit 67 parking space underground garage + storage and utilities	Provide needed parking space	12 months	67	33000	10'	2-level basement garage similar to PRS Building C, but reduced to 33000 sq ft from 36342 sq ft
Design & permit Building C' with 40 private patient rooms with bath/shower wet room, + dining room, kitchen, offices, conference room and therapy + 10 surface parking	Provide SRC with a right-sized, modernized SNF and rehab. facility	18 months	40	29271	28' from ground to top floor	2-levels of private patient rooms plus shared facility rooms; exterior similar in appearance to PRS Building C, but shorter in total length and reduced from 31271 sq ft to 29271 sq ft.
Construction phase: Building C' becomes new SNF		30 months construction				
Total time to plan, design and construct Building C' ready for occupation		48 months				
Develop Building D for new apartments and auditorium	Provide 52 new Independent Living apartments & auditorium					This would help satisfy the City of Saratoga RHNA allocation and increase revenue for PRS
Move patients from old Health Care Center [SNF] to new SNF in Bldg. C'	Vacate the old Health Care Center [SNF]	1 month				
Demolish old Health Care Center [SNF]	Make room for the new Independent Living apartments	2 months				Preserve outline of original building's foundation to demarcate footprint of replacement structure
Design and permit 90 space underground parking garage + storage and utilities	Provide needed parking for new residents, visitors and staff	12 months	90	33000	10'	1-level underground garage
Design and permit 2-story structure with 52 apartment units; some units in basement	Add 52 new Independent Living units to SRC campus	18 months	52	79780	28' from ground level to top floor	2-story apartment building with some basement units similar in style to existing Apartment 2 on campus. Building D will be lower height than the current Apartment 1 to the west, and lower than Assisted-Living to the North
Design and permit Auditorium (included in Building D)	Provide for larger meeting room					Auditorium to accommodate growth in SRC population. Located centrally on the campus
Design and construct Build D & Auditorium		30 months				
Total time to plan, design and construct Building D ready for occupation		30 months				Design included in initial plan
Expand Fitness Center	Accommodate population growth	30 months concurrent with Bldg. D		1000	15'	New 1-story fitness class studio connected to existing Fitness Center
Modify Manor to include additional dining area	Needed to accommodate increase in residential population	concurrent with Bldg. D				Internal modification, no permit needed
Design, permit and construct new emergency access	Allow access by Fire Department appliances	12 months concurrent with other development				From Chester Road to Odd Fellows Lane
Finish Building D for new Independent Living units, new auditorium, expanded fitness center, modify manor for extra dining area		30 months construction				Total construction time of 30 months, following demolition of original Health Care Center [SNF]

Exhibit E Parking Tabulation for Residents' Alternative Plan

Parking Tabulation	units	SRC existing parking	existing removed	Alternative Plan proposed parking	net change in parking space	comments
Manor Building	14	0		0	0	
Apartment Building Independent Living 1 (4000)	44	75		75	0	
Apartment Building Independent Living 2 (5000)	46	29		29	0	
Cottage Type 1	26	52 (26 Garage, 26 Visitor)		52 (26 Garage, 26 Visitor)	0	
Cottage Type 2	12	24 (12 Garage, 12 Visitor)		24 (12 Garage, 12 Visitor)	0	
Cottage Type 3	1	2 (1 Garage, 1 Visitor)		2 (1 Garage, 1 Visitor)	0	
Apartment building D including auditorium	52	20 (Surface Parking, including 4 handicap parking)		90 + 20 surface parking (80 garages for residents, 10 garage for meeting)	90	at current Skilled Nursing Facility building
Skilled Nursing Facility (Building C', similar to PRS proposed Building C)	40 private room	0		77 47 structured parking for AL and 20 for SNF garage parking +10 surface parking	77	locate in front of current Assisted Living and Memory Care
Assisted Living and Memory Care		79 (Surface Parking)	50 (Surface Parking)	29 (29 surface parking, additional 47 structural spaces in Building C above)	-50	
Fitness Center		0		0		
On-Site visitor Parking		122 (Surface Parking)	0	122 (Surface Parking)	0	
On-Street Parking adjacent to West Cottages		9 (Surface Parking)	0	9 (Surface Parking)	0	
On-Street Parking adjacent to South Cottages		23 (Surface Parking)		23 (Surface Parking)	0	
Northwest Parking Lot		25 (Surface Parking)		25 (Surface Parking)	0	
TOTAL PARKING		460	50 (removed)	577	117	added 117 parking space for 52 IL units and 40 SNF single room
<p style="text-align: center;">No other on-site street parking is changed. Building C' is in front of AL and Building D is the current SNF location. Net gain 117 parking spaces for 52 IL units in Building D and auditorium, and 40 SNF units in Building C'.</p>						

Exhibit F: Building C', New Skilled Nursing Facility



Exhibit G: Building D Style



Building D has the same style as the existing B5000 (Apt.2):
2-story with basement and underground parking

Exhibit H: Building D height relative to existing Building 4000



East view towards Skilled Nursing Facility, site of proposed 2-story Building D (same footprint). Building 4000 (Apt. 1) is on the left in the foreground. Note the roof top of the 2-story high building D is lower than the 4000 Building.

Exhibit I: Building D height relative to existing Assisted Living Building (aka Villa)



North East view towards Skilled Nursing Facility on the right, site of proposed 2-story Building D (same footprint). Assisted Living Building (aka Villa) is on the left. Note the top of the roof of the 2-story high building D at about the same height as the second level of the Assisted Living Building apartments.

Exhibit J: Neighbors' View of Building D from the South: Via de Marcos

North view from via de Marcos . The tall white building is Assisted Living (Villa), current HCC (future Building D) is between the trees and the Assisted Living

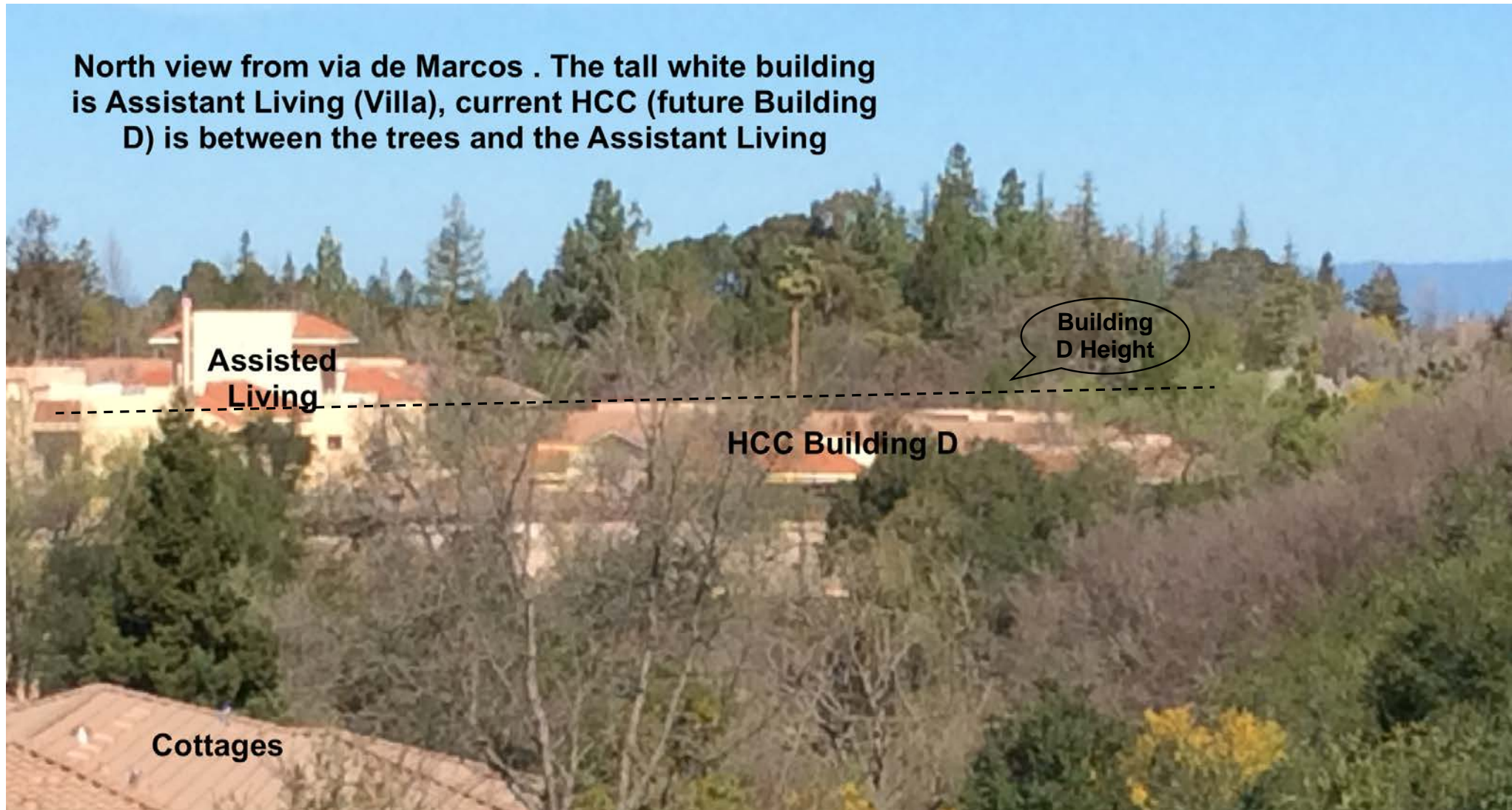


Exhibit K: Fitness Center Extension, External Views (same as PRS proposal)



1 WEST ELEVATION



2 SOUTH ELEVATION



3 NORTH ELEVATION



4 EAST ELEVATION



NOT FOR CONSTRUCTION



SARATOGA CCRC - IL EXPANSION - FITNESS SPACE
 1800 HIGHLAND AVE
 SARATOGA, CA 95070
 PACIFIC ARCHITECTURAL SERVICES

NO.	DATE	DESCRIPTION

STREETSCAPE ELEVATIONS

PROJECT STATUS

DATE: 01/10/2020
 PROJECT NUMBER: 2003317

A3.10-f

Exhibit L: Front Views of the Historic Manor



View from Manor Circle.

This view is preserved in the Residents' Alternate proposal



View from Odd Fellows lane.

This view is preserved in the Residents' Alternate proposal.

Also preserved are the trees in front of the Manor shown in this photograph, plus many trees outside the view of this photograph (see exhibit N).

Exhibit M: Odd Fellows Home Historical Park



The Odd Fellows Home Historical Park is **preserved** in the Residents' Alternate proposal. This important and attractive park occupies a central position on the campus. It includes a bocce ball court, a putting green, a horseshoe court, open spaces for fitness classes, a picnic area with tables, a round sitting area and general areas for residents relaxation. There are a number of trees in and around the park providing shade and adding to the overall ambiance.

Exhibit N: Preserved trees



The campus is graced by a wide variety of trees, new and old. The Residents' Alternative Proposal avoids sacrificing the trees shown in these photographs, amongst others.

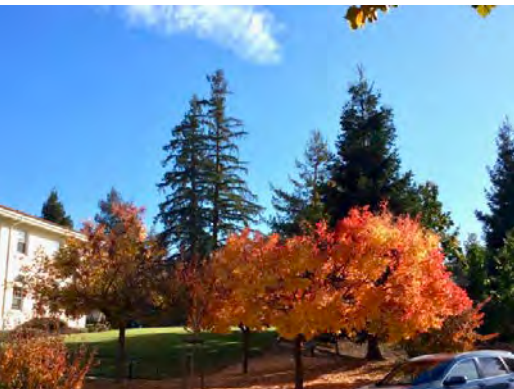
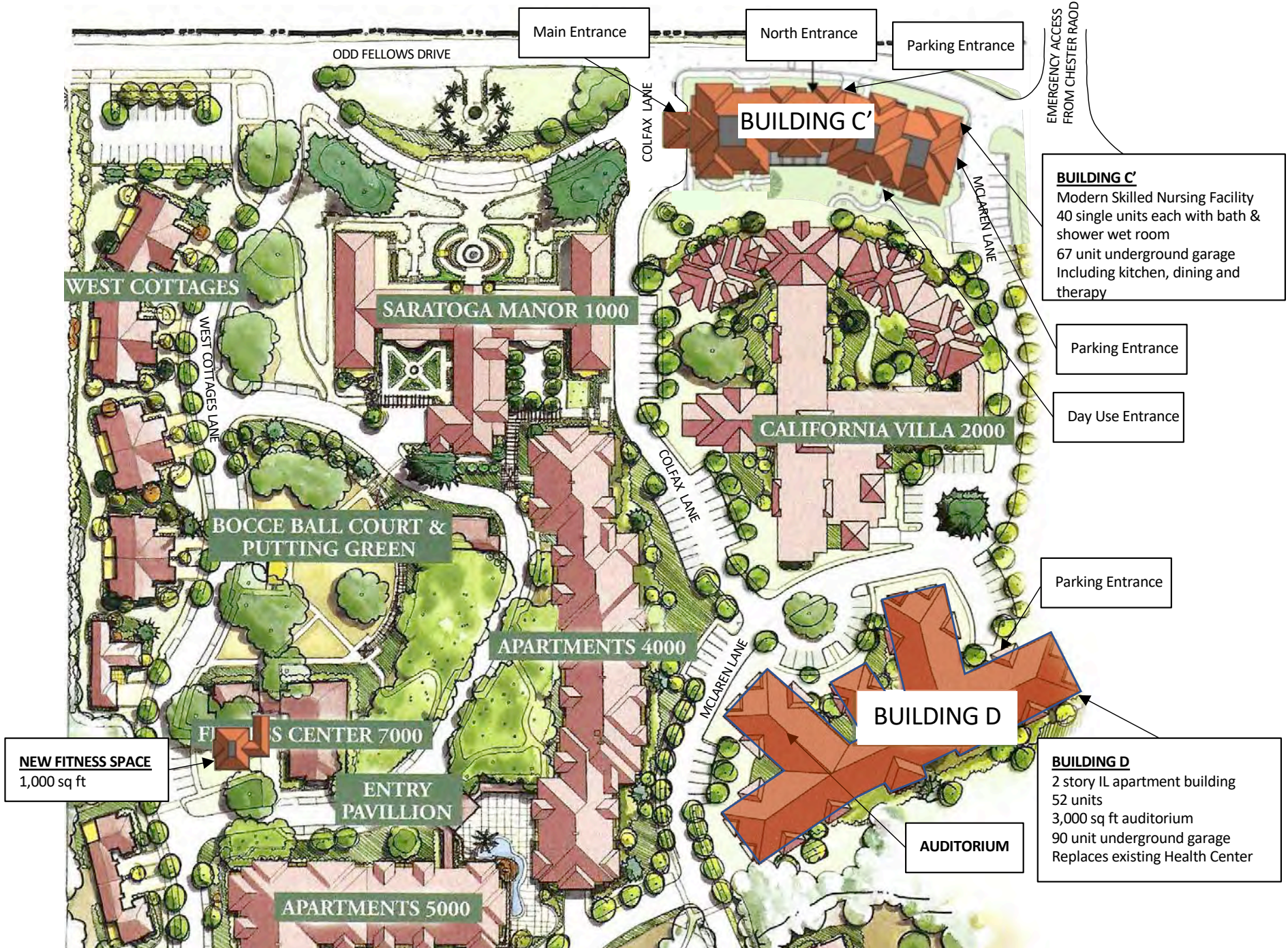


Exhibit O: Comparison of PRS Expansion Plan and Residents' Alternative Plan

Projects Items	PRS Expansion Plan	Residents' Alternative plan
Adding IL apartments	Build 52 IL units by building 3 new buildings, 3 underground garages and Auditorium with underground garage + fitness room	Build 52 IL units, including a new auditorium and one underground garage + fitness room
Skilled Nursing Facility (SNF)	Renovates and reduces from 94 beds to 50 private rooms with showers.	Build one modern state of the art SNF facility with dining room, kitchen and therapy room at an easily accessible location
Permanent Impact on SRC campus		
Green space impact	Occupying all the remaining green space on campus, such as the IOOF Historical Park, the West lawn by the Manor and the front greenery of Manor	No impact
Esthetic impact	Obscure the iconic Historical Odd Fellow Manor listed on the Saratoga City Heritage Resource Inventory	No impact
	Historical park & resident recreation facilities eliminated by a large building; no more open view from the current apartment and cottages	No impact
Trees	60 "protected trees" will be removed permanently	No impact
Traffic congestion	Pavilion Circle loop and West Cottages Lane will have to accommodate traffic from the added cars and cars from added parking garages	Congestion minimized because the buildings are both on the periphery of the campus and have minimum traffic impact on the central campus.
Emergency exit	More difficult to evacuate AL and SNF residents because of 30 to 40 % more IL residents	Because the location of the new SNF is along the main Odd Fellow lane, it is more accessible to evacuate the SNF residents, even though still added 30 to 40 % more IL residents
Parking	Gained 113 spaces for 52 IL units and 50 SNF private rooms	Gained 117 spaces for 52 IL units and 40 SNF private rooms
Impact on Current SRC Residents		
Truckloads of dirt	Extensive excavation necessary for all four underground garages means huge amount of dirt to be hauled away.	Only 60% or less amount of dirt to be hauled away as there is only one building at an already low elevation for the 52 IL units. The new SNF is comparable with Building C but smaller.
Construction length	PRS building B and C, total 30 IL units simultaneously take 30 months. Building A done later has 22 IL units for another 30 months.	Alternative plan Building D total 52 IL units takes 30 months
	PRS renovating 50 rooms over several years disrupts patients for same unknown period. SNF still uses old technology.	Including design, permitting and building new state of the art SNF may take 48 months total
Construction impacted areas	The entire campus will endure construction vehicles, noise, dust, traffic, parking etc.	Mostly in front of Odd Fellows lane, and current HCC location. Building sites easily screened off from rest of campus.
Cost comparison	Construction cost for PRS' 4 buildings (3 IL, 1 Auditorium), 4 underground garages plus SNF renovations is very similar to Alternative plan's 2 buildings: IL building including auditorium, and one new SNF, which uses OSHPD pre-approved modules to cut cost and permit time	

Preserve SRC Alternative Plan – Project Location and Site Plan



BUILDING C'
 Modern Skilled Nursing Facility
 40 single units each with bath & shower wet room
 67 unit underground garage
 Including kitchen, dining and therapy

Parking Entrance

Day Use Entrance

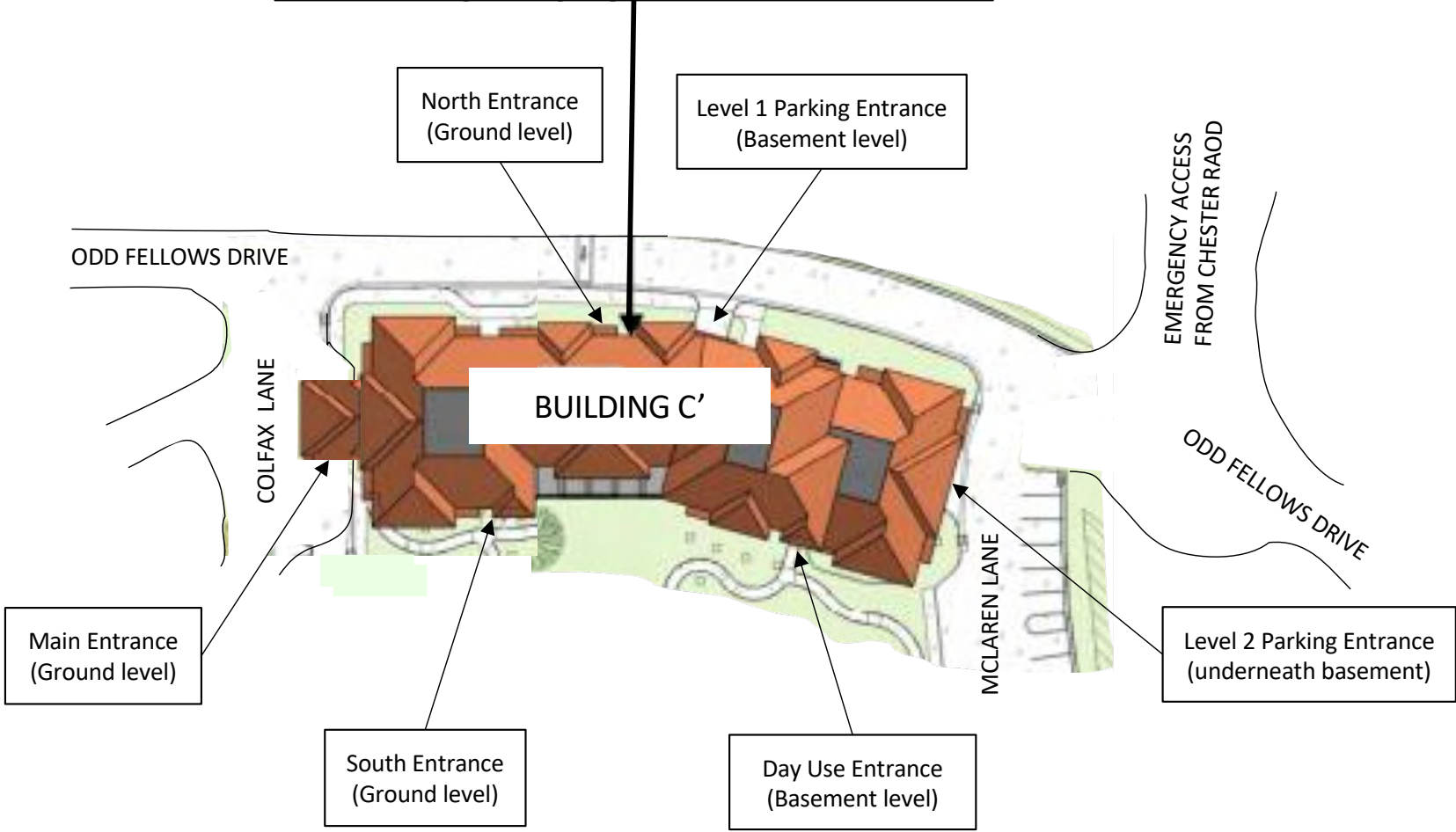
Parking Entrance

BUILDING D
 2 story IL apartment building
 52 units
 3,000 sq ft auditorium
 90 unit underground garage
 Replaces existing Health Center

AUDITORIUM

NEW FITNESS SPACE
 1,000 sq ft

BUILDING C'
Modern Skilled Nursing Facility
40 single units each with bath & shower wet room
Including kitchen, dining and therapy
67 unit underground garage



North Entrance
(Ground level)

Level 1 Parking Entrance
(Basement level)

ODD FELLOWS DRIVE

COLFAX LANE

BUILDING C'

Main Entrance
(Ground level)

South Entrance
(Ground level)

Day Use Entrance
(Basement level)

MCLAREN LANE

EMERGENCY ACCESS
FROM CHESTER RAOD

ODD FELLOWS DRIVE

Level 2 Parking Entrance
(underneath basement)

Skilled Nursing Facility (Building C')

How would you organize the interior of Building C'?

We stated we hadn't designed the interior of Building C' but there are a variety of ways to do it.

Our outline plan for Building C', with units at 350 sq ft each, places 16 units for short term patients (usually rehab out of hospitals) on the top floor and 24 units for long term (residents who first lived in SRC Independent Living, public and Medicaid) on the ground floor.

The full kitchen, 1500 sq ft, is on the ground floor. Each floor has its own patient dining room, approximately 1000 to 2000 sq ft. Food service to the top floor is provided by an installed dumb waiter service.

Therapy areas are on both floors and in the east end basement floor. The therapy on the basement floor has outside access to provide for out-patient care. Each floor has its own nurse's station, medicine room and soiled laundry room.

We include two elevators, plus stairs. Offices, conference room, etc are on either or both floors as well as the east end basement.

We calculate use of about 16,000 sq ft on the ground floor, about 13,000 sq ft on the top floor and 6400 sq ft in the basement. This plan is consistent with our C' sq ft per floor and we still have flexibility in size and choice of spaces.

Wouldn't taking patients in wheelchairs up/down an elevator three times a day for meals be impractical?

Each floor has its own patient dining room and therapy room. There is **no** need to move patients from floor to floor. In addition, most long term patients have meals in their own rooms.

Wouldn't providing skilled nursing on two stories be total inefficiency in staffing, as it would require two nurse's stations?

We have two nurses stations in the current HCC as needed for response times. We believe nurse (Registered Nurse, Certified Nursing Assistant and/or Licensed Vocational Nurse) response times are better served by maintaining nursing stations on each floor.

Wouldn't two dining rooms require extra staff that are hard to find and expensive?

Our proposal integrates a full service kitchen within the Skilled Nursing Facility. This eliminates the delivery of meals from the Assisted Living kitchen. As well as providing freshly cooked, hot meals to the patients, this eliminates the need for meal delivery staff. The four or five wait staff required for 40 patients can readily be allocated between the two dining rooms as needed.

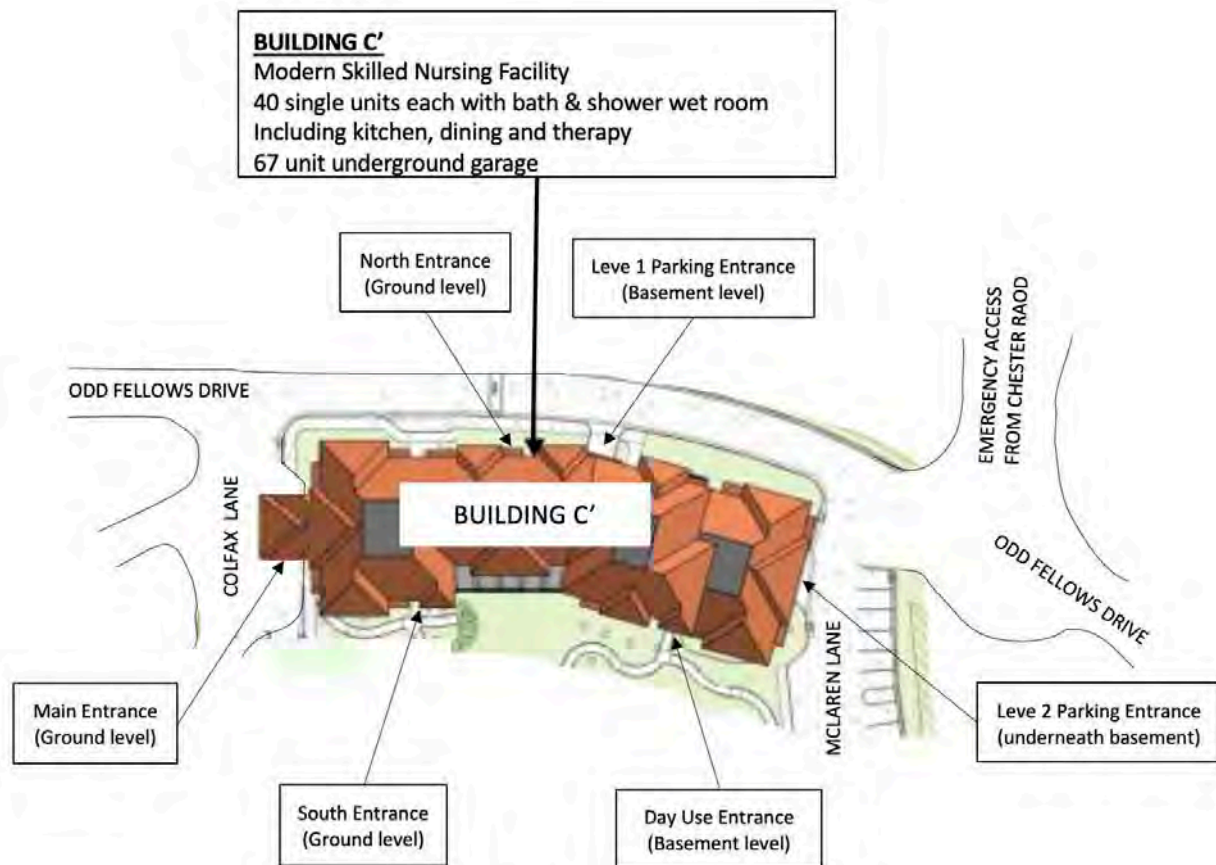
Wouldn't a two-story skilled nursing limit resident access to outdoor space?

Access to outdoor space is available to patients on both floors. Private outdoor space is provided in the same way as for the PRS Building C proposal. Every room has either a private patio on the ground floor where the grade permits, or a private balcony. Care will be taken with guard rails etc to ensure patient safety.

Wouldn't emergency exiting through only the west side of the SNF building be insufficient?

Ground level emergency access/egress is through the Main Entrance at the west end with a covered drive up area and ambulance turning circle on Colfax Lane.

Additional ground level access/egress is provided through the North Entrance on Odd Fellows Drive and the South Entrance. Basement level access/egress is provided through the Day Use Entrance near McLaren Lane and the Level I Parking Entrance on Odd Fellows Drive.



Use of two elevators for evacuating the 16 patients on the top floor will be relatively easy as many short term rehabilitation patients are mobile and they can also exit at ground level via the stairs.

Putting a 40,000 sq ft building into a 15,000 sq ft footprint leads to complications. Are you aware of any Health Care Centers that are multiple stories, and, if so, what is their experience?

An excellent example is the the San Francisco Health Care and Rehab (<http://sfhcr.com>), 1477 Grove St. San Francisco. This facility was ranked as #5 Best Nursing Home in California and #1 in San Francisco by Newsweek based on the Statista data. Normally they have 168 beds, but fewer now because of Covid. They have 2 separate floors for patients on the 2nd and 3rd floors. Physical Therapy and recreation is on first floor, with further Physical Therapy on 2nd floor. There is no dining facility as they bring food to patients in their rooms. There are nurses station on each floor, staffed by CNAs, registered RNs and LVNs. There are 3 elevators and a staircase. During an emergency they use an intercom to evacuate patients efficiently.

Isn't approval for a four story building difficult to obtain?

Describing this building as four story is misleading. The building is treated by the City for approval

purposes as two story plus basement plus underground garage (exactly the same as the PRS proposal for their Building C). As such it is identical to the existing 5,000 building and would not violate the City's two story height limitation, which is likely to be relaxed in any case.

Doesn't OSHPD approval take much longer to approve than the Alternative Plan allows?

The time issue really comes down to design and permitting of the Skilled Nursing Facility. Our understanding of the the PRS claim is it will take 3 years (design and OSHPD permit done in series) where we believe with modern approach to OSHPD it will take 18 months (design and OSHPD permit). We have based our timeline on input from contractors who are active in the business and built OSHPD facilities in California. Our understanding of the PRS timeline is 1 year design, 2 years for OSHPD permit and 2 years for construction, giving 5 years total to get a new SNF. Our plan uses 18 months for design and OSHPD permit and 30 months construction, but adds the 1 year for City approval, also giving 5 years total.

Rawnsley, Emma

From: Cynthia Richardson <crichardson@saratoga.ca.us>
Sent: Monday, December 06, 2021 5:19 PM
To: Rawnsley, Emma
Subject: [EXTERNAL] FW: Transportation consultants' report

For your information.



Cynthia Richardson
Consultant Planner
City of Saratoga | Community Development Department
13777 Fruitvale Avenue | Saratoga, CA 95070
(408) 868-1225 | www.saratoga.ca.us
Office Hours Mondays and Thursdays

From: Tsing Bardin <tsingtb@gmail.com>
Sent: Tuesday, November 30, 2021 10:27 PM
To: Cynthia Richardson <crichardson@saratoga.ca.us>
Cc: Tsing Bardin <tsingtb@gmail.com>; Don Schmidek <dis6933@gmail.com>
Subject: Transportation consultants' report

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Hello Cynthia,

I read the updated Hexagon Transportation Consultants' Transportation Analysis and the Fehr & Peers Peer review. I found many inconsistencies and irrelevant data but many missing **relevant** information in the analyses. If I write comments on this report, is this also going to be included in the EIR draft? If not, how does one comment on the inaccuracies and incompleteness of these reviews?

Thanks again for your help.
Tsing

Rawnsley, Emma

From: Cynthia Richardson <crichardson@saratoga.ca.us>
Sent: Tuesday, December 21, 2021 8:45 AM
To: Rawnsley, Emma
Subject: [EXTERNAL] Fw: Consolidated SRC residents' EIR comments

FYI



Cynthia Richardson | Consultant Planner
City of Saratoga | Community Development Department
13777 Fruitvale Avenue | Saratoga, CA 95070
crichardson@saratoga.ca.us | www.saratoga.ca.us

From: tsing bardin <tsingtb@gmail.com>
Sent: Monday, December 20, 2021 12:00 PM
To: Cynthia Richardson <crichardson@saratoga.ca.us>
Cc: tsing bardin <tsingtb@icloud.com>; Bob Berglund <rbergie@aol.com>; Dick DuBridge <pdubridge@gmail.com>; Michael Griffin <jazzbuff@comcast.net>; Don Schmidek <dis6933@gmail.com>; Tony Vandersteen <anthonyvann@att.net>; Colin Whitby-Strevens <colin@pandcws.com>; PreserveSRC Team <preserve.src@gmail.com>
Subject: Consolidated SRC residents' EIR comments

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Hello Cynthia,

Thank you for coming in this morning to receive the printed version of the Consolidated Responses to Notice of Preparation of EIR. In this document, you will find the responses from many of the Saratoga Retirement Community residents and one written note from Jeffrey Schwartz at San Marcos Rd. There may be more written comments sent directly to you and not included in this submission.

Thank you also for the printed copy of the contract between the City and the Aecom consultants. We just want to be sure that we are not missing anything in our comments to the EIR.

Thanks again for all your help.

On behalf of the many residents, I am sending you by email the Consolidated Responses to NOP of EIR document. Please acknowledge this by email. Many thanks for your help.

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Consolidated SRC EIR Response.pdf
28.8 MB

Have a Happy Holiday and Healthy New Year,

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SRC Residents' Responses to Notice of Preparation of Environmental Impact Report

12/20/2021

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Many Saratoga Retirement Community residents and one nearby, long-time neighbor have responded with comments to the Notice of Preparation of an Environmental Impact Report (EIR) for the SRC Master Plan Update submitted by the Pacific Retirement Services, an out-of-state management company.

Section I: A synopsis of the comments to the topics addressed in the EIR guidelines.

Section II: Our response to the four documents relating to the project:

- A. *Historic Background Report and Review of Proposed Development Plans for the Saratoga Retirement Community* by Urban Programmers, dated 9/6/2020 & Garavaglia Architecture, Memorandum, dated 8/18/2020
- B. *Memorandum from the Hexagon Transportation Consultants on Traffic Study for the Proposed Senior Living Project at 14500 Fruitvale Avenue in Saratoga, California*, dated 6/1/2021 and peer review by Fehr&Peers, dated 7/1/2021
- C. *Arborist Report* by Arbor Resources, dated 5/27/2021 and reviewed by the Saratoga City arborist, dated 6/28/2021.
- D. *Geotechnical Investigation* by TRC, dated 3/11/2020 and *Memorandum* from Cotton, Shires & Associates, City Geotechnical Consultant, dated 6/29/2020

Section III: The original comments in full are included in response to the EIR topics. They are organized into four areas relating to specific topics covered in the EIR.

- A. Trees: relevant to EIR topics: Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emission, Noise & Vibration and Public Services and Recreational Resources
- B. Cultural & Open Space: relevant to EIR topics: Aesthetic, Cultural & Tribal Cultural Resources, Noise and Vibration, and Public Services & Recreational Resources.
- C. Transportation and Traffic: relevant to EIR topics: Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Greenhouse Gas Emission, Hazards, Noise and Vibration, and Traffic
- D. Alternative Plan/General: relevant to most ALL EIR topics: Aesthetic, Air Quality, Biological Resources, Cultural & Tribal Cultural Resources, Geology & Soils, Hazards, Hydrology, Noise and Vibration, and Public Services & Recreational Resources, Traffic and Alternatives

Section 1: Comments to the topics addressed in the EIR guidelines.

Aesthetics

- Views of the Manor Building create an impactful and lasting impression on every visitor and future resident of the Saratoga Retirement Community. Placing multi-story residential Building B directly in front of the Saratoga Heritage Landmark 1912 Manor building forever obscures frontal views of this treasure and even obstructs photographic access.
- Adding the Meeting Room building onto the existing Manor building would ruin the proportions of this building, designed by San Francisco architect Ralph Warren Hart.
- Odd Fellows Historical Park currently represents the only green space within the residential area. Replacing 68 mature trees, many of them currently protected, with the Meeting Room and Building A changes the feel of the entire community from a semi-rural park to a congested urban complex.
- Although the new plan promises to replace removed trees with twice as many new trees in other locations, it will be 25-30 years before the new trees can mature enough to make an aesthetic impact.
- The new Meeting Room building is too close to existing residential buildings and will block light into rooms on the west side of the Manor building.

Air Quality

- Removing the shade and filtering provided by mature trees can increase air pollution, according to a USDA Forest Service article (David J. Nowak, USDA Forest Service, Syracuse, NY *The Effects of Urban Trees on Air Quality*. (https://www.nrs.fs.fed.us/units/urban/local-resources/downloads/Tree_Air_Qual.pdf)
- Several years of construction activities will generate huge amounts of dust, and trucks and construction equipment will emit clouds of exhaust on campus. This can have a health impact on any population, but most SRC residents are elderly and many already suffer from respiratory problems.
- A quantitatively acceptable level of pollutants mentioned here must be described, and how they are controlled and kept within acceptable levels should be specified.

Biological Resources

- The Pacific Retirement Services (PRS) proposal will remove 68 trees, including 46 protected and/or heritage trees, primarily oaks and redwoods, some over 100 years old. These trees

provide habitat for many species of birds and beneficial insects. Newly planted trees will not mature enough to restore habitat to this level for at least 30 years.

- One particular protected tree slated for removal to make way for a new driveway is a very old cork oak (*Quercus suber*). This huge tree (trunk diameter 56") is the nesting place for a large number of woodpeckers, who drill into the soft cork bark to store hundreds of acorns each winter. This natural resource simply cannot be restored if the tree is removed.
- Construction noise and commotion will certainly upset the lives of countless varieties of wildlife that live in or pass through SRC open spaces.

Cultural and Tribal Cultural Resources

- Erecting a building on Odd Fellows Drive in front of the Manor will destroy the view of this imposing historic-listed building. The Meeting Room building will dramatically alter the west view of the Manor. The spatial relationships of this iconic building would be dramatically changed, in direct violation of the US Secretary of the Interior's standards and guidelines for rehabilitation of historic buildings, which state: "*The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationship that characterize a property will be avoided.*"
- The new Meeting Room building will be connected to the Manor by enlarging a current window to make a doorway. The Meeting Room building will completely offset the symmetry and proportions of the original design of the Manor building. See graphic P. 30-31. These changes can be considered violations of the US Secretary of the Interior's standards.
- Replacing the Odd Fellows Historical Park behind the Manor with a two-story building not only takes away precious outdoor recreation space, but it also alters forever the park, which has a spatial and historic relationship to the protected Manor.
- Native American arrowheads and other artifacts have been found on the site.

Energy

- California's Solar Mandate, *Assembly Bill 178 Residential Solar Development Requirements*, "*enforces that solar panels are required on all single-family residences and multi-family residences up to three stories high.*" The PRS expansion proposal fails to include solar panels or any energy-saving construction on any of the proposed buildings.

Geology & Soils

- The City's geotechnical consultants, Cotton, Shires and Associates, Inc. must follow through on their recommendations before construction can be undertaken; pages 2–3 in their

Memorandum dated June 29, 2020, *Supplemental Geotechnical Peer Review (S5159A)* of *The Geotechnical Investigation* by TRC dated March 11, 2020. before and during the construction

- The Memorandum indicates that deep excavation for Buildings B and C shows potential for shallow landsliding and creep of soils. The EIR must determine whether excavation and vibration from drilling could impact the integrity of the Manor building's foundation.
- Over the past 15 years, neighbors directly north of the Manor building have reported drainage problems as a result of runoff from SRC, particularly after heavy rains.
- In the rainy season, foul sewer smells are often evident behind the kitchen at Facility Building 8000, at the corner of Pavilion Circle, possibly related to a covered well said to be nearby. Water table issues should be investigated.
- A study should be done on the effect of digging at the site of Building A on the stability of the swimming pool and the pool building foundation.

Hazards & Hazardous Materials

- SRC residents have no particular knowledge of hazardous material that might be involved during construction but trust those preparing the EIR to address this for them. We do anticipate certain hazardous conditions that are of serious concern, specifically in regard to vehicle and pedestrian traffic during construction.
- Many SRC residents use walking aids such as canes or rolling walkers to get around the campus between buildings or for exercise. Much of the construction proposed by the PRS proposal will cause obstructions and hazards to walkers in the main area of the campus.
- During construction, it is inevitable that sidewalks and driveways will be temporarily obstructed by gates or debris as trucks go in and out during the day. SRC residents are elderly, and it is difficult enough to walk safely in our well-maintained and designed campus, even without added concerns.
- Narrow San Marcos Road serves as the single ingress and egress for San Marcos Road and Friendship Plaza neighbors and for SRC residents, staff, visitors. It is a hazardous road even with current, normal traffic. When heavy truck traffic is added, it could pose significant delays and hazards.
- Proposed building sites are all on or near the main routes in and out of the SRC campus. Any blockage or traffic slowing as a result of parked trucks or temporary storage of materials could cause significant problems if emergency vehicles need access to the SRC campus or if residents need to evacuate quickly.

Hydrology & Water Quality

- Neighbors downhill from SRC have reported runoff drainage problems. The Project's Geotechnical Consultant should survey all underground springs on SRC property and develop a comprehensive, site-wide hydrology plan.
- Comments in Geology & Soils about surface water and possible ground water also apply to this section.

Noise and Vibration

- The impact on SRC residents and San Marcos Rd. neighbors due to traffic and construction noise from trucks, construction equipment, and excavating into bedrock was significant during previous SRC expansion projects. Neighbors were disappointed with the city's response then and will certainly revisit their demands for noise-reduction efforts.
- Virtually all SRC residents and close neighbors who commented were worried about the significant noise of the proposed construction so close to their residences, or even in the same building in the case of Manor residents. The Residents' Alternative Plan for the location of new residential buildings moves much of the noise away from current residential areas and far from neighbors on San Marcos Road.
- Noise and vibration while drilling into bedrock to construct Building B's underground parking garage have not been evaluated. There are concerns that vibrations could impact the Manor building's foundation by the Meeting room building and the new driveway.
- Studies show that removing trees can increase noise levels significantly. (<https://www.fs.usda.gov/nac/assets/documents/agroforestrynotes/an42w05.pdf>) (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3118876/>)

Public Services and Recreational Resources

- The Skilled Nursing Facility (SNF) currently provides outpatient therapy services in addition to inpatient nursing care. The PRS proposal for renovating the SNF fails to include any plan to continue offering outpatient therapy to the community.
- The PRS proposal to convert double-occupancy rooms to private rooms fails to clarify whether single rooms will include private toilets and showers. There is also no mention of enlarging the current physical therapy space, of adding a kitchen in the skilled nursing facility, or of installing a modern air circulation and filtering system following post-COVID codes.

- The PRS proposal plans to continue to offer services during renovations. It is impossible to imagine a patient's successful medical recovery amid the dust, noise, and disruptions of electricity, plumbing, and air filtration systems during construction.
- The current SNF is so out of date that it will not serve the public well. The alternative proposal by SRC residents addresses all of the concerns with the PRS proposal.
- *The Historic Background Report and Review of Proposed Development at SRC* states that the proposed site of Building A replaces "a seldom used landscape and recreational area," referring to the Odd Fellows Historical Park. The park is the only central place where residents and visitors can sit in the sun or enjoy the shade from the large redwood and oak trees and the view of the east foothills of San Jose. Residents assemble to play bocce ball and socialize or simply to get out of their apartments. The park is used by SRC residents, neighbors, employees, and contractors. It is to SRC what Central Park is to a New Yorker. There is no other flat area available to replace this park.
- The PRS proposal claims that the putting green and bocce ball court currently in the Odd Fellows Historical Park will be relocated, but there is no visible plan for a new putting green, and the proposed bocce ball court is only half as long as the current one.
- The Odd Fellows Historical Park currently provides a shaded place for residents to sit, and it is often used for picnics. The new plan fails to show where picnic tables will be relocated, and there will no longer be a central place with significant shade.
- The PRS proposal claims that new construction reduces open space from 37% to 31%. However, the remaining 31% is inaccessible for walking or outdoor recreation; it comprises the creek bed and a gully too steep and unsafe for walking. Construction of Buildings A, B, and the Meeting Room leaves SRC with no usable open space at all.

Transportation/Traffic

- During construction, most of the parking areas on campus will be torn up, leaving staff, residents, and construction workers with no place to park. Parking along Fruitvale Avenue, San Marcos Rd., or Chester Avenue will disrupt neighborhood traffic and create severe safety issues. After construction, although the PRS proposal adds 113 new parking spaces for additional residents and staff for the 52 new Independent Living units, this does not include parking for visitors or public users of the Meeting Room. The Residents' Alternative Plan includes more parking spaces.
- The PRS proposal requires that four streets be relocated and/or reconnected, with several intersections added. This will substantially impact traffic during construction, and West

Cottages Lane will forever become an unsafe and congested traffic hazard. The impact of these changes must be studied.

- Traffic and construction impact during renovation of the current Skilled Nursing Facility (SNF) building has not been evaluated, particularly the impact on transporting hot meals across McLaren Lane three times daily from the Assisted Living building to the SNF building.
- See the Residents' *Responses to the Hexagon Transportation Consultants Report* in Section II B. for detailed concerns about transportation and traffic issues.

Alternatives

The following summarizes the Saratoga Retirement Community's *Residents' Alternative Plan*:

The City of Saratoga's current General Plan calls for a small-town, residential character, and the Saratoga Retirement Community (SRC) fits this description. Although SRC residents realize that housing demands will bring changes to Saratoga, we feel that the proposed Pacific Retirement Services (PRS) plan would destroy the current small-town dynamic of SRC.

The PRS proposal is out of line with Saratoga's General Plan, proposing construction of four massive buildings and underground garages to achieve an increase of 52 Independent Living units. The PRS proposal calls for destroying the Odd Fellows Historical Park and the residents' outdoor recreation facilities. It also encircles and crowds the classic, historic IOOF Manor building, obscuring the view of this iconic structure to the point that it will no longer be the dominant, crowning structure on campus.

The PRS proposal also requires removal of more than 60 trees, many of them protected redwoods, oaks, and palms. Removing these trees destroys the gracious, environmentally friendly SRC campus that originally drew most current residents to move to SRC.

The real proof of the negative impact of the PRS proposal will be demonstrated when PRS is required to erect the Saratoga city-mandated story poles to represent the actual size and volume of their proposed buildings.

Out of frustration with failed attempts to have a meaningful dialog on alternatives with the PRS management company, a group of SRC residents prepared and submitted to the City of Saratoga an alternative plan, the Residents' Alternative Plan, for inclusion and consideration in the Environmental Impact Review (EIR) process. This alternative plan provides an environmentally superior solution that satisfies the project's basic objectives.

The Residents' Alternative Plan produces the same number of new Independent Living units, 52, as the PRS proposal. However, the alternative plan accomplishes the same growth

objectives through the removal, and replacement of a single existing building, the current outdated and oversized Skilled Nursing Facility (SNF).

The new building in the alternative plan includes 52 new Independent Living units, an underground parking garage, and an auditorium. Prior to removing the existing skilled Nursing Facility building, a new, state-of-the-art, modern Skilled Nursing Facility and underground garage will be constructed on the same site as Building C in the PRS proposal, but the alternative building is smaller and avoids significant environmental impacts on large, protected trees. This location is also adjacent to the proposed new emergency access to Chester Avenue and would provide improved evacuation access for residents and Skilled Nursing Facility patients, if needed.

The Residents' Alternative Plan avoids destroying the Odd Fellows Historical Park, 68 trees, and residents' recreation facilities. Views, proportions, and structural integrity of the historic IOOF (Independent Order of Odd Fellows) Manor building are left intact.

In accordance with the California Environmental Quality Act (CEQA), we expect that the EIR will recognize that the Residents' Alternative Plan as an environmentally superior alternative, based on the number and degree of associated positive environmental impacts.

For more information on the Residents' Alternative Plan, also known as the Preserve SRC Plan or Preserve Plan, visit PreserveSRCCampus.org.

Cumulative Impacts

- When considering cumulative impacts of the proposed project and foreseeable future projects in the area, SRC residents request a thorough review of impacts caused by the requirements of the City of Saratoga's state-mandated growth plans at Fellowship Plaza.
- Previous comments in the **Transportation/Traffic and Air Quality** sections also apply to **Cumulative Impacts**.

Growth-Inducing Impacts

- Unless all proposals are rejected, some growth is unavoidable. Assuming some growth, SRC residents are concerned about the impact of increased traffic on emergency responses and evacuation and on air quality (see comments to **Traffic** and **Air Quality** topics).
- Other concerns include impacts on 1) sewer and waste water disposal systems, 2) general impact of water shortages on residents as well as community services and 3) wildfire hazards.

Comments to the EIR and all other reports included in this document are joint efforts from the following contributors:

Tsing Bardin	Dick DuBridge	Don Schmidek
Marilyn Basham	Pat DuBridge	Jeffrey Schwartz
Bob Berglund	Michael Griffin	Nathan Silverman
John Brittain	Marilyn Manies	Anthony Vandersteen
Mary Carroll	Brenda Niemand	Beverly Wallace
Del Coates	Edmond Pelta	Colin Whitby-Strevens

Saratoga High School *Falcon Newsletter* December 3, 2021:

<https://saratogafalcon.org/content/senior-and-local-residents-advocate-for-an-alternative-to-the-proposed-construction-at-the-saratoga-retirement-community/>

Section II: Responses to four documents relating to the project:

A. Responses to Historic Background Report

"Historic Background Report and Review of Proposed Development Plans for the Saratoga Retirement Community" by Urban Programmers of San Jose, and its peer review by Garavaglia Architecture, were underwritten by Pacific Retirement Services (PRS) to support their expansion proposal. The following comments in disagreement with the report are made by residents of the Saratoga Retirement Community (SRC).

Re: the statement on p. 32: *"The area to the southwest of the Manor Building has been minimally used for outdoor recreation with paths and benches and a putting green."*

Re: the statement on p. 35: *"Building A... replacing a **seldom** used landscape and recreational area of the property."*

Both statements above are false. Currently, Odd Fellows Historical Park is used regularly by residents—playing bocce ball games, strolling on the lovely open ground, enjoying picnics with families under the oak trees, etc. It is the *only* outdoor recreational facility on campus.

Re: the statement on p. 33: *"... the dominant setting of the historic Manor on the top of the knoll ... is visually accessible on the campus."*

In fact, the current view from the road directly in front of the Manor (appearing on all SRC promotional materials) will be completely blocked by the new two-story Building B. The only way to see the front of the Manor will be from the driveway, and it will no longer be possible to step back far enough to see or photograph the entire facade. Furthermore, the Manor will have a large Meeting Room building attached to it via a 27-foot causeway, totally changing the iconic image of the manor. See graphics on pages 30-31

Re: the statement on p. 36: *"The historic building will continue to be visually accessible from the campus entry on Odd Fellows Drive, and from the proposed Building C."*

This is false; one will be *unable* to see the front view of the Manor from Odd Fellows Drive after Building B is built. It will completely block the front view of the Manor (see composite image of new building blocking view below).

Re: the statement on p. 43: *"The new building will connect to the historic building on the west facade through an existing window opening that is approximately 4 feet wide. The connection will remove a minor amount of wall to widen the opening to approximately 6 feet 4 inches and below the window to create the door height."*

This is in conflict with the Project Description, which states *"the Meeting Room addition would be attached to the west side of the Manor building at its existing doorway."* There is

no existing doorway at the level where the causeway is attached to the Manor. In fact, what the Historic Background report describes is changing a window into a door. In our opinion this changes the physical structure of the historic heritage building—in direct violation of the Secretary of the Interior’s standards that require minimal change to a building's distinctive materials, features, spaces and spatial relationships.

Re: the statement on p. 43: *“The first floor of the proposed meeting room aligns with the first floor of the Manor, and the parking level aligns with the basement of the historic building where an existing door will remain.”*

It is not clear how the parking garage is connected to the Manor building.

Re: the statement on p. 44: *“The (Meeting Room) building steps into the hillside for the parking level. Although the rendering appears to have the Meeting Room be taller than the Manor this is not the case. The eave line and roof are below that of the Manor.”*

We believe that even though the eave line and roof are below that of the Manor, the large Meeting Room Building will block the west view of the Manor when arriving on the campus and when driving along West Cottages Lane. The West Cottages Lane neighbors will look at this monstrous Meeting Room building instead of the beautiful trees currently in the space. Aesthetically, this appendage is an affront to the Manor and its spacious surroundings.

Re: the statement on p. 51: Summary of findings: *“The proposed development to expand the Saratoga Retirement Community with 3 new residential buildings, a Meeting Room Building and a Fitness Center complies with the California Environmental Quality Act ...”*

We strongly disagree because of all the above findings.



Composite image of new building B blocking the Manor view

B. Responses to Hexagon Transportation Consultants Report

The *Memorandum from the Hexagon Transportation Consultants on Traffic Study for the Proposed Senior Living Project at 145000 Fruitvale Avenue in Saratoga, California* dated June 1, 2021 and the Fehr & Peers peer review dated July 1, 2021 are both irrelevant and erroneous. Detailed comments by residents of the Saratoga Retirement Community provided here are divided into two categories: **The Big Picture** and **Detailed Comments on the Traffic Study**.

I. The Big Picture

A. Impact on Residents *During Construction*

- The impact of construction traffic, noise, and air quality on the daily lives of residents and neighbors was not evaluated. Dust, noise, and air pollution generated by exporting 28,600 cubic yards of excavated dirt (i.e., more than 6,000 trips of 10-cubic-yard capacity dump trucks), cement mixer trucks, bulldozers, cranes, and other construction equipment over a period of several years was not evaluated. The real health and safety hazards to the elderly residents walking and living here must be evaluated. A quantitatively acceptable level of these pollutions must be described, and how they will be controlled and kept within acceptable levels should be specified.
- The impact to Manor residents from noise and vibration while drilling into the bedrock in constructing Building B and its two-level underground parking garage was not evaluated.
- Parking during construction was not evaluated for construction workers, residents, or staff. Because most parking areas will be torn up, construction workers, staff, and residents will have no place to park. Parking along Fruitvale Avenue, San Marcos Rd., or Chester Avenue will disrupt neighborhood traffic and create severe safety issues. The projected construction process of one building after another in sequence will last for many years, and parking will be a problem throughout this long construction period.
- Traffic generated by construction vehicles on already congested roads, particularly along Fruitvale, Saratoga Avenue, and Highway 9 during school pick up/drop off times and West Valley College class changes must be thoroughly studied. Current studies are invalid because they did not include construction traffic during pertinent peak hours.
- Internal traffic up to Fruitvale Avenue and including traffic from Friendship Plaza should be studied, particularly during Saratoga Retirement Community (SRC) peak traffic hours between 2:45 and 4:00 pm.

- The traffic on San Marcos Road, the *only* access road to SRC and its San Marcos Road neighbors, will be increased substantially, especially during the multi-year construction process. This needs thorough evaluation. The compromised safety issue has not been studied.
- It is unclear which areas are designated for storing construction materials and tools at each construction site. No doubt construction material storage will further reduce the areas available for parking and will impact traffic.
- The Pacific Retirement Services (PRS) proposal requires that four streets be relocated and/or reconnected, with several intersections added (note: this is not required in the Residents' Alternative Plan). Multiple street relocations and four added street connections will have a huge impact during the many years of construction and will ever after pose a serious hazard to West Cottages Lane. Resident vehicle and foot traffic will be at great risk, and construction will be immensely disruptive and dangerous. The internal accesses and internal traffic on campus, during and after the construction, must be carefully studied.
- Construction impact during remodeling of the current Skilled Nursing Facility (SNF) is not mentioned or evaluated. The project description states, "*and the number of skilled nursing beds within the Health Care building would be reduced from 94 to 52 (i.e., a reduction of 42 skilled nursing beds). The number of memory care and skilled nursing beds is proposed to be reduced due to conversion of semi-private double-occupancy rooms to private single-occupancy rooms.*" How will this conversion be achieved? What is the impact on inpatients trying to recuperate? The residents will be subjected to noise, dust, and major disruptions of electrical, plumbing, and air filtration systems for several years. The impact on their recovery must be evaluated. It almost seems like *elder abuse* to force vulnerable patients to endure disruption and hazardous air quality during a medical recovery.
- The following proposed intersections raise concerns about potential major traffic and safety hazards (numbers refer to those on the illustration included below):
 1. The intersection of West Cottages Lane and Odd Fellows Drive. The PRS proposal moves the intersection a number of yards west and removes the large trees. During the reconstruction of this intersection, all vehicles, trucks, semis, food delivery vehicles, private cars, and construction equipment must circulate around the campus, up steep Eucalyptus Drive and around Pavilion Circle because it will be impossible turn right at the current stop sign at West Cottages Lane.
 2. The relocation of the new Manor Circle Lane. This will connect to West Cottages Lane several yards uphill and is a major traffic impediment that poses a hazard to residents and traffic.

3. The garage entry to the Meeting Room Building on the Manor's west side. This entry/exit is also within feet of the street above that has a blind curve.



4. The two intersections on West Cottages Lane from the new semicircular driveway in front of Building A.

5. The intersection of the new Manor Circle and Colfax Lane, and relocation of the intersection of Colfax Lane and Odd Fellows Drive.

6. The realignment of Colfax Lane. Although straightening Colfax Lane would provide more space for Building C, it would remove two large protected trees. (Note that the Residents' Alternative Plan does not require this Colfax Lane realignment.)

7. The location of the garage entry to Building A. This entry is at the busy junction of the receiving dock, the traffic on Pavilion Circle, the entry and exit for the Meeting Room garage, and the relocation of the street to the Manor. It would be a traffic nightmare during construction.

B. Impact on Residents *After* Construction

- There will be a real traffic problem at the junction of Pavilion Loop and West Cottages Lane, near the current loading dock (near intersections 3 and 7 in the illustration above). Within this small area across from the loading dock is the future underground garage entrance for Building A, the pedestrian walk from the meeting building to building A, and the parking garage entrance to the Meeting Room building on West Cottages Lane. This junction is just waiting for accidents to happen; it is simply too congested and unsafe.
- Traffic access to and from the campus is through *one narrow* lane, Odd Fellows Drive. This poses a real traffic bottleneck, particularly when staff changes shift. All traffic from campus converges to Odd Fellows Drive at only three points: the intersections at West Cottages Lane, at Colfax Avenue, and at McLaren Lane. This includes cars from South Cottages Lane, Buildings 4000 and 5000 garages, West Cottages Lane, cars parked in the Pavilion circle, staff cars parked along West Cottages Lane, and cars parked in the Building A garage (about 31 parking spaces) as well as garbage, delivery, and services trucks. Vehicles also come from East Odd fellows Drive (including new Buildings B and C, Assisted Living, and Friendship Plaza.) A thorough study must be made to estimate whether narrow Odd Fellows Drive has the capacity for normal usage, much less traffic at peak times.
- All the recommended stop signs at the various junctions from Odd Fellows Drive to West Cottages Lane, Colfax Lane, and McClaren Lane will further slow evacuation traffic.

C. Emergency/Evacuation:

- The traffic study fails to include emergency evacuation. The proposal includes a new fire truck exit at Chester Avenue to Odd Fellows Drive. So far there is only one exit for regular cars from Odd Fellows Drive to Fruitvale Avenue and another emergency-only exit for cars to Chester Avenue. In case of emergency, with ambulances and fire trucks coming to our campus, how do regular cars safely get out? No study is provided to show how many residents can be evacuated in such an event. Odd Fellows Drive has stop signs at both Colfax Lane and West Cottages Lane intersections. How long would it take to evacuate the 260 plus Independent residents and 300 plus staff, not to mention the ambulance trips for Skilled Nursing Facility patients and Assisted Living residents, most of whom do not drive?
- Emergency evacuation is totally inadequate, even for current residents. San Marcos Road is the sole entrance/exit for SRC residents and staff, for San Marcos residents, and for adjacent Fellowship Plaza residents. New buildings will bring in at least 75 more residents and 75 staff. No plan exists for this addition. This must be addressed.

II. Comments on Traffic Study by Hexagon Transportation Consultants

- Peak traffic flow was measured at 7–9 AM and 4–6 PM; however, peak hours at the SRC campus and when the school is in session are between 2:45 and 4 PM. West Valley College has peak traffic throughout the day when classes change. During these peak hours, traffic on Fruitvale Ave. is extremely congested, much worse than reported in your study (pages 1 and 4). The study results are irrelevant because of inaccurate peak hours.
- The theoretical Poisson distribution model used is inadequate because at peak hours, all the cars are there at the same time.
- The Poisson distribution also fails to work for emergencies. In these cases, the Theory of Constraints model, in which the speed or the rate of cars is determined by the slowest bottleneck, is more applicable. For example, in case of emergency such as earthquake or fire, all cars on campus would need to evacuate to a safe place. The rate of vehicle movement would be determined by speed over the bumps (2–4 mph), backing up cars on the streets that have stop signs at Odd Fellows Drive. In addition, cars exiting from San Marcos often fail to stop at the Odd Fellows Drive roundabout!
- Re: statement on p. 1: “*There are no approved or under-construction projects within the project vicinity.*” Traffic studies should be made while there is construction in this area. Recently there were quite a few construction projects along Fruitvale Avenue from Allendale to Burgundy Lane. One could see dump trucks and cement trucks blocking the road. This was for just one or two houses. Imagine the impact of construction for five buildings at the Saratoga Retirement Community campus!
- Also re: p. 1: The amount of increased traffic should include both the increased number of residents and the increased workforce, as there will be a 50% increase in both numbers. The traffic study does not reflect these increases, instead estimating fewer than 100 net peak-hour trips. What is the basis for this?
- Re: statement on p. 17: “*Vehicular access to the site is provided by four main driveways.*” To clarify, all four driveways share one incoming lane, Odd Fellows Drive, a narrow, two-lane road with traffic bumps. Access to the site after the new construction will be very congested, particularly at the junction of Pavilion Circle and West Cottages Lane, where entry to the new Meeting Room building and the entrance to the Building A underground parking garage meet. This junction is already a problem because it is heavily used by big delivery trucks, garbage trucks, and pick-up trucks all day at the receiving dock. The entrance to the Building A underground garage directly across from the receiving dock on Pavilion Circle is most unsafe. When the new Meeting Room building is complete, there will be additional pedestrian traffic, posing a real hazard. The traffic report does not address this issue. Because Odd Fellows Drive is a public easement, there will be more pedestrians walking

along it in front of Buildings B and C. Both buildings have parking entrances from the road, increasing the risk for elderly pedestrians, even when walking on the sidewalks.

- On p. 17:, the report describes all added stop signs at each of the main access roads, but it gives no estimate of evacuation time if each car must stop at the stop sign when there are more than 150 cars trying to get out to Fruitvale Avenue. It would pose a major traffic jam and unsafe evacuation.
- Re: statement on p. 21: "*The total number of employees working on the campus is 294 with a potential future reduction of 6 employees working in the Skilled Nursing Building, which will reduce the total number of employees to 288.*" This is inaccurate accounting and fails to include the 75 additional Independent Living residents and 75 more employees.
- Re: statement on p. 21: "*The employees typically arrive and leave outside commute peak hours.*" Why is peak traffic measurement not done during SRC employee commuting hours? The current measured peak periods of traffic time are irrelevant, erroneous, and misleading. A realistic calculation and model are required
- Re: p. 8: Vehicle queuing data is invalid as it was not collected at peak times when school discharges or when West Valley College classes change.
- Re: p. 10: Trip generation during project: An estimated 28,600 cubic yards of dirt will be exported from the construction site. This means 2,860 10-cubic-yard truck loads and about 6,000 trips of 10-cubic yard trucks on the streets near the campus. Add trips by cement trucks to that. Saratoga Avenue, Highway 9, and Highway 85 will be congested. The traffic report is irrelevant when they use the Senior Adult Housing data. We are talking about *major* construction lasting several years.
- Re: p. 21: Loading zones: The receiving dock behind the Manor is constantly busy location, with large garbage trucks, large food delivery trucks, and smaller delivery and dumpster trucks all day long. It is false to say "*do not receive recurrent deliveries for goods by truck,*" as stated in the report. Truck deliveries occur every day, and they need loading spaces. Traffic problems will be exacerbated by the new underground garage entrances and the pedestrian walk from the Meeting Room building to Building A as well as by cars traveling on Pavilion Circle. All this added traffic and congestion will make the junction very dangerous for both cars and people.

C. Comments to the Arborist Report by Arbor Resources, dated 5/27/2021 and report by the City Arborist dated 6/28/2021.

We notice that there seems to be a correlation between the suitability of preservation rating of certain trees and their locations.

We observe in the Arbor Resources report that trees in the building sites tend to be rated as Moderate or Low suitability for preservation, while those not in building sites are rated as high.

For instance, on page 2:, the Arbor Resources report rated tree #10: "Coast redwood, overall condition good and is high suitability for preservation," while tree #11: "Coast redwood, overall condition fair and is moderate suitability for preservation." This conclusion is contrary to the observation of the city arborist, at an in-person, on-site visit on Sept. 8, 2021, that there is no difference in the health of these two redwood trees: both are healthy and should be in the high suitability rating for preservation.

As we see it, the only difference between the two is their location: #10 in front of the Manor will not be removed, but #11, in the path of a new driveway in the PRS proposal, has to be removed. We object that the trees in the way of a building site, seem to be rated as less healthy. The Residents' Alternative Plan preserves all 68 trees, including 45 protected trees.

Similar discrepancies in rating are found for many other trees in the Arbor Resource report.

The City arborist did confirm that, because of the drought and many years of negligence from SRC management, the redwood and oak trees are not as healthy as they should be, but they all have long potential life spans and do not deserve to be removed just because they are in proposed building sites.

Re: p. 1 of the *Arborist Report*, the Pacific Retirement Services proposal will remove 148 trees, some of them over 100 years old and more than 50 inches in diameter. The PRS proposal replaces twice as many trees, but the new trees would be much smaller and immature. In our opinion, it is totally inadequate to replace the majestic redwoods and oaks with young, small trees. It would be decades before the lost bird habitat and shade could be restored.

Re: p. 14 of the report, concerning relocation of redwood trees #67 and #73, both healthy with 12–in trunk diameters, and a large valley oak #133. There is no plan in the PRS proposal for relocating these large and healthy trees. Where would their new homes be, given that there is no more green space after the new buildings are up? What is the health impact of moving these large, healthy trees? Redwoods have a shallow but incredibly expansive root system necessary for keeping such tall trees erect—can they even be moved without killing them? A thorough study for the relocation of these trees should be investigated and followed through.

Re: p. 15-22:, section 6, there are plenty of details about how to protect the remaining trees, and we would like to have assurance that the plan is thoroughly followed and that the City will ensure due inspection before, during, and after the construction process.

We feel that trees are important assets—research shows they have direct influence on air quality, on moderating temperature and other microclimate effects, and on energy effects on buildings (David J. Nowak USDA Forest Service, Syracuse, NY *The Effects of Urban Trees on Air Quality* https://www.nrs.fs.fed.us/units/urban/local-resources/downloads/Tree_Air_Qual.pdf)

Trees are also habitat for many nesting birds and a big factor of preserving the aesthetic value of the SRC campus. We strongly oppose replacing these majestic trees with buildings.

Current front view of the Manor with trees



Residents' alternative plan does NOT remove any of these large protected trees.



Saratoga cherishes its canopy of old growth trees. The PRS SRC expansion plan will remove 68 trees which are mostly large redwoods and oaks: 45 of them are "protected trees" meaning that they are large trees that are more than 12 inches in diameter. All of these trees are being removed because the PRS plan eliminates the park by adding Building A, Building B in front of the Manor and a new Manor auditorium. None of these trees would be removed with the alternate proposal created by and supported by a large majority of IL residents.

See PreserveSRCcampus.org website.

D. Comments to the *Geotechnical Investigation* by TRC, dated 3/11/2020 and *Memorandum* from Cotton, Shires & Associates, City Geotechnical Consultant, dated 6/29/2020.

The project geotechnical consultant must follow through the recommendations in the "Supplemental Geotechnical Peer Review" (S5159A). We are particularly concerned about the historical Manor building foundations due to the proximity of the new driveway and the massive excavation near the Manor. A thorough geological and soil analysis is a necessity to insure that cracks and instability will not harm this treasure.

More details see Geology & Soils topic

Section III. Supporting Material and Letters

Many SRC residents submitted comments relating to topics covered by the EIR, and these comments are included here in their entire, original form. Comments are separated into four groups relating to specific EIR topics: A. **Trees**, B. **Cultural & Open Space**, C. **Transportation/Traffic**, and D. **Alternative Plan/General**.

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A. Trees

Category A is directly pertinent to EIR topics **Aesthetic, Air Quality, Biological Resources, Greenhouse Gas Emission, Noise and Vibration, and Public Services & Recreational Resources.**

1. Comments on Arborist Report –Tsing Bardin, Marilyn Basham et.al

We notice that there seems to be a correlation between a tree's health state and its location.

We observe in the Arbor Resources report, the trees in the building sites tend to be rated as Moderate or Low suitability for preservation. Those not in the sites, are rated as high. For instance, redwood trees #10:and #11 both near the east side of Manor building. #10 is rated High and #11 Moderate suitability for preservation. This conclusion is contrary to the observation by the city arborist in-person on-site visit on Sept. 8, 2021. There is no difference in the health states of these two redwood trees: both are healthy and should be in the high suitability for preservation. As we see the only difference between the two is their locations. #10 in front of the Manor and will not be removed, while #11 will be in the new driveway path in the PRS proposal, so it has to be removed. However, we object that the trees in the way of a building site, seem to be rated as less healthy. The Alternative plan will preserve all 68 trees, of those 45 are protected trees. Similar discrepancies in rating are found for many other trees in the Arbor Resource report.

Indeed as confirmed by the City arborist, because of the drought and the many years of negligence from the SRC management, the redwood and the oak trees are not as healthy as they should be, but they do not deserve to be removed, just because they are in the building sites.

These majestic old trees are home to many species of birds. There are hundreds of acorns studded in the cork oak, wood peckers hammering, owls hooting on top of trees, small birds chirping and birds nesting in the branches. Even though the campus is in the middle of Saratoga, because of these trees, one does feel connected with nature and enjoys the biological resources. These trees are aesthetically pleasing, providing irreplaceable scenic quality. We need to protect them!

Trees are important assets, they have direct influence on air quality, on moderating temperature and other microclimate effects and energy effect on buildings, as researchers have shown.

2. Saratoga Trees by John Brittain, Ph.D December 2, 2021

Saratoga is a Tree City

There are signs placed on roads entering our city which advertise Saratoga to be a Tree City. The signs declare “Saratoga Proudly a Tree City USA” and also states that has been for 12 years.

Using Google, the word “trees” was entered on the Saratoga website and it came back with 521 results. Obviously, trees are important to Saratoga, its residents, and to our culture.

Again, from the Saratoga website, “All trees are protected, regardless of species, if they have a trunk diameter of 10 inches or more” end quote.

Trees and the PRS Proposed Buildings

The PRS plan includes erecting buildings A and B, and a new Meeting Room. Erecting these buildings will cause 68 trees to be removed; 45 of these trees are protected trees which have a trunk diameter of 10 inches or more. Some of the protected trees, which would be removed, are over 6 feet in diameter, over 100 feet tall, and are over 100 years old. The residents’ alternative plan would not remove any of these trees. To repeat that; the residents’ alternative plan would not remove any of these trees.

PRS has told the city that they will replace the total number of removed trees with double that number. After thinking about it, the replacement doesn’t come close to adequately replacing the trees. What will be the height and diameter of the replaced trees? What will be the age of the trees? How can PRS possibly replace a 100-year-old tree, a tree with a diameter of over 6 feet, a mature fully grown tree?

The three buildings in the PRS proposal, previously mentioned, are to be built on what is now either green space or open space. With the removal of the green space and open space there will be little space available for the replacement trees to be planted.

The Effects of Urban Trees on Air Quality

David J. Nowak, USDA Forest Service, Syracuse, NY wrote an article titled, “The Effects of Urban Trees on Air Quality. The first paragraph states:

“Urban vegetation can directly and indirectly affect local and regional air quality by altering the urban atmospheric environment. The four main ways that urban trees affect air quality are:

- Temperature reduction and other microclimatic effects
- Removal of air pollution
- Emission of volatile organic compounds and tree maintenance emissions
- Energy effects on buildings”

Replacing mature trees with small, young trees will adversely affect the air quality, according to the above article, for the Saratoga Retirement Community and for Saratoga.

Conclusion

Removal of 68 trees, 45 of them being protected mature trees, and replacing them with smaller trees is absolutely alarming when there is an alternative plan that provides the same number of housing apartments and protects the 68 trees and our air quality. The residents’ alternative plan needs to be seriously considered to protect these trees in Saratoga, a Tree City.

3. The Effect of Urban Trees on Air Quality and Climate Change

The Effects of Urban Trees on Air Quality

David J. Nowak, USDA Forest Service, Syracuse, NY wrote an article titled, "The Effects of Urban Trees on Air Quality". The first paragraph states:

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Replacing mature trees with small, young trees will adversely affect the air quality, according to the above article, for the Saratoga Retirement Community and for Saratoga.

Landscape Trees and Climate Change

From the Utah University, Forestry Extension, Michael Kuhns, Extension Forestry Specialist wrote an article titled, "Landscape Trees and Climate Change."

"The theory behind climate change or global warming is that increasing greenhouse gases are causing a general warming over the earth that is affecting global climate." "To reduce carbon dioxide buildup and its effects on climate change, we can either reduce carbon dioxide emissions (mainly burn less fossil fuels), or we can reabsorb carbon dioxide from the air. Trees enter the picture here because they can be used to take carbon dioxide out of the air. All plants make food out of carbon dioxide from the air, water, and solar energy through the process of photosynthesis. This food is then used to make most of the body of the plant, including roots, leaves, stem or trunk, and flowers and fruit."

"In the hottest part of the summer about half of the electricity used in the U.S. powers air conditioners, and air conditioning causes power plant emissions of 100 million tons of carbon dioxide (27 million tons of carbon) each year. Trees planted to shade building and cool the air through transpiration can reduce this energy use by up to 70%. Well-placed trees that slow the wind can reduce energy use for heating by 30%. Trees in living snowfences reduce the energy needed to plow roads and parking lots. These are just some of the ways that trees can be used to reduce energy use, thereby reducing fossil fuel use and carbon dioxide emissions."

Replacing mature trees with small, young trees will mean significantly less carbon dioxide will be removed from the air and therefore do considerably less to contain climate change.

Conclusion

Trees are extremely important in our lives. They obviously provide great aesthetic value in or lives in many different ways. But trees also play a huge part in preserving our air quality and to fight against climate change. The resident's alternate plan would not remove any of these trees. The resident's alternative plan should be given serious considered.

4. Trees on Aesthetics and Air Quality/Greenhouse Gas Emission

As a recent resident of the Saratoga Retirement Community (SRC), I am writing to express my concern over the expansion program proposed by Pacific Retirement Services (PRS) and ask that you seriously consider the alternate proposal by the residents of SRC.

Saratoga proudly calls itself "The City of Trees" and as a 38-year homeowner in this city, I have experienced firsthand how the city has protected the trees within its boundaries. Yet, now before the city council is a plan by PRS to remove more than 60 trees as part of the SRC expansion for buildings A, B and the meeting room, 45 of these trees being protected. An alternative plan put forth by the residents would save all of these trees and still allow for the building of 52 new housing units.

AESTHETICS

Trees on the SRC campus contribute greatly to the aesthetics, peace and tranquility for seniors who have left their previous houses and have chosen to live there. All SRC residents live in 1 or 2 bedroom homes, most having moved from much larger dwellings and spacious yards. In choosing SRC, they were drawn to the beauty, shade, ambiance, and open spaces of the campus and object to their rural setting being denuded of mature trees and replaced by multi-story buildings. Yes, PRS plans to replace the uprooted trees with 240 new trees, but they can never in the lifetime of these residents replace the current ones, some of which are over 100 years old.

AIR QUALITY/GREENHOUSE GAS EMISSIONS

These valuable trees absorb carbon dioxide, taking carbon out the the air while providing oxygen, filtering the air and offering a buffer to noise. They provide coolness at a time of extreme global warming. In addition, they are landmarks and a great source of pride to this historic setting.

We encourage you to visit our campus and see for yourself what a benefit these trees are. Please seriously consider the resident's alternative proposal.

Sincerely,

Marilyn Manies

5. Bird list

On the SRC Campus we have spotted many species of birds. Removing the trees means removing their habitats, including both birds and other wild life. Life here would then be like living in an urban apartment environment. Residents here are strongly against it.

There are at least 37 species of birds spotted on the SRC campus.

1. Great Blue Heron
2. Canada Goose
3. Mourning Dove
4. Anna's Hummingbird
5. Rock Dove
6. Turkey Vulture
7. Cooper's Hawk
8. Red-shouldered Hawk
9. Red-tailed Hawk
10. Acorn Woodpecker – breeding in the Cork Oak Tree across from the Manor
11. Hairy Woodpecker
12. Northern Flicker
13. Black Phoebe
14. California Scrub-Jay
15. American Crow
16. Chestnut-backed Chickadee
17. Bushtit
18. Oak Titmouse
19. Violet-green Swallow
20. Wrenit
21. Ruby-crowned Kinglet
22. European Starling
23. Owls – heard, uncertain which species
24. American Robin
25. House Finch
26. Purple Finch
27. Lesser Goldfinch
28. American Goldfinch
29. Dark-eyed Junco
30. Song Sparrow
31. White-crowned Sparrow
32. Golden-crowned Sparrow
33. California Towhee
34. Spotted Towhee
35. Bullock's Oriole
36. Yellow-rumped Warbler
37. Palm Warbler

6. Trees on Greenhouse Gases, Air Quality, and Climate Change

Hello. My husband, Del Coates, and I are SRC residents. We both oppose the PRS expansion plan. Tonight we ask you to thoroughly examine and weigh the unnecessary damage the ill-conceived PRS plan would inflict on the environment by needlessly polluting the air and increasing greenhouse gases contributing to climate change.

Please keep in mind that both the PRS plan and the more thoughtful Preserve plan would result in 52 additional apartments, a new auditorium, and a modern health center. But the Preserve plan is far more efficient and environmentally benign.

The Preserve plan produces the added apartments, the new auditorium, and the modern health center without erecting three superfluous buildings—PRS Buildings A and B and a separate auditorium. Three fewer buildings consume less energy in producing building materials, transporting the materials to the site, and then constructing the buildings. In addition to saving energy, three fewer buildings reduce related air and water pollution.

Long term, the loss of our mature trees may be even more consequential in terms of additional tons of air pollution and increased climate change.

In order to erect its 3 unnecessary buildings, the PRS plan would remove 68 more trees than would the Preserve plan—68 more trees. Forty-five of those trees are “protected.” Their trunk diameter is 10 inches or more. Some are over 6 feet in diameter, over 100 feet tall, and more than 100 years old

Trees capture carbon dioxide and sequester it in their woody stems and roots. Importantly, large-stature trees with dense wood store far more carbon than do small, young trees. In addition, one study found that large trees annually removed about 70 times more air pollution in the form of ozone, sulfur dioxide, and other gases, than did small trees.

It's not reasonable to argue that planting small, young trees—even twice as many—would compensate for cutting down our 68 existing mature trees.

Thank you,
Mary E. Carroll. Ph.D.
Del Coates, Ph.D.
14500 Fruitvale Ave, apt 5323
Saratoga, CA 95070
408-741-7525

B. Cultural & Open Space

Category B is directly pertinent to EIR topics on **Aesthetic, Cultural & Tribal Cultural Resources, Noise and Vibration, Public Services and Recreational Resources and Transportation/Traffic.**

1. Manor Building Is Threatened—Brenda Niemand

As a relatively new resident at the Saratoga Retirement Community, I have many serious concerns about the proposed expansion project on our campus. On my first visit to this community, I was smitten with the iconic Manor building—its premier situation crowning the hill, its bell towers and loggia making a nod to California's Spanish heritage. This handsome white manse, conveying a sense of elegance, welcome, and security, was the perfect centerpiece for the gracious campus it anchors.

Cultural and Tribal Cultural Resources

Among many troubling issues with the PRC plan for enlarging the facility, the threat to this original, historical building is the most alarming. This treasured piece of Saratoga history demands protection from the proposed depredations.

The Secretary of the Interior's Standards for historic preservation item No. 2 notes:

The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationship that characterize a property will be avoided.

Building a large building immediately in front of the Manor will completely obscure any view of it from Odd Fellows Road. One will no longer be able to take in the sweeping frontal view that has long welcomed visitors and residents. The fact that the new building would not be as tall as the Manor is irrelevant, since from the road, passersby will be looking uphill with a 2-story structure blocking the view; the tops of the bell towers *may* be visible. The beloved historical Manor house will no longer greet the public; they will need to hunt for it.

And that's not all. Attaching a freestanding wing to the Manor to house a meeting room/auditorium would destroy its classic symmetry. This awkward appendage can be seen only as an encroachment on the Manor and an insult to its gravitas; now this building, with its two strong arms, would have a third one dangling inexplicably from the western wing.

The granting of a historic building designation must recognize the importance of the "spatial relationship" between structure and surroundings—the way a building is placed on its site for aesthetic effect as well as functionality. In all the changes to this property over the years, the builders have been careful never to disrespect the jewel in the crown. Until now.

Noise and Vibration

Current residents will of course resent the noise, dirt, and inconvenience of any on-site construction, but pity the poor residents of the Manor. They would contend not only with construction of the building (B) directly in front of the Manor and the Meeting Room being attached to its west side, but also with the proposed residential building (A) in the Historic Park, directly behind the Manor. Whether this occurs sequentially or simultaneously, is it even bearable?

NOTE: The alternative plan would obviate all of these problems.

2. Impact on Historic Manor building and Spaces—Tsing Bardin, Ph.D

When you first drive into the campus you will see the impressive white Mission Revival style Manor building with its two towers. The Manor was built in 1912 and is listed in the California Register of Historical Resources. It is visible from areas of Saratoga far from the property, and many Saratogans believe it to be the single most iconic structure in the city.



Current view of the Manor

The Project Description itself is wrong: “Building B would be constructed within the parking lot north of the Manor building.” This is incorrect. Building B and the new driveway will stand directly in front of the Manor, not within the parking lot; They are constructed far beyond the current parking lot north of the Manor building. They replace the elegant green space with cement driveway and a two-story building; their placement will destroy the spatial relationships enjoyed by the Manor and its surroundings; and they require the removal of protected trees. Building B will obscure the magnificent setting of the Manor and the front view of that building. This is in direct violation of the Secretary of the Interior’s standards that require “minimal change to its distinctive materials, features, spaces and spatial relationships.”

It is a Saratoga Heritage landmark site listed in the City’s Heritage resource inventory. As such the City of Saratoga has the responsibility through the EIR to investigate the potential for instability of the building’s foundation due to the proximity of building the new driveway, the massive excavation in the front and dramatic unearthing of the site adjacent to the west of the building. A thorough geological and soil analysis is a necessity to insure that cracks and instability will not harm this treasure.



Front (north) view of Building B from Odd Fellows Drive. Building B will completely obscure the dramatic front view of the Manor (in this photo, Building B is superimposed for effect.) Only the towers of the Manor can be seen above the roof of Building B.

Now let us see what the Meeting Room Building does to the Manor. This photo shows the current west view of the Manor:

Proposed site of Meeting Room Building



The proposed Meeting Room Building encroaches on the west side of the Manor, eating up its open space and destroying its setting—plus, this addition requires the removal of even more protected trees. The Meeting Room Building will be connected to the Manor via a 27-foot-long causeway through a converted Manor window. This construction will require a structural alteration to the historic Manor itself.



Meeting Room Rendering

Even though the Meeting Room's eave line and roof are below that of the Manor, the Manor west view will be blocked by the large two-story, above-grade building and its garage. The West Cottages Lane neighbors will look at a monstrous building instead of beautiful trees. Aesthetically, it ruins the Manor's symmetry and spoils its uncrowded setting.

Building A is to be constructed behind the Manor, where it will eliminate most of the historic Odd Fellows Memorial Park, which is also a major part of the historical grounds and settings surrounding the Manor.

Combined, these three buildings do great damage to the view and setting of the Manor, require a structural change to the magnificent Manor, eliminate the surrounding historical grounds, and remove 45 protected trees. They also eradicate most of the beloved park at the heart of the campus; many elderly residents use, rely on and cherish the park as the major area for enjoying open space and outdoor recreation.

In contrast, the Residents' Alternative Plan offers the same number of 52 new apartments, but it will not construct any of these buildings, and therefore has no impact on the historic Manor or the Odd Fellows Memorial Park. The Residents' Alternative plan does a substantially better job of maintaining the gracious setting, tranquility, outdoor recreation and safety of the campus that most residents valued highly when they chose to move here.

Tsing Bardin Ph.D.

14500 Fruitvale Ave. Apt. 5320, Saratoga CA tsingtb@gmail.com, 408-741-1478

C. Transportation/Traffic

Category C is directly pertinent to EIR topics on **Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emission, Hazards, Noise and Vibration, Recreation Resources, and Transportation and Traffic.**

1. Quantity of Dirt Hauled away by Construction

This following table from the PRS proposal shows the estimated amount of dirt to be cut, filled and exported in order to construct Buildings A, B C and Meeting Room Building and the corresponding 4 underground garages.

The total amount of dirt to be exported is 28,580 cubic yards. This is to say, about 2860 10-cubic yards of truck loads. The round trip amounts to about 6000 10-cubic yard truck trips. This would impact the traffic on all the local streets, the highways and the internal traffic at SRC. The air pollution, the traffic and the noise and vibration from these trucks transporting the dirt should be evaluated.

There is almost 2000 cubic yards of dirt to be relocated for fill. Most of that will be moved on site and will add to the traffic hazards, dirt, noise and vibration even though it won't be trucked through the community. Traffic, air pollution, noise and vibration caused by locally moving the dirt on campus within the community should be evaluated.

Looking at the depth of excavation particularly under Building B and the Meeting Building, both in the proximity of the Manor. The impact on the Manor building's foundation must be investigated.

EARTHWORK QUANTITIES					MAX. DEPTH/HEIGHT OF CUT & FILL	
	CUT (CUBIC YARDS)	FILL (CUBIC YARDS)	EXPORT (CUBIC YARDS)	IMPORT (CUBIC YARDS)	DEPTH (FEET)	HEIGHT (FEET)
BUILDING A	8400	270	8130	0	16	6.5
BUILDING B	14200	590	13610	0	21	4.5
BUILDING C	6980	600	6380	0	25	9
MEETING BUILDING	550	430	120	0	8.5	6
FITNESS BUILDING	170	0	170	0	2.5	0
EVA @ CHESTER AVE	170	0	170	0	5.5	0
<p>NOTE: EARTHWORK QUANTITIES SHOWN ARE APPROXIMATE. IT SHALL BE THE CONTRACTOR'S RESPONSIBILITY TO INDEPENDENTLY ESTIMATE QUANTITIES FOR HIS/HER OWN USE.</p>						

2. Oral Comments Made on 11/16 at the Community Meeting by Vandersteen

My name is Anthony Vandersteen, and I am a member of SRC. The expansion planned by our management company PRS will cause a major upheaval to quality of life on the main campus, which could last several years. First of all the entrance way along San Marcos road (our only way in), and leading into the campus at the corner of Odd Fellows drive and West Cottages Lane, will be *totally congested*. This corner will be at the junction of two major building sites, Bld B, in front of the manor, and the Meeting Hall on the west side of Barnes Hall. Earth-moving vehicles will be removing tons of earth from this area, and will be constantly blocking the entrance way. It can be confidently projected to be a major traffic jam for much of the day for many months, with Excavators, Backhoe loaders, Bull dozers, Graders and Trenchers, constantly going in and out of that corner, at the entrance into our 'peaceful home' which we all chose for our 'tranquil retirement'.

For two or three years, Odd Fellows drive in front of the historic Manor will be a construction site of large vehicles, all, competing with the usual traffic. The first impression that new visitors and potential residents will see when they enter SRC will be a construction zone. Usual parking will be completely disrupted as construction workers will use every available place to park, which already constantly happens to residential parking areas throughout the campus, particularly in front of the pavilion area. It will be impossible to shield these building sites because all traffic has to continuously drive through this area. The major upheaval which welcomes potentially new residents will have a very damaging effect on residential growth during this time, and significant revenue loss can be anticipated.

The Residents' Alternative plan is planned to be on the east boundary of the campus and is therefore off of the major campus routes, and will have far less traffic. Also the new building D will be situated at the lowest point on campus, and therefore be much less of an eyesore during construction, which is particularly of interest to our neighbors. Also both Bld C and D, in the Residents' Alternative design, can easily be shielded during construction to mitigate dust, dirt and noise from passing to the rest of the campus. In the construction trauma alone the Residents' Alternative design is far superior to the PRS design. I have only dealt with the initial construction phase. The construction upheaval in the park area when Bld A is built, will hugely affect this area right in the center of campus, and will make life extremely miserable for residents, all around this construction zone.

Presented orally on 11/16 Community meeting by Anthony Vandersteen

D. Alternative Plan/General

Category D is directly pertinent to EIR topics on **Alternatives** and general comments to **Aesthetic, Air Quality, Biological Resources, Cultural & Tribal Cultural Resources, Geology & Soils, Hazards, Greenhouse Gas Emission, Hydrology, Noise and Vibration, Public Services & Recreational Resources and Traffic**

The Residents' Alternative Plan is also known as Preserve SRC plan or Preserve Plan.

1. Letter from Bob Berglund

My wife and I have been Saratoga residents since 1969 and when we sold our home in 2014 we chose to stay in Saratoga and move to the Saratoga Retirement Community (SRC) because of its rural campus and its compatibility with the Saratoga Community, proudly a Tree City USA.

Saratoga's current General Plan calls for Saratoga to have a small town residential character and the Saratoga Retirement Community (SRC) fits this definition. Yes, we realize that housing demands will bring changes to Saratoga but that does not have to change the desire to retain as much of a residential character as possible.

The current SRC expansion project submitted by an out of state management company is out of line with Saratoga's planning as it relies on four massive buildings and underground garages to accomplish the increase of 52 Independent Living units. This results in destroying the IOOF (International Order of Odd Fellows) Historic Park and its resident recreation facilities and encircling the historic IOOF Manor Building so this iconic building can no longer be distinguished. It also requires removal of over 100 trees, many of them large protected redwoods, oaks and palms.

In the spirit of compromise SRC residents have proposed a number of alternatives over the past two years only to have them rejected out of hand. Out of frustration with our attempts to have a meaningful dialog on alternatives with the management company, a group of residents prepared and submitted an alternative plan to the City Planning for inclusion and consideration in the Environmental Impact Review (EIR) process. This alternative produces the same number of new Independent Living units, 52, through removal and rebuilding of a single existing building, the current out dated Skilled Nursing Facility (SNF). This plan also provides for a new state of the art, modern SNF, with an underground garage. This plan is accomplished without destroying the IOOF Historical Park or obscuring the stately, iconic Historical Manor. The alternative plan also avoids destroying most of the protected trees.

We would be pleased to have our neighbors, interested Saratogans, City Planners and Council Members visit the Saratoga Retirement Community campus to fully appreciate its current beauty and site layout and to understand the damage and destruction the current expansion project entails. See PreserveSRCCampus.org website and Contact info@preservesrccampus.org to arrange a tour of the campus.

2. Letter from Dick DuBridge

I have been a resident of Saratoga for 56 years. My children and grandchildren have gone to the Saratoga schools and graduated from Saratoga High School. I know and love this community just like all of you residents. I oppose and urge you to oppose this PRS plan to transform SRC into a barren, urban ghetto.

PRS, the out of state developer, plans to add living units to the site. In doing so, they plan to clear cut all heritage trees on the interior of the site, eliminate the historic central park and erect buildings at the front, side and back of the iconic twin bell tower manor obstructing its view.

Preserve SRC campus has developed a detailed alternate plan which would add the same number of living units, preserve all of the heritage trees, preserve the central park and preserve the views of the manor.

We do not need the PRS destructive plan to build additional housing units. There is a better way.

I urge you to visit the PreserveSRCcampus.org website for more information and oppose this horrendous PRS plan.

3. Letter from Pat DuBridge

In 1965, my husband and I and our two pre-school children moved to Saratoga. We loved the small town village, the good schools, and especially the open spaces and the cherished green canopy of native oaks and redwoods. I put down deep roots in this lovely community supporting the fine schools, Montalvo and the Foothill Club. We traveled the world over the years, but it was always a pleasure to return home to Saratoga.

When the time came to move from our house with many stairs and a big garden, we chose Saratoga Retirement Community. I am very happy here. A perfect cottage just over the fence at the end of Chablis Ct, a lovely open park across the street with a Bocce court, picnic tables, horseshoes and a putting green. I look out my windows and see stately heritage trees – many nearly 100 years old, indeed, a unique and lovely place.

PRS, our management company based in Medford, Oregon has an expansion plan that entails building three new large buildings and a big new auditorium attached to the side of the historic Manor building. These buildings would eliminate the park, destroy 66 trees and block the view of the iconic, historic Manor. The majority of residents do not want this plan. A group of residents has put forth a well thought out, professional alternate plan that proposes a new, state of the art Health Center and a new 52 unit apartment building that would also include a large auditorium on the site of the old, outmoded health center site. This plan would give us everything our management company proposes and save our trees and our recreational park.

About 30% of our residents are from Saratoga and, like them, you too may some day choose to move to Saratoga Retirement Community. We want you and future generations to experience the same tranquil, open space place that we live in today. We need your help to make this happen. We need you to email the Saratoga City Council and Planning Commission. We need you to support our PRESERVE SRC ALTERNATE PLAN by attending open hearings at the city. Please help us keep our Saratoga Retirement Community beautiful and green.

For more information see PreserveSRCcampus.org website.

4. Letter from Edmond R. Pelta

Edmond R. Pelta
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December 15, 2021

Cynthia Richardson
City of Saratoga, planing department,

I will start by stating that as a professional consulting engineer who has spent a long career assisting various corporations in project leading to making money for their stockholders, I have no objection in corporations such as PRS pursuing that goal for their stockholders, and for the Odd Fellows. I don't believe that making money is a bad motive. That said, I feel that the proposed project has serious flaws and exceeds what I would consider to be the normal standard of corporate ethics. What is being proposed, may not be illegal, but it is certainly a breach of good faith relative to the residents of SRC which were lured into a relationship with SRC based on certain understandings which PRS now proposes to violate.

The project is presented to the city of Saratoga as a way of fulfilling it's requirement to provide additional housing. I would suggest that in the case of the proposed expansion plan, this is largely an illusion. Yes the expansion would provide 52 apartments but these would be devoted to very up-scale retired individuals or couples. I would suggest that there is no great shortage of units of this type in this geographical area. At the same time, one could expect that the expansion would add about 50 more employees (based on present ratios) who would need housing but could not afford to live near here.

The construction involved in the PRS plan would build on almost every square foot of the accessible open space that has been a major attraction of SRC and has contributed to making it a desired neighbor for those Saratoga residents living around the parameter of SRC.

I, and many other residents are essentially prisoners of PRS. I have a substantial investment, buy in, that I can not afford to abandon. Additionally, I am too old to contemplate moving again. I moved to SRC because of the spacious and attractive nature of the facility. The construction involved would, disrupt the lives of residents and neighbors for what I would estimate to be about 3 years. If the actuarial tables are to be believed, I can look forward to spending the remaining years of my life, trapped in the middle of a major construction project. Hardly what I thought I was buying into.

I don't think that there has been any serious exploration of alternate solutions to the problem with the health care facility. The SRC resident alternative plan is a vast improvement but only one of a spectrum of alternative plans that have been rejected out of hand by PRS, or never considered at all.

In my view, PRS has started with the objective of increasing their revenue, and then worked backward to find a problem that justifies this action.

In the presentation to the residents regarding the project PRS has as claimed that only by vastly enlarging the number of IL residents can they defray the projected losses in the health care facility. They also claim that the increased number of residents served will result in economy of scale, less overhead expense per resident served. Both of these arguments are questionable.

You, as officials of the city of Saratoga, are our best and only hope for stopping this offence. What is being proposed will not benefit the city of Saratoga, the citizens of Saratoga living near the project, or the residents of SRC. It will benefit only PRS. Please help.

Regards,
Edmond R. Pelta

5. Letter from Michael Griffin

My name is Michael Griffin, and I am a member of the SRC residents who have formed the Preserve SRC Campus team. You have heard comments tonight from us and others, related to the negative impacts associated w/ the PRS management company's expansion plan. It is our opinion that their plan is incomed by multiple environmental impacts that deserve the particular attention of the EIR investigator. Here are just a few of those impacts that the CEQA law was designed to prevent.

Under the topic: **Public Services and Recreational Resources**

Given the magnitude of population growth envisioned, the management's plan does not address the need for increasing the availability of outdoor recreational facilities. On the contrary, be/c their building A will occupy the Historic Park, the campus will lose the current Bocce ball court, horseshoe range, putting green and pick-nick facilities. Which means that instead of recreational resources keeping pace w/ residential growth, resources are in fact diminished. This is an unacceptable impact on campus residents and their quality of life.

Under the topic: **Transportation**

Considering the increase in vehicular traffic from staff, residential and visitors, in addition to traffic generated by the eighty [80] residential units envisioned by the City's new housing quota for the Fellowship Plaza project... the management plan is deeply flawed in its inability to deal w/ negative transportation impacts resulting from this growth. We ask that the EIR undertake a complete reappraisal of the traffic impacts of ALL growth associated with both SRC expansion and that of Fellowship Plaza.

Furthermore, during construction, the total gridlock generated by the nature of the project's being scattered throughout the campus, will cause vehicular access to become completely congested and inoperable. Truck traffic, heavy equipment being mobilized in addition to staff, residential and visitor traffic will cause transportation to come to a standstill. This too is an unacceptable environmental impact.

Under the topic: **Cumulative Impacts**

The EIR will discuss the significant cumulative impacts of the proposed project when considered with other past, present, and reasonably foreseeable future projects in the area. This must include a thorough review of impacts caused by the requirements of the City's State-mandated growth plans at Fellowship Plaza. My comments above on the topic of Transportation apply to this Cumulative Impacts CEQA category.

Under the topic: **Alternatives**

Finally, the Residents' Alternative submitted to the City will provide the EIR consultant w/ a comprehensive improvement over the management's proposed expansion plan. The Residents' Alternative mitigates the negative impacts of that ill-conceived, in-fill development that brings w/ it the negative impacts pointed out by others this evening. The Residents' Alternative will bring CEQA values to the expansion of the SRC campus that is a treasure of the City of Saratoga.

Story poles: The City ordinance requiring story poles has a recent amendment that allows developers to substitute alternative visual methods in place of traditional poles. Unfortunately, this adjustment to the original rule thus allowing of alternatives to story poles does not offer criteria for granting exceptions to this important requirement. The lack of specifics has the effect of permitting developers to attempt closed door negotiations w/ senior City staff to dodge the visual impact that story poles have on viewers. This circumvents the intent of the law. Any such negotiations must be conducted in the light of day in front of a public hearing. Feed-back from our City Manager James Lindsay on this issue is encouraged.

6. PUBLIC SERVICES by Marilyn Basham

Public services in the EIR guidelines include the availability of public facilities and service systems. Currently the Skilled Nursing Facility (SNF) at Saratoga Retirement Community (SRC) does provide a small outpatient therapy department. According the recently submitted Pacific Retirement Services (PRS) project description, there is no description for an outpatient therapy department. This is in sharp contrast to the resident conceived alternative plan, PreserveSRCcampus.org, (**Preserve**), which does include in its NEW SNF, a state of the art outpatient department, a covered entrance and parking. In my opinion, the SNF is an extremely important feature of the campus and in the beginning; improving the SNF appeared to be the primary motivation for PRS to make changes to the campus in the first place. The priorities seem to have changed!

Shortly after I moved to Saratoga Retirement Community I attended a “planning” meeting presented by Pacific Retirement Services (PRS) that manages SRC on behalf of the Odd Fellow Homes of California (OFHC). The presentation centered on all the inadequacies of the Skilled Nursing Facility. PRS assessed the SNF as oversized, a financial drain, uncompetitive, and unattractive to potential residents. This was disturbing not only because I had just moved in but also because I was a retired physical therapist with a great deal of experience working in SNFs. I knew how important this element was to medical recovery.

As I learned more about the PRS expansion plans, the real priority became apparent. It was not about the SNF remodel but instead to build revenue generating independent residencies. Little has been presented to the residents about the amenities or details of the PRS remodeled SNF, not even clarification if the single rooms will have private showers and toilets, or if there are plans for outpatient services in the SNF for the community.

On the other hand, the resident conceived alternative plan, PreserveSRCcampus.org, (**Preserve**) has made details known to the residents and the public. See the “Addendum to the City”.

Preserve plans for the NEW SNF will have an outpatient therapy department with a covered entrance and parking. Additional features of the **Preserve** SNF will be its own kitchen for hot delivery of meals to patients as opposed to current Assisted Living (AL) kitchen made meals which are then pushed over in carts to the SNF. Since there are no plans to review, it is assumed that this “meals pushed across the street” method will continue in the remodeled PRS SNF.

If the PRS plan is adopted, it will force residents to endure a medical recovery process in a SNF that is under going a major remodel. Not only will public services not be available, but also the residents will be subjected to noise, dust, and major disruptions of electrical, plumbing, and air filtration systems. It has been suggested that the PRS remodel of the current SNF could take as long as four years. Hardly the medical recovery backup envisioned when one signed up for a Continuing Care Retirement Community (CCRC). It almost seems like” elder abuse” to have residents endure a medical recovery while trapped in a SNF being remodeled. This would not be the case if the **Preserve** Plan were adopted where the NEW SNF would be built, sized appropriately, and outfitted with the state of the art air filtration systems following the Post Covid codes. Only then would the old SNF be demolished and a beautiful NEW 52 IL units will be built in the footprint of the old SNF. This staging of construction would minimize noise and disruption for SRC residents and for our neighbors in Saratoga.

The thorough EIR review of the PRS proposed plan will reveal that NO public services are provided in the plans of the project: NO outpatient department, No improvement in the kitchen in the current SNF, NO air filtrations for air borne pathogens in the current SNF. The bottom line: There are certainly NO improvements for the current (CCRC) residents of SRC and no improvement or public services for the community.

Submitted by Marilyn Basham, current IL resident of SRC

Thank you for all your work on this issue. 12/11/2021

7. Letter by Jeffrey A. Schwartz

Jeffrey A. Schwartz, Ph.D.
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Cynthia Richardson
Consultant Planner
City of Saratoga
Community Development Department

December 10, 2021

-by email-

Hello, Cynthia-

This letter concerns the scoping for the EIR on the proposed SRC expansion.

I want to make two introductory comments, not so much for scoping as for perspective. First, as someone who has lived on San Marcos Rd. for well over 45 years, I can attest that Fellowship Plaza has always been an excellent neighbor. The Odd Fellows, not so much. At times, particularly 40 years ago, yes, because of management there. More recently, with PRS, no.

Second, when the last SRC expansion was planned, the city asked for a site master plan. The contractors hired by the Odd Fellows before PRS took over (Black and Kecker ?, I think, from South County) told the city at a Council meeting, that the site would be built out with that expansion and that the Odd Fellows would not ask for further expansion. I think there is no record of that and it is unenforceable, but I was there and it happened.

For each parameter listed below, please BOTH examine the impact of that parameter under the PRS proposal and ALSO compare the impacts under the residents' proposal ("Preserve proposal") with the impacts under the PRS proposal.

This is a formal request that the EIR examine the following parameters:

Aesthetics: The Manor is the most iconic and recognizable building in the city, and a historical landmark. If there is a more iconic building in the city, please identify it. The Preserve proposal will not alter the aesthetics of the Manor or its relation to the rest of the city. The PRS proposal will substantially degrade the aesthetics by destroying the entrance landscaping that frames the Manor and by constructing a two-story building ("B") directly in front of the Manor, *ruining the view of the Manor from half of Saratoga*. Importantly, it is the front view of the Manor that will be degraded or obscured, and that is the view of the Manor that is recognized.

Please note that I am Chair of the San Marcos Rd. Homeowners Association and that several of our homeowners have complained that their views of the Manor will be obstructed by construction and then permanently ruined. My family shares that complaint as we have expansive views of the manor from our property and the PRS proposal will wreck those views while the Preserve proposal will not.

Hazards and Hazardous Materials: SRC residents are elderly. Many use walkers, canes or wheelchairs. Some residents walk on the grounds for recreation almost every day. Other residents walk between buildings every day. The Preserve proposal will concentrate almost all construction to the periphery of the campus while the PRS proposal will concentrate construction on the center of the campus and the construction itself will be a huge hazard to residents, many of whom will elect to remain in their living units like shut-ins, rather than expose themselves to the years of substantial dangers of truck traffic and construction equipment.

Until the last SRC expansion in the late 90's, San Marcos Rd. and the Odd Fellows Dr. had separate parallel entrances onto Fruitvale. As a condition of that expansion, the city made SRC combine the two roads into a single ingress/egress. Since then, whenever there is a service truck parked on the road between Fruitvale and the roundabout, which happens frequently (PG&E, SRC grounds maintenance, etc.) it is very dangerous. There is only room for one car to pass the parked truck. Vehicles turning into the road from Fruitvale are often traveling fast and frequently cut across the corner. A car exiting and going around the parked truck is at risk and neither car sees far enough ahead to prevent a collision. In addition, some SRC employees drive much too fast on that road, particularly if they are a few minutes late to work. The situation there with lots of large trucks and heavy equipment carriers will be a nightmare for those of us who live on San Marcos Rd. and have no alternative but to use that road each day.

Quality of Life: I know this is not a specified EIR issue but there must be some acknowledgement of the impact of the combination of loss of recreational resources, loss of aesthetics, failure of land use and planning, risk of hazards, dramatic loss of air quality, loss of more than 45 "protected" and/or heritage trees (biological resources) and an exponential increase in noise and vibration, on the current elderly residents of SRC. A few years ago, at SRC's invitation, my wife and I attended an open house lunch – marketing event for prospective new SRC residents. The quiet, the beauty and the serenity of the campus and its safety were prominently marketed, along with the recreational activities, including the putting green, the bocce ball court, etc.. For almost all SRC residents, those were among the most important factors in their decision to move to SRC for their remaining years. SRC's proposal would take those things away from residents for three to six years. For some residents those will be the last years of their lives, spent in noise and dust and fear. That is simply "bait and switch", and unacceptable.

Biological Resources: The PRS proposal will destroy 46 protected and/or heritage trees, primarily oaks and redwoods, some over 100 years old. They cannot be replaced. Making PRS plant a large number of even 24-inch boxed trees is wholly inadequate. The beauty, the shade, the wildlife habitat will not be comparable even 30 or 40 years from now. Some mature trees absorb 10 to 50 TONS of CO2 per year. The Preserve proposal will save all those trees.

Many Saratoga residents have wanted to build or do an addition only to be told that they cannot remove a protected tree. One tree. If PRS can destroy 46 protected trees it will further the cynical view that there are two sets of rules in Saratoga, one for developers and the other for regular homeowners.

There is an important riparian corridor on the SRC campus and many varieties of wildlife use that corridor. I have seen a wide variety of birds and animals myself on occasional walks through the campus. If most of the center of the campus is in the midst of long-term construction for years, per the PRS Proposal, much of that wildlife may abandon use of that corridor. If, instead, only one area of the campus is under construction, per the Preserve proposal, the wildlife may well find other routes around that one area but still use the riparian corridor.

Air Quality: The last SRC expansion created serious air quality problems for those of us on San Marcos Rd.. We had dust and dirt on everything outside for several years. Our patio furniture was always dirty. Our swimming pool needed resurfacing. Other neighbors had the same issues. The Preserve proposal moves all of the construction from the part of the SRC campus closest to us, to the portion of the campus farthest from us. That would be a big help with air quality as well as with noise and vibration.

Some SRC residents use oxygen. Others have less severe breathing problems, but breathing problems nevertheless. The PRS proposal will put most of the construction in the center of the campus, where the airborne dirt and dust will have the most effect on the most SRC residents. The location of the construction in the Preserve proposal would substantially mitigate this problem.

Noise and Vibration: One of the San Marcos Rd. residents (Nicolai) spoke at the scoping meeting and described the vibration inside his house when trucks at SRC go over the two speed bumps near his house. My family still remembers the years of intrusive - and seemingly almost constant - noise from trucks and heavy equipment when SRC did its last expansion, and we are more distant from the SRC road than Nicolai is. Once again, the Preserve proposal would have a clear and substantial advantage because it would move most construction to the part of the SRC campus farthest from us and our San Marcos Rd. neighbors.

That same advantage would be true for the SRC residents. Make no mistake: they will suffer negative consequences if this construction is done in any manner, but moving the construction to the edge of the campus would strongly mitigate the impacts of noise and vibration on most current SRC residents.

Hydrology and Water Quality: The San Marcos Rd. homeowners raised this issue repeatedly when the last SRC expansion was undertaken. Our road and our homes are lower elevation than the SRC property and we were concerned with runoff, particularly since the expansion meant parking lots and other impervious coverage near our road and properties. The PRS assurances turned out to be meaningless. Nitin Jain's property (corner of San Marcos Rd. and the Campo Calle cul-de-sac) has had serious problems with runoff from SRC, particularly after heavy rains. That is after a prior owner of that house installed an expensive drainage system all the way around the house's perimeter. Closer to Fruitvale on our road, there is a location that has had runoff from SRC frequently, for years. We have personally reported that to PRS management on several occasions, with no response. That runoff is likely the result of an underground spring on the SRC campus that has never been located or dealt with. No matter which alternative is chosen, we request that SRC, as part of any new construction, be required to survey all underground springs on their property and develop a comprehensive, site-wide hydrology plan. Otherwise, new construction sites, under the PRS proposal, may unearth additional springs. More construction on our side of the campus will exacerbate our runoff problems from SRC. The Preserve proposal would separate us from the new construction and be less likely to create additional hydrology issues for our road and homeowners.

Recreational Resources: The SRC residents currently have access to a lovely park-like setting in the center of the campus, with a putting green, a bocce ball court, a horseshoe pitch, seating benches and walking paths through the gardens in that area. The PRS proposal will destroy all of that and replace those recreational resources with ... NOTHING. That is unfair to the residents who chose to move to SRC in partial reliance on those resources and facilities. It also diminishes the attractiveness of the campus for the larger surrounding community. Obviously, the Preserve proposal saves all of those recreational resources.

Tribal Cultural Resources: When we first moved to Saratoga, our children were little and used to play at the old community gardens on the Odd Fellows property. They and their friends often found Native American artifacts, most often arrowheads. My memory is that at one time there was discussion of a Native American burial ground on the property, but I am not sure. Perhaps the EIR done for the SRC last expansion would be helpful in that regard. If there are such issues, it would seem obvious that the PRS proposal, which involves excavating several new sites on the campus, would be far more intrusive than the Preserve proposal, which works with existing building sites.

Population and Housing: The PRS proposal would site the 50+ new independent living units in three separate and free-standing buildings. The Preserve proposal would locate all of those new units in a single building. Some residents have mobility issues. Bad weather can also restrict residents' outdoor movement. In short, a single building is a better housing alternative for the new units than three separate buildings because it is more likely to build a better sense of community and facilitate relationships among and between residents of the new units.

Wildfire: Our area is far from immune to wildfires. We know that now even if we didn't prior to the last few years. A wildfire burning in the heavily treed riparian corridor could easily necessitate evacuation of the entire SRC campus. Even if the buildings were not burning—which they could—smoke inhalation could quickly become life threatening. An earthquake could also force evacuation, for that matter. It would be faster and easier to evacuate residents from one building (Preserve proposal) than to evacuate the same number of residents from three separate, non-contiguous buildings (PRS proposal).

Geology and Soils: This area is fraught with unstable soils, moving landslides and the like. A geological survey of the sites identified in both proposals is a necessity. It is likely the Preserve proposal, using two already established building sites, will involve less geological risk than the PRS proposal, dependent on three new sites.

Greenhouse Gas Emissions: Please see discussion of trees in “Biological Resources”, above.

Additional: When the last SRC expansion occurred, The San Marcos Rd. residents negotiated with PRS over several issues. One of these was the construction of a six ft. wall (cement block or something like freeway walls) down the median between San Marcos and the Odd Fellows Dr.. We argued we would need that to cut down on noise and air pollution during construction, and then ongoing noise after construction. I was personally involved in those discussions. PRS was initially amenable until the last moment, when it was clear they would get approval. Then they said categorically “No”, saying bushes in the median would be adequate. They were wrong in every way. The construction noise and dirt were a years-long disaster. The bushes are no help with ongoing noise from the SRC delivery trucks, some very early morning. SRC workmen and other employees, on their way in or out of the property, through food containers and beer cans in the bushes, which are left untended until PRS wants something from the city, like now. If any proposal for expansion is approved, we request a condition requiring PRS to construct a permanent, block, stone or ceramic six ft. wall in that median to mitigate our air quality and noise impacts.

That wall would also eliminate a long-standing problem with light spill from SRC. At the last expansion, PRS installed very bright walkway lights from Fruitvale to the old lodge building, every few feet along the Odd Fellows Dr.. Besides being extremely energy wasteful, those lights stayed on until late at night and shone directly into the front windows of the houses on our road facing San Marcos. Years ago, we asked prior SRC management if they would remove two-thirds of the bulbs, leaving one fixture in three working, which provided more than enough light for safety. That was an acceptable solution for a number of years, until PRS decided they wanted the road lit up like a Christmas tree again, without consulting any of us. A wall will fix that problem as well as others.

If you have questions or need additional information about any of this, please contact me directly.

Regards-
Jeff
Jeffrey A. Schwartz

8. Article on Saratoga Retirement Community expansion issues in the *Saratoga High School Falcon Newspaper* Dec. 3, 2021—by Carolyn Wang and Sara Bright (URL)

<https://saratogafalcon.org/content/senior-and-local-residents-advocate-for-an-alternative-to-the-proposed-construction-at-the-saratoga-retirement-community/>

Senior and local residents advocate for an alternative to the proposed construction at the Saratoga Retirement Community

December 3, 2021 — by Carolyn Wang and Sara Bright

Photo by Selina Chen

The Odd Fellows manor would be obscured by a new building under the current plan.



“Do you see those two trees there?” Tsing Bardin, a resident of the Saratoga Retirement Community (SRC), a senior home near West Valley College, asked as she pointed at a pair of old growth redwoods. “No more.”

Shaking her head in disappointment, she turned toward a cluster of large palm and oak trees that line the front of the SRC’s iconic grand, white manor.

“Gone,” she said.

In order to increase the housing available for local seniors and help satisfy the new state **housing requirements**, Pacific Retirement Services (PRS), a group based in Oregon and hired by the Saratoga Retirement Community (SRC) to manage the senior center, submitted a **proposal** in 2019 that would add three buildings to the campus, totaling 52 new independent living units.

Although the plan is still under review, it has garnered strong opposition from a majority of current senior residents and some neighbors who share concerns over the proposal’s implementation and are advocating for an **alternative** plan.

The company has defended its approach by saying it is sound both economically and environmentally and the residents’ plan would not work.

But that argument has not won over residents like 88-year-old Robert Berglund.

“One of the things you’ll note about entering our campus is its open space, green grass, trees and the manor building,” said Berglund, who has lived in Saratoga since 1969 and moved to the SRC in the beginning of 2015 with his wife. “We don’t mind having additional independent living units. Our objection is we think we have a better place to put them. [The plan] would ruin all of the campus atmosphere.”

The manor building Berglund mentioned is the senior center’s Odd Fellows Home, a unique centerpiece of the campus. It was originally built in 1912 to house aging residents by the Independent Order of Odd Fellows, a non-political fraternity that does charity for people in need. The building is currently listed on the city’s **Historic Resources Inventory**.

If the current proposal goes through, one of the new buildings would be constructed directly in front of the Odd Fellows Home, obscuring the view of the historical manor from passersby and replacing the entrance parking lot. The other remaining two buildings would replace the campus's bocce ball courts in the Odd Fellows Historical Park and require the removal of over 60 mature trees, 45 of which are classified as "protected," according to a [website](#) created by residents to counter the plan.

SRC executive director Sarah Stel said that out of 37% of the SRC that is currently open space, 31% would still remain open space under the company's plan.

In addition, she noted that the current plan, which is approved by the SRC's owners the Odd Fellows Home of California, meets all the financial, environmental and functional criteria needed to move forward with the city's entitlement process. She also said that everyone agrees with the need for increased amenities and living units to meet the needs of residents.

Despite this, around 10 other residents on the campus voiced concerns during the city's Nov. 16 Community Information Meeting regarding the proposal's disregard for the manor, recreation area and trees.

In a survey conducted by the SRC residential council, 60% of residents share this stance and have additional concerns regarding emergency evacuations if the proposed construction were to take place because it would completely block off SRC's only entrance.

Opposition to the plan is not only limited to seniors living in the retirement home.

"The manor building is likely the single most iconic structure in the city of Saratoga. To take a new building and build it directly in front of it is psychotic," said Jefferey Schwartz, a neighbor of the SRC, during a Nov. 16 meeting. "Suggesting that you can take down 100-year-old heritage trees and replace them with something of equal value is an insult to people's intelligence."

The reason the elderly chose to move to the SRC, Schwartz said, was the beauty, peace and tranquility of the location, and not because they look forward to four to six years of large-scale construction.

To counter the current plan, residents of the SRC, led specifically by a core group of seven individuals including Bardin and Berglund, have been developing and advocating for a viable alternative in the past few years.

In their alternative plan, instead of constructing facilities in front of the manor and on the Historical Park, a larger building housing all 52 independent living units would replace the site's current Health Center, which residents say is too big for the current people in skilled nursing care.

A new health-care center would then be built where PRS originally planned for its third new residential building, and the PRS's other two proposed buildings wouldn't be needed at all. Both plans result in the required 52 independent units, a renovation to the outdated health center, a remodeled fitness space and a new meeting room. The difference is that the residents' plan would preserve the manor view, the Odd Fellows historical park and most of the trees, Bardin said.

The residents submitted their plan, which is currently under review, to the city in June and have continued to object to the current PRS plan. Despite their opposition, they feel as if they have been left unheard each time they have raised concerns.

“We think the management company has turned a deaf ear to our alternative plans and our thoughts,” Berglund said. “They have not varied their plan at all for the last two to three years, and we don’t believe that we have really been listened to or responded to meaningfully.”

Stel, the executive director, said that the Preserve SRC counterproposal poses several challenges, the biggest being financial risk. Because it requires destroying the existing health care center before building any new revenue-generating residences, the plan could be financially disastrous if market conditions shift.

In contrast, Stel said the current proposal would build the majority of the new residences first, providing revenue to help pay for the rest of the plan.

Another issue Bardin cited is what she called a consistent line of disregard by PRS to holistically and fairly evaluate the campus wildlife that the current plan would destroy.

All the trees classified as sustainability moderate or low, which implies that the trees can be removed, Bardin said, are conveniently the ones that need to be cut down for construction, while the trees classified as healthy do not interfere with the proposed construction whatsoever. The city arborist initially copied the commercial arborist’s report without examining the trees, until Bardin herself questioned the discrepancies to the city arborist during an in-person visit in which the arborist conceded that all the trees are healthy.

“I don’t believe it was a fair evaluation,” Bardin said.

In response to wildlife concerns, Stel said their plan fit the city’s requirements and would plant 240 new trees to replace the 124 trees that would be removed.

Bardin countered that, saying how although the number would increase, the new trees would not compare to the magnitude of the older trees.

To raise awareness about the topic, senior residents have walked door to door in the surrounding streets to garner support from Saratoga residents. They also plan to post notices on NextDoor, follow up with neighbors who strongly support the alternative plan, continue hosting Zoom meetings urging residents to write letters to the city and provide input during a 30-day public scoping period between November and Dec. 22 for the plan’s **Environmental Impact Report (EIR)**.

“We value the quality of life on our campus and we don’t want it to be ruined,” Berglund said. “That’s what it comes down to.”

In order to learn more about the senior residents’ alternative plan, please visit [PreserveSRCcampus.org](https://www.preserveSRCcampus.org). The city was scheduled to hear an EIR Public Scoping Meeting on Dec. 9 over Zoom regarding the current proposal.

PUBLIC SERVICES

Public services in the EIR guidelines include the availability of public facilities and service systems. Currently the Skilled Nursing Facility (SNF) at Saratoga Retirement Community (SRC) does provide a small outpatient therapy department. According to the recently submitted Pacific Retirement Services (PRS) project description, there is no description for an outpatient therapy department. This is in sharp contrast to the resident conceived alternative plan, PreserveSRCCampus.org. (**Preserve**), which does include in its NEW SNF, a state of the art outpatient department, a covered entrance and parking. In my opinion, the SNF is an extremely important feature of the campus and in the beginning; improving the SNF appeared to be the primary motivation for PRS to make changes to the campus in the first place. The priorities seem to have changed!

Shortly after I moved to Saratoga Retirement Community I attended a “planning” meeting presented by Pacific Retirement Services (PRS) that manages SRC on behalf of the Odd Fellow Homes of California (OFHC). The presentation centered on all the inadequacies of the Skilled Nursing Facility. PRS assessed the SNF as oversized, a financial drain, uncompetitive, and unattractive to potential residents. This was disturbing not only because I had just moved in but also because I was a retired physical therapist with a great deal of experience working in SNFs. I knew how important this element was to medical recovery.

As I learned more about the PRS expansion plans, the real priority became apparent. It was not about the SNF remodel but instead to build revenue generating independent residencies. Little has been presented to the residents about the amenities or details of the PRS remodeled SNF, not even clarification if the single rooms will have private showers and toilets, or if there are plans for outpatient services in the SNF for the community.

On the other hand, the resident conceived alternative plan, PreserveSRCCampus.org, (**Preserve**) has made details known to the residents and the public. See the “Addendum to the City”. Check website: PreserveSRCCampus.org.

Preserve plans for the NEW SNF will have an outpatient therapy department with a covered entrance and parking. Additional features of the **Preserve** SNF will be its’ own kitchen for hot delivery of meals to patients as opposed to current Assisted Living (AL) kitchen made meals which are then pushed over in carts to the SNF. Since there are no plans to review, it is assumed that this “meals pushed across the street” method will continue in the remodeled PRS SNF.

If the PRS plan is adopted, it will force residents to endure a medical recovery process in a SNF that is under going a major remodel. Not only will public services not be available, but also the residents will be subjected to noise, dust, and major disruptions of electrical, plumbing, and air filtration systems. It has been suggested that the PRS remodel of the current SNF could take as long as four years. Hardly the medical recovery backup envisioned when one signed up for a Continuing Care

Retirement Community (CCRC). It almost seems like "elder abuse" to have residents endure a medical recovery while trapped in a SNF being remodeled. This would not be the case if the **Preserve** Plan were adopted where the NEW SNF would be built, sized appropriately, and outfitted with the state of the art air filtration systems following the Post Covid codes. Only then would the old SNF be demolished and a beautiful NEW 52 IL units will be built in the footprint of the old SNF. This staging of construction would minimize noise and disruption for SRC residents and for our neighbors in Saratoga.

The thorough EIR review of the PRS proposed plan will reveal that NO public services are provided in the plans of the project: NO outpatient department, No improvement in the kitchen in the current SNF, NO air filtrations for air borne pathogens in the current SNF. The bottom line: There are certainly NO improvements for the current (CCRC) residents of SRC and no improvement or public services for the community.

Submitted by Marilyn Basham, current IL resident of SRC
Thank you for all your work on this issue.
12/11/2021

Marilyn Basham

Rawnsley, Emma

From: Cynthia Richardson <crichardson@saratoga.ca.us>
Sent: Tuesday, December 21, 2021 9:07 AM
To: Rawnsley, Emma
Subject: [EXTERNAL] Fw: NOP-EIR Saratoga Retirement Center, 14500 Fruitvale Ave., Saratoga, CA



Cynthia Richardson | Consultant Planner
City of Saratoga | Community Development Department
13777 Fruitvale Avenue | Saratoga, CA 95070
crichardson@saratoga.ca.us | www.saratoga.ca.us

From: Charles Cummins <cfclaw@gmail.com>
Sent: Monday, December 20, 2021 1:38 PM
To: Cynthia Richardson <crichardson@saratoga.ca.us>
Subject: NOP-EIR Saratoga Retirement Center, 14500 Fruitvale Ave., Saratoga, CA

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

We are residents of Cottage #6140 at Saratoga Retirement Community ("SRC") writing to oppose the application by Odd Fellows/Pacific Retirement Services for a Master Plan Update at 14500 Fruitvale Ave., Saratoga, CA 95070. We are longtime Saratoga residents.

1. Odd Fellows proposes to destroy the architectural beauty of this facility and its iconic Manor House. In order to appreciate its beauty you have to see the Manor House as you approach it on Odd Fellows Drive. It is gorgeous and particularly striking at night. This sight will be lost if the Odd Fellows' application is approved.. The "Aesthetics" portion of the EIR application does NOT mention an assessment of proposed visual changes of this magnificent Manor House which dominates SRC. We have heard that Odd Fellows is attempting to secure approval of its project without erecting the customary sight line poles which would highlight these changes.
2. The proposed construction of independent living units on the Memorial Garden area eliminates the only open flat land at SRC. It currently provides the only outdoor garden/recreation space at SRC.
3. Evacuation of SRC in the event of a catastrophic earthquake or wildfire emergency presently is difficult and troubling. Evacuation routes are tight and limited. Adding more units and residents only exacerbates this life threatening problem. We do not think that the proposed evacuation changes solve these problems.
4. The proposal spreads major and disruptive construction activity around our SRC community in a manner that will affect all residents. We are the ones who will have to live with this disruption. We all have invested a lot of money in entry fees to live out our final years at SRC. We cannot simply move out and attempt to find another home in Saratoga or surrounding communities.
5. One final note. Having been forced into a position of opposition, many residents out of desperation, have responded with an Alternate Plan. Under any objective analysis this Alternate Plan is far superior to the Odd Fellows' plan and accomplishes the same goals. Yet the Odd Fellows have simply tossed it and the residents' objections aside.

PLEASE DO NOT APPROVE THE ODD FELLOWS' PROPOSAL.

Thank you for your consideration.

Charles and Anne Cummins

From: [D. Michael Griffin](#)
To: [Anthony Vandersteen](#)
Cc: [Cynthia Richardson](#); [Bob Bergland](#); [Colin Whitbey-Strevens](#); [Dick du Bridge](#); [Don & Jan Schmidek](#); [Tsing Bardin](#)
Subject: Re: SRC Expansion Plan
Date: Sunday, December 19, 2021 2:57:00 PM

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Tony... a friendly reminder: Cynthia is not the decision maker here. The Planning Commissioners followed by City Council members are the deciders and your comments are better directed to these elected officials, not the City's staffer. Just sayin'.

Sent from my iPhone
Michael G

> On Dec 19, 2021, at 10:39 AM, Anthony Vandersteen <anthonyvann@att.net> wrote:

>

> Hi Cynthia, this is Anthony Vandersteen, and I wanted to get my 2 cents worth in to you from my perspective on the current Expansion Plan situation.

>

> We moved here in 2016 and specifically asked if they planned any new development, and were told no, other than a possible minor staff building at the staff parking lot. Having spent \$540,000 for the entrance fee, the news in 2017 came as a huge shock. The PRS plan has not changed from the original in 2017, and is literally being shoved down our throats. They have refused to budge even though we have presented an excellent Alternative Plan, which does all they need, but with far less trauma to the residents at SRC. I'm sure you know all the arguments by now, and we can only hope you treat us equally with PRS in judging the two plans. PRS are situated in Oregon and have little interest in the quality of life of the residents at SRC or in Saratoga in general. For them it is purely dollars that influences their decision. We have never understood how the owners of SRC, ie The Odd Fellows, can quietly accept such ruination to their very own property, one they are supposedly proud of. Maybe they have yet to fully understand the overall affect of this destructive plan. Apparently they also have little to no interest in the aesthetic values of how the whole place looks, or the value of respecting the heritage of the wonderful old Manor building, and the associated views which we all love. This is your decision of course but we sincerely hope we have a fair chance of having our plan accepted.

>

> My particular axe to grind is the multi-year construction trauma associated with a huge project like this. I have much experience with construction sites as I spent 15 years working for Habitat for Humanity in the South Bay, at maybe a dozen different sites. They are messy, dirty, dangerous places, and absolutely not the place where you want a lot of elderly people. I had a couple of serious falls during this time, one of which landed me in hospital. The noise alone will be really objectionable sometimes, and at the locations planned for the PRS sites they will be impossible to avoid. Huge deep holes for the underground parking lots and foundations will be very hazardous, which may well flood in the wet season, and will be impossible to screen from the residents, due to the central location of most of the sites. This fact alone heavily favors the Alternate Plan as this is all situated on the eastern border of the campus, and is fairly easy to screen with wooden barriers, thus keeping the residents completely away from the heavy actions.

>

> We know the Alternate Plan is far more popular to all the residents here than the PRS plan. During the EIR meeting you heard a sampling of views from residents and neighbors alike, all expressing the overwhelmingly negative feelings we all have about the PRS plan. The tree issue alone should be enough to convince anyone, but we all recognize the power of a large corporation, and need as much help as we can possibly get. I know you are primarily concerned with the city's need for more housing, but sincerely hope you can favor the side of the residents who live in your city.

>

> Thanks very much for your fair treatment of the Alternate Plan so far, and for all you do for the city.

>

> Sincerely Anthony Vandersteen

Rawnsley, Emma

From: Cynthia Richardson <crichardson@saratoga.ca.us>
Sent: Tuesday, December 21, 2021 9:08 AM
To: Rawnsley, Emma
Subject: [EXTERNAL] Fw: SRC Expansion



Cynthia Richardson | Consultant Planner
City of Saratoga | Community Development Department
13777 Fruitvale Avenue | Saratoga, CA 95070
crichardson@saratoga.ca.us | www.saratoga.ca.us

From: Betsy Landergren <betsylan@pacbell.net>
Sent: Tuesday, December 21, 2021 8:55 AM
To: Cynthia Richardson <crichardson@saratoga.ca.us>
Cc: Bardin Tsing <tsingtb@gmail.com>; Marilyn Manies <marilynmanies@gmail.com>
Subject: SRC Expansion

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Cynthia Richardson
City of Saratoga Community Development Dept
13777 Fruitvale Ave., Saratoga, CA 95070

Dear Ms. Richardson,

I have recently moved to SRC, and have learned of the proposed expansion plan and the residents' alternate plan.

The first one would be devastating to me because I live in Cottage 6102 which would be in the war zone for years.

But more importantly, the proposed plan would eliminate the only level area where we seniors can enjoy the outdoors. This is the area with the putting green, bocce court, & benches for us to sit & take in the sun & fresh air. This is our very health!

And the removal of heritage trees would be a tragedy. These trees are vital not only to the air quality of this region, but the general state of health for us living, breathing humans. They hold the soil in place, produce the oxygen we breathe, and help clean the air of our pollutants.

We cannot continue to concrete this earth merely to fill our purses.

SRC will not be nearly as attractive to folks in the future if the initial plan is adopted. Please adopt the Residents' plan which offers the same improvements, but does not have the devastating effect on the health of Saratoga (not just SRC) & its residents. Preserve this oasis of greenery; it is why we moved here.

Most sincerely,
Elizabeth H. Landergren
14500 Fruitvale Ave., Cottage 6102
Saratoga, CA 95070
650-776-9658
408-741-7206

Rawnsley, Emma

From: Cynthia Richardson <crichardson@saratoga.ca.us>
Sent: Wednesday, December 08, 2021 4:53 PM
To: Rawnsley, Emma
Subject: [EXTERNAL] Fw: Saratoga Retirement Community expansion

Scoping Comments for your information.



Cynthia Richardson | Consultant Planner
City of Saratoga | Community Development Department
13777 Fruitvale Avenue | Saratoga, CA 95070
crichardson@saratoga.ca.us | www.saratoga.ca.us

From: MARILYN MANIES <marilynmanies@gmail.com>
Sent: Wednesday, December 8, 2021 4:28 PM
To: Cynthia Richardson <crichardson@saratoga.ca.us>
Subject: Saratoga Retirement Community expansion

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

As a recent resident of the Saratoga Retirement Community (SRC), I am writing to express my concern over the expansion program proposed by Pacific Retirement Services (PRS) and ask that you seriously consider the alternate proposal by the residents of SRC.

Saratoga proudly calls itself "The City of Trees" and as a 38-year homeowner in this city, I have experienced firsthand how the city has protected the trees within its boundaries. Yet, now before the city council is a plan by PRS to remove more than 60 trees as part of the SRC expansion for buildings A, B and the meeting room, 45 of these trees being protected. An alternative plan put forth by the residents would save all of these trees and still allow for the building of 52 new housing units.

AESTHETICS

Trees on the SRC campus contribute greatly to the aesthetics, peace and tranquility for seniors who have left their previous houses and have chosen to live there. All SRC residents live in 1 or 2 bedroom homes, most having moved from much larger dwellings and spacious yards. In choosing SRC, they were drawn to the beauty, shade, ambiance, and open spaces of the campus and object to their rural setting being denuded of mature trees and replaced by multi-story buildings. Yes, PRS plans to replace the uprooted trees with 240 new trees, but they can never in the lifetime of these residents replace the current ones, some of which are over 100 years old.

AIR QUALITY/GREENHOUSE GAS EMISSIONS

These valuable trees absorb carbon dioxide, taking carbon out the the air while providing oxygen, filtering the air and offering a buffer to noise. They provide coolness at a time of extreme global warming. In addition, they are landmarks and a great source of pride to this historic setting.

We encourage you to visit our campus and see for yourself what a benefit these trees are. Please seriously consider the resident's alternative proposal.

Sincerely,
Marilyn Manies

Edmond R. Pelta

14500 FRUITVALE AVE.

SARATOGA, CA 95070

Phone: (408) 741-7204

pelta2490@comcast.net

December 15, 2021

Cynthia Richardson
City of Saratoga, planning department,

I will start by stating that as a professional consulting engineer who has spent a long career assisting various corporations in project leading to making money for their stockholders, I have no objection in corporations such as PRS pursuing that goal for their stockholders, and for the Odd Fellows. I don't believe that making money is a bad motive. That said, I feel that the proposed project has serious flaws and exceeds what I would consider to be the normal standard of corporate ethics. What is being proposed, may not be illegal, but it is certainly a breach of good faith relative to the residents of SRC which were lured into a relationship with SRC based on certain understandings which PRS now proposes to violate.

The project is presented to the city of Saratoga as a way of fulfilling its requirement to provide additional housing. I would suggest that in the case of the proposed expansion plan, this is largely an illusion. Yes the expansion would provide 52 apartments but these would be devoted to very up-scale retired individuals or couples. I would suggest that there is no great shortage of units of this type in this geographical area. At the same time, one could expect that the expansion would add about 50 more employees (based on present ratios) who would need housing but could not afford to live near here.

The construction involved in the PRS plan would build on almost every square foot of the accessible open space that has been a major attraction of SRC and has contributed to making it a desired neighbor for those Saratoga residents living around the parameter of SRC.

I, and many other residents are essentially prisoners of PRS. I have a substantial investment, buy in, that I can not afford to abandon. Additionally, I am too old to contemplate moving again. I moved to SRC because of the spacious and attractive nature of the facility. The construction involved would, disrupt the lives of residents and neighbors for what I would estimate to be about 3 years. If the actuarial tables are to be believed, I can look forward to spending the remaining years of my life, trapped in the middle of a major construction project. Hardly what I thought I was buying into.

I don't think that there has been any serious exploration of alternate solutions to the problem with the health care facility. The SRC resident alternative plan is a vast improvement but only one of a spectrum of alternative plans that have been rejected out of hand by PRS, or never considered at all.

In my view, PRS has started with the objective of increasing their revenue, and then worked backward to find a problem that justifies this action.

In the presentation to the residents regarding the project PRS has as claimed that only by vastly enlarging the number of IL residents can they defray the projected losses in the health care facility. They also claim that the increased number of residents served will result in economy of scale, less overhead expense per resident served. Both of these arguments are questionable.

You, as officials of the city of Saratoga, are our best and only hope for stopping this offence. What is being proposed will not benefit the city of Saratoga, the citizens of Saratoga living near the project, or the residents of SRC. It will benefit only PRS. Please help.

Regards,
Edmond R. Pelta

Rawnsley, Emma

From: Cynthia Richardson <crichardson@saratoga.ca.us>
Sent: Monday, December 06, 2021 5:17 PM
To: Rawnsley, Emma
Subject: [EXTERNAL] FW: SRC (Saratoga Retirement Community): Scope of E.I.R.

Scoping comment for your information.

Cynthia Richardson
Consultant Planner
City of Saratoga | Community Development Department
13777 Fruitvale Avenue | Saratoga, CA 95070
(408) 868-1225 |

[https://urldefense.com/v3/__http://www.saratoga.ca.us__;!!ETWISUBM!m5NuvV615YQo5yzKSXCJJOfVg1M99aw9Z5yu0X7p_6iwYA8ZAC08bOx6G6HprnkQ\\$](https://urldefense.com/v3/__http://www.saratoga.ca.us__;!!ETWISUBM!m5NuvV615YQo5yzKSXCJJOfVg1M99aw9Z5yu0X7p_6iwYA8ZAC08bOx6G6HprnkQ$)

Office Hours Mondays and Thursdays

-----Original Message-----

From: Hubert Roberts <hubert.roberts@icloud.com>
Sent: Tuesday, November 30, 2021 3:15 PM
To: Cynthia Richardson <crichardson@saratoga.ca.us>
Subject: SRC (Saratoga Retirement Community): Scope of E.I.R.

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Are the following items in the scope of the E.I.R.?

1. "construction of a trail" While in the original proposal, John Cherbone (Public Works Director) members of the community, and the Trails Committee have done "due diligence" on this issue and concluded the original trail was the best answer. Is "construction of a new trail" still part of the E.I.R.?
2. This is a classic "flag lot" with one entrance/exit for SRC, plus rights of use by San Marcos residents, as well as the adjacent Fellowship Plaza residents. The city has already approved an addition of 75 new units (potentially 150 residents) for Fellowship Plaza. As part of the E.I.R., will the maximum density for such a "flag lot" be addressed? This one narrow road must be used by hundreds of residents, workers, visitors, and very large delivery trucks. This appears to be within the scope for both traffic and safety issues.

Thank you, Hugh Roberts

“Ladies and Gentlemen - now for the other side of the story:

The proposed PRS plan is a Disgrace, Disrespectful of Residents, Neglectful of Saratoga Citizens and with total disregard of Nature. The PRS plan was conceived over some 5-7 years by PRS, without any consideration on the Residents, the Environment, the City and the Future. It was designed with an apparent concept of “fill and add” buildings to any and all empty locations on the Campus

I am an 11 years resident of SRC, and a very satisfied one, but the PRS plan, if Approved, will be of immense negative impact to our remaining lives and to many other residents as well in the future.

Our cottage, across the street of the IOOF Memorial Park, has a great and peaceful view, but this plan, as proposed, places a large apartment building in the Park, and 2 additional building down our street. We will have great views of tree removals, construction, and traffic. The same will occur to many other apartment residents. The demise of our beloved Bocce-Ball court, The Park, the Open Picnic space and the loss of some 60 majestic Trees is a tragedy!

The roar of bulldozers, excavators, trucks, etc. will be devastating to our last years. The thousands of semis carting the excavated dirt will have terrific direct impact on many SRC residents, and on Saratoga residents and the City streets and roads as well

On the other hand, The Resident’s plan of just 2 buildings with same total capacity, eliminates the triple construction on our street, places only 1 new building to a peripheral, less impacting location, replaces an old Health Center with a Modern one, saves over 60 grand trees and does not require the rerouting of 4 campus streets, an addition and relocation of 4 campus intersections, and it adds 4 more intersections to w. Cottages Ln, increasing the perils on that street.

We choose SRC because of its Saratoga location, its open Campus, its Trees, its Park and its Residents. We expected and bought into peaceful last years, but not to live in a construction zone and in a crowded campus as proposed in this plan. We consider the loss of our Park a Calamity, the loss of 60+ old trees a Sacrilege, and the construction time an utter Abuse of our contract, totally Disrespectful of our last years.

We ask again PRS and the Odd Fellows, “Please Tear down your Plans” and consider the resident’s less Intrusive, less Abusive, more Preserving and more Effective plan.

We request the Saratoga Citizens to Object to the presented plans, the City Administrators to Deny the proposal, and the Saratoga City Council to Reject the present PRS plans.

And finally, we suggest that you and our neighbors, please visit the campus after the story poles are installed and draw your own conclusions and express these to our City Leaders!

Thank You

SRC Resident - SRC expansion proposal

12/9/21

Jeffrey A. Schwartz, Ph.D.
19281 San Marcos Rd.
Saratoga, California 95070

(408) 529-4077
jasletra@aol.com

Cynthia Richardson
Consultant Planner
City of Saratoga
Community Development Department

December 10, 2021

-by email-

Hello, Cynthia-

This letter concerns the scoping for the EIR on the proposed SRC expansion.

I want to make two introductory comments, not so much for scoping as for perspective. First, as someone who has lived on San Marcos Rd. for well over 45 years, I can attest that Fellowship Plaza has always been an excellent neighbor. The Oddfellows, not so much. At times, particularly 40 years ago, yes, because of management there. More recently, with PRS, no.

Second, when the last SRC expansion was planned, the city asked for a site master plan. The contractors hired by the Oddfellows before PRS took over (Black and Kecker ?, I think, from South County) told the city at a Council meeting, that the site would be built out with that expansion and that the Oddfellows would not ask for further expansion. I think there is no record of that and it is unenforceable, but I was there and it happened.

For each parameter listed below, please BOTH examine the impact of that parameter under the PRS proposal and ALSO compare the impacts under the residents' proposal ("Preserve proposal") with the impacts under the PRS proposal.

This is a formal request that the EIR examine the following parameters:

Aesthetics: The Manor is the most iconic and recognizable building in the city, and a historical landmark. If there is a more iconic building in the city, please identify it. The Preserve proposal will not alter the aesthetics of the Manor or its relation to the rest of the city. The PRS proposal will substantially degrade the aesthetics by destroying the entrance landscaping that frames the Manor and by constructing a two-story building ("B") directly in front of the Manor, ruining the

view of the Manor from half of Saratoga. Importantly, it is the front view of the Manor that will be degraded or obscured, and that is the view of the Manor that is recognized.

Please note that I am Chair of the San Marcos Rd. Homeowners Association and that several of our homeowners have complained that their views of the Manor will be obstructed by construction and then permanently ruined. My family shares that complaint as we have expansive views of the manor from our property and the PRS proposal will wreck those views while the Preserve proposal will not.

Hazards and Hazardous Materials: SRC residents are elderly. Many use walkers, canes or wheelchairs. Some residents walk on the grounds for recreation almost every day. Other residents walk between buildings every day. The Preserve proposal will concentrate almost all construction to the periphery of the campus while the PRS proposal will concentrate construction on the center of the campus and the construction itself will be a huge hazard to residents, many of whom will elect to remain in their living units like shut-ins, rather than expose themselves to the years of substantial dangers of truck traffic and construction equipment.

Until the last SRC expansion in the late 90's, San Marcos Rd. and the Oddfellows Road had separate parallel entrances onto Fruitvale. As a condition of that expansion, the city made SRC combine the two roads into a single ingress/egress. Since then, whenever there is a service truck parked on the road between Fruitvale and the roundabout, which happens frequently (PG&E, SRC grounds maintenance, etc.) it is very dangerous. There is only room for one car to pass the parked truck. Vehicles turning into the road from Fruitvale are often traveling fast and frequently cut across the corner. A car exiting and going around the parked truck is at risk and neither car sees far enough ahead to prevent a collision. In addition, some SRC employees drive much too fast on that road, particularly if they are a few minutes late to work. The situation there with lots of large trucks and heavy equipment carriers will be a nightmare for those of us who live on San Marcos Rd. and have no alternative but to use that road each day.

Quality of Life: I know this is not a specified EIR issue but there must be some acknowledgement of the impact of the combination of loss of recreational resources, loss of aesthetics, failure of land use and planning, risk of hazards, dramatic loss of air quality, loss of more than 45 "protected" and/or heritage trees (biological resources) and an exponential increase in noise and vibration, on the current elderly residents of SRC. A few years ago, at SRC's invitation, my wife and I attended an open house lunch – marketing event for prospective new SRC residents. The quiet, the beauty and the serenity of the campus and its safety were prominently marketed, along with the recreational activities, including the putting green, the bocce ball court, etc.. For almost all SRC residents, those were among the most important factors in their decision to move to SRC for their remaining years. SRC's proposal would take those things away from residents for three to six years. For some residents those will be the last years of their lives, spent in noise and dust and fear. That is simply "bait and switch", and unacceptable.

Biological Resources: The PRS proposal will destroy 46 protected and/or heritage trees, primarily oaks and redwoods, some over 100 years old. They cannot be replaced. Making PRS plant a large number of even 24-inch boxed trees is wholly inadequate. The beauty, the shade, the wildlife habitat will not be comparable even 30 or 40 years from now. Some mature trees absorb 10 to 50 TONS of CO2 per year. The Preserve proposal will save all those trees.

Many Saratoga residents have wanted to build or do an addition only to be told that they cannot remove a protected tree. One tree. If PRS can destroy 46 protected trees it will further the cynical view that there are two sets of rules in Saratoga, one for developers and the other for regular homeowners.

There is an important riparian corridor on the SRC campus and many varieties of wildlife use that corridor. I have seen a wide variety of birds and animals myself on occasional walks through the campus. If most of the center of the campus is in the midst of long-term construction for years, per the PRS Proposal, much of that wildlife may abandon use of that corridor. If, instead, only one area of the campus is under construction, per the Preserve proposal, the wildlife may well find other routes around that one area but still use the riparian corridor.

Air Quality: The last SRC expansion created serious air quality problems for those of us on San Marcos Rd.. We had dust and dirt on everything outside for several years. Our patio furniture was always dirty. Our swimming pool needed resurfacing. Other neighbors had the same issues. The Preserve proposal moves all of the construction from the part of the SRC campus closest to us, to

Some SRC residents use oxygen. Others have less severe breathing problems, but breathing problems nevertheless. The PRS proposal will put most of the construction in the center of the campus, where the airborne dirt and dust will have the most effect on the most SRC residents. The location of the construction in the Preserve proposal would substantially mitigate this problem.

Noise and Vibration: One of the San Marcos Rd. residents (Nicolai) spoke at the scoping meeting and described the vibration inside his house when trucks at SRC go over the two speed bumps near his house. My family still remembers the years of intrusive - and seemingly almost constant - noise from trucks and heavy equipment when SRC did its last expansion, and we are more distant from the SRC road than Nicolai is. Once again, the Preserve proposal would have a clear and substantial advantage because it would move most construction to the part of the SRC campus farthest from us and our San Marcos Rd. neighbors.

That same advantage would be true for the SRC residents. Make no mistake: they will suffer negative consequences if this construction is done in any manner, but moving the construction to the edge of the campus would strongly mitigate the impacts of noise and vibration on most current SRC residents.

Hydrology and Water Quality: The San Marcos Rd. homeowners raised this issue repeatedly when the last SRC expansion was undertaken. Our road and our homes are lower elevation than the SRC property and we were concerned with runoff, particularly since the expansion meant parking lots and other impervious coverage near our road and properties. The PRS assurances turned out to be meaningless. Nitin Jain's property (corner of San Marcos Rd. and the Campo Calle cul-de-sac) has had serious problems with runoff from SRC, particularly after heavy rains. That is after a prior owner of that house installed an expensive drainage system all the way around the house's perimeter. Closer to Fruitvale on our road, there is a location that has had runoff from SRC frequently, for years. We have personally reported that to PRS management on several occasions, with no response. That runoff is likely the result of an underground spring on the SRC campus that has never been located or dealt with. No matter which alternative is chosen, we request that SRC, as part of any new construction, be required to survey all underground springs on their property and develop a comprehensive, site-wide hydrology plan. Otherwise, new construction sites, under the PRS proposal, may unearth additional springs. More construction on our side of the campus will exacerbate our runoff problems from SRC. The Preserve proposal would separate us from the new construction and be less likely to create additional hydrology issues for our road and homeowners.

Recreational Resources: The SRC residents currently have access to a lovely park-like setting in the center of the campus, with a putting green, a bocce ball court, a horseshoe pitch, seating benches and walking paths through the gardens in that area. The PRS proposal will destroy all of that and replace those recreational resources with ... NOTHING. That is unfair to the residents who chose to move to SRC in partial reliance on those resources and facilities. It also diminishes the attractiveness of the campus for the larger surrounding community. Obviously, the Preserve proposal saves all of those recreational resources.

Tribal Cultural Resources: When we first moved to Saratoga, our children were little and used to play at the old community gardens on the Oddfellows property. They and their friends often found Native American artifacts, most often arrowheads. My memory is that at one time there was discussion of a Native American burial ground on the property, but I am not sure. Perhaps the EIR done for the SRC last expansion would be helpful in that regard. If there are such issues, it would seem obvious that the PRS proposal, which involves excavating several new sites on the campus, would be far more intrusive than the Preserve proposal, which works with existing building sites.

Population and Housing: The PRS proposal would site the 50+ new independent living units in three separate and free-standing buildings. The Preserve proposal would locate all of those new units in a single building. Some residents have mobility issues. Bad weather can also restrict residents' outdoor movement. In short, a single building is a better housing alternative for the new units than three separate buildings because it is more likely to build a better sense of community and facilitate relationships among and between residents of the new units.

Wildfire: Our area is far from immune to wildfires. We know that now even if we didn't prior to the last few years. A wildfire burning in the heavily treed riparian corridor could easily

necessitate evacuation of the entire SRC campus. Even if the buildings were not burning – which they could – smoke inhalation could quickly become life threatening. An earthquake could also force evacuation, for that matter. It would be faster and easier to evacuate residents from one building (Preserve proposal) than to evacuate the same number of residents from three separate, non-contiguous buildings (PRS proposal).

Geology and Soils: This area is fraught with unstable soils, moving landslides and the like. A geological survey of the sites identified in both proposals is a necessity. It is likely the Preserve proposal, using two already established building sites, will involve less geological risk than the PRS proposal, dependent on three new sites.

Greenhouse Gas Emissions: Please see discussion of trees in “Biological Resources”, above.

Additional: When the last SRC expansion occurred, The San Marcos Rd. residents negotiated with PRS over several issues. One of these was the construction of a six ft. wall (cement block or something like freeway walls) down the median between San Marcos and the Oddfellows road. We argued we would need that to cut down on noise and air pollution during construction, and then ongoing noise after construction. I was personally involved in those discussions. PRS was initially amenable until the last moment, when it was clear they would get approval. Then they said categorically “No”, saying bushes in the median would be adequate. They were wrong in every way. The construction noise and dirt were a years-long disaster. The bushes are no help with ongoing noise from the SRC delivery trucks, some very early morning. SRC workmen and other employees, on their way in or out of the property, through food containers and beer cans in the bushes, which are left untended until PRS wants something from the city, like now. If any proposal for expansion is approved, we request a condition requiring PRS to construct a permanent, block, stone or ceramic six ft. wall in that median to mitigate our air quality and noise impacts.

That wall would also eliminate a long-standing problem with light spill from SRC. At the last expansion, PRS installed very bright walkway lights from Fruitvale to the old lodge building, every few feet along the Oddfellows road. Besides being extremely energy wasteful, those lights stayed on until late at night and shone directly into the front windows of the houses on our road facing San Marcos. Years ago, we asked prior SRC management if they would remove two-thirds of the bulbs, leaving one fixture in three working, which provided more than enough light for safety. That was an acceptable solution for a number of years, until PRS decided they wanted the road lit up like a Christmas tree again, without consulting any of us. A wall will fix that problem as well as others.

If you have questions or need additional information about any of this, please contact me directly.

Regards-
Jeff
Jeffrey A. Schwartz

From: [Cynthia Richardson](#)
To: [Rawnsley, Emma](#)
Subject: [EXTERNAL] FW: SRC Expansion Plan Environmental and Safety Concerns
Date: Thursday, March 31, 2022 12:52:26 PM
Attachments: [image001.png](#)

For your information.

Cynthia Richardson | Project Planner

City of Saratoga | Community Development Department
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From: Debbie Pedro <dpedro@saratoga.ca.us>
Sent: Tuesday, March 29, 2022 3:47 PM
To: 'nsilberman@gmail.com' <nsilberman@gmail.com>
Cc: Cynthia Richardson <crichardson@saratoga.ca.us>
Subject: RE: SRC Expansion Plan Environmental and Safety Concerns

Hi Nathan,

Thank you for your email. I am sharing your comments with project planner Cynthia Richardson (cc'd here). If you have any additional questions or concern, please feel free to contact her directly.

Have a great day!

Debbie

Debbie Pedro, AICP

Community Development Director
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From: nsilberman@gmail.com <nsilberman@gmail.com>
Sent: Tuesday, March 29, 2022 12:10 PM
To: Debbie Pedro <dpedro@saratoga.ca.us>
Subject: SRC Expansion Plan Environmental and Safety Concerns

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

My name is Nathan Silberman, and I am a new resident of SRC. I assume you already have heard numerous comments from residents and the Preserve SRC group, related to the negative impacts associated w/ the PRS management company's expansion plan. It is my opinion based on engineering and environmental considerations that their plan is incomed by multiple environmental and safety impacts that deserve the particular attention of the EIR investigator. Here are some of my key concerns to be evaluated by the city EIR experts: .

Transportation and Safety

Considering the increase in vehicular traffic from staff, residential and visitors, in addition to traffic generated by the eighty [80] residential units envisioned by the City's new housing quota for the Fellowship Plaza project... the management plan is deeply flawed in its inability to deal w/ negative transportation impacts resulting from this growth. We ask that the EIR undertake a complete reappraisal of the traffic impacts of ALL growth associated with both SRC expansion and that of Fellowship Plaza. The PRS expansion plan has not provided a plan for Residents Self Emergency evacuation by personal vehicles. This applies for cases of serious Earthquake as well big forest fires. The traffic report by Hexagon consultants is flawed in the sense it does not address at all emergency traffic during construction and afterwards, it also uses traffic models that are inconsistent with SRC location and traffic characteristics.

- Peak traffic flow was measured at 7–9 AM and 4–6 PM; however, peak hours at the SRC campus and when the school is in session are between 2:45 and 4 PM. West Valley College has peak traffic throughout the day when classes change. During these peak hours, traffic on Fruitvale Ave. is extremely congested, much worse than reported in your study (pages 1 and 4). The study results are irrelevant because of inaccurate peak hours.
- The theoretical Poisson distribution model used is inadequate because at peak hours, all the cars are there at the same time.
- The Poisson distribution also fails to work for emergencies. In these cases, the Theory of Constraints model, in which the speed or the rate of cars is determined by the slowest bottleneck, is more applicable. For example, in case of emergency such as earthquake or fire, all cars on campus would need to evacuate to a safe place. The rate of vehicle movement would be determined by speed over the bumps (2–4 mph), backing up cars on the streets that have stop signs at Odd Fellows Drive. In addition, cars exiting from San Marcos often fail to stop at the Odd Fellows Drive roundabout!
- Re: statement on p. 1: "*There are no approved or under-construction projects within the project vicinity.*" Traffic studies should be made while there is construction in this area. Recently there were quite a few construction projects along Fruitvale Avenue

from Allendale to Burgundy Lane. One could see dump trucks and cement trucks blocking the road. This was for just one or two houses. Imagine the impact of construction for five buildings at the Saratoga Retirement Community campus!

- Also re: p. 1: The amount of increased traffic should include both the increased number of residents and the increased workforce, as there will be a 50% increase in both numbers. The traffic study does not reflect these increases, instead estimating fewer than 100 net peak-hour trips. What is the basis for this?
- Re: statement on p. 17: "*Vehicular access to the site is provided by four main driveways.*" To clarify, all four driveways share one incoming lane, Odd Fellows Drive, a narrow, two-lane road with traffic bumps. Access to the site after the new construction will be very congested, particularly at the junction of Pavilion Circle and West Cottages Lane, where entry to the new Meeting Room building and the entrance to the Building A underground parking garage meet. This junction is already a problem because it is heavily used by big delivery trucks, garbage trucks, and pick-up trucks all day at the receiving dock. The entrance to the Building A underground garage directly across from the receiving dock on Pavilion Circle is most unsafe. When the new Meeting Room building is complete, there will be additional pedestrian traffic, posing a real hazard. The traffic report does not address this issue. Because Odd Fellows Drive is a public easement, there will be more pedestrians walking along it in front of Buildings B and C. Both buildings have parking entrances from the road, increasing the risk for elderly pedestrians, even when walking on the sidewalks.
 - On p. 17:, the report describes all added stop signs at each of the main access roads, but it gives no estimate of evacuation time if each car must stop at the stop sign when there are more than 150 cars trying to get out to Fruitvale Avenue. It would pose a major traffic jam and unsafe evacuation.
 - Re: statement on p. 21: "*The total number of employees working on the campus is 294 with a potential future reduction of 6 employees working in the Skilled Nursing Building, which will reduce the total number of employees to 288.*" This is inaccurate accounting and fails to include the 75 additional Independent Living residents and 75 more employees.
 - Re: statement on p. 21: "*The employees typically arrive and leave outside commute peak hours.*" Why is peak traffic measurement not done during SRC employee commuting hours? The current measured peak periods of traffic time are irrelevant, erroneous, and misleading. A realistic calculation and model are required
 - Re: p. 8: Vehicle queuing data is invalid as it was not collected at peak times when school discharges or when West Valley College classes change.
 - Re: p. 10: Trip generation during project: An estimated 28,600 cubic yards of dirt will be exported from the construction site. This means 2,860 10-cubic-yard truck loads and about 6,000 trips of 10-

cubic yard trucks on the streets near the campus. Add trips by cement trucks to that. Saratoga Avenue, Highway 9, and Highway 85 will be congested. The traffic report is irrelevant when they use the Senior Adult Housing data. We are talking about *major* construction lasting several years.

- Re: p. 21: Loading zones: The receiving dock behind the Manor is constantly busy location, with large garbage trucks, large food delivery trucks, and smaller delivery and dumpster trucks all day long. It is false to say “*do not receive recurrent deliveries for goods by truck,*” as stated in the report. Truck deliveries occur every day, and they need loading spaces. Traffic problems will be exacerbated by the new underground garage entrances and the pedestrian walk from the Meeting Room building to Building A as well as by cars traveling on Pavilion Circle. All this added traffic and congestion will make the junction very dangerous for both cars and people.
- The City council has approved 80 additional units at the Fellowship Plaza and 52 additional units at the Saratoga Retirement Community(SRC) campus in the next 8 years housing elements plan.
 - These additional units, will add an estimate of at least 250 people. (130 from Fellowship plaza and 120 from SRC including staff members). How are you going to evacuate these people in their cars in case of emergency?
 - The current Chester Ave. fire exit is for fire engines in and out of SRC, and the second exit is for Fellowship plaza residents. The SRC exit at Chester is not suitable for small cars with low ground clearance. How are these exits going to be used by residents and what is the impact on the Chester Ave. neighbors.
 - In case the Chester Ave. is not available what is the impact on the San Marcos traffic ? The emergency evacuation will be substantial with the current almost 500 residents and staff at SRC, and the additional 52 units of IL units of 120 residents and staff, and the residents at the Fellowship plaza of 400 or so. (current Fellowship plaza has 150 units i.e. 250 people and then 80 more new units i.e. 130 residents).
 - All the Skilled nursing facility patients need ambulances to transport them that will add to the IL residents traffic and slow it down!!. What is the City’s plan for evacuation?

Public Services and Recreational Resources

Given the magnitude of population growth envisioned, the management’s plan does not address the need for increasing the availability of outdoor easily accessible recreational facilities. On the contrary, because their building A will occupy the Historic Park, the campus will lose the current Bocce ball court, horseshoe range, putting green and pick-nick facilities. Which means that instead of recreational resources keeping pace w/ residential growth,

resources are in fact diminished. This is an unacceptable impact on campus residents and their quality of life.

Furthermore, during construction, the total gridlock generated by the nature of the project's being scattered throughout the campus, will cause vehicular access to become completely congested and inoperable. Truck traffic, heavy equipment being mobilized in addition to staff, residential and visitor traffic will cause transportation to come to a standstill. This too is an unacceptable environmental impact.

Story poles:

The City ordinance requiring story poles has a recent amendment that allows developers to substitute alternative visual methods in place of traditional poles. Unfortunately, this adjustment to the original rule thus allowing of alternatives to story poles does not offer criteria for granting exceptions to this important requirement. The lack of specifics has the effect of permitting developers to attempt closed door negotiations w/ senior City staff to dodge the visual impact that story poles have on viewers. This circumvents the intent of the law. Any such negotiations must be conducted in the light of day in front of a public hearing.

PRS alternative offered, is nothing more than a piece of SOFTWARE MANIPULATION OF VISUALS. There are no dimensions or scales in their presentation and some of the views are clearly distorted in order to provide "Improved Views". PRS claims that Story poles are not feasible, are baseless, and the city should review the analysis provided by the residents using Google Earth View that proves that story poles are totally feasible and necessary to gage the real size and impact (visual and practical) of the proposed buildings.

Environmental Impact During Construction:

Construction traffic, noise, and air quality impacts on the daily residents' lives and the neighbors' have to be evaluated. **Dust, noise, and air pollution** generated by exporting 28600 cubic yards of excavated dirt i.e. over 6000 trips of 10-cubic yard of dirt trucks, cement trucks, bulldozers, backhoes, trenchers, graders and other heavy construction equipment over a period of several years need to be considered. The real health and safety hazard to the elderly residents walking and living on site must be evaluated. A quantitatively acceptable level of these above mentioned pollutions must be described and how they are controlled and kept within the acceptable levels should be specified.

Best Regards,
Nathan Silberman
nsilberman@gmail.com

Saratoga, CA

Nathan Silberman

nsilberman@gmail.com

Saratoga, CA

Rawnsley, Emma

From: Cynthia Richardson <crichardson@saratoga.ca.us>
Sent: Monday, December 20, 2021 9:34 AM
To: Rawnsley, Emma
Subject: [EXTERNAL] FW: SRC Expansion Plan

FYI

Cynthia Richardson
Consultant Planner
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-----Original Message-----

From: Anthony Vandersteen <anthonyvann@att.net>
Sent: Sunday, December 19, 2021 10:40 AM
To: Cynthia Richardson <crichardson@saratoga.ca.us>; Anthony Vandersteen <anthonyvann@att.net>; Bob Bergland <rbergie@aol.com>; Colin Whitbey-Strevens <colin@pandcws.com>; Dick du Bridge <pddubridge@gmail.com>; Don & Jan Schmidek <dis6933@gmail.com>; Tsing Bardin <Tsingt@b@gmail.com>; Mike Griffin <jazzbuff@comcast.net>
Cc: Bobbie Vandersteen <anthonyvann@att.net>
Subject: SRC Expansion Plan

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Hi Cynthia, this is Anthony Vandersteen, and I wanted to get my 2 cents worth in to you from my perspective on the current Expansion Plan situation.

We moved here in 2016 and specifically asked if they planned any new development, and were told no, other than a possible minor staff building at the staff parking lot. Having spent \$540,000 for the entrance fee, the news in 2017 came as a huge shock. The PRS plan has not changed from the original in 2017, and is literally being shoved down our throats. They have refused to budge even though we have presented an excellent Alternative Plan, which does all they need, but with far less trauma to the residents at SRC. I'm sure you know all the arguments by now, and we can only hope you treat us equally with PRS in judging the two plans. PRS are situated in Oregon and have little interest in the quality of life of the residents at SRC or in Saratoga in general. For them it is purely dollars that influences their decision. We have never understood how the owners of SRC, ie The Odd Fellows, can quietly accept such ruination to their very own property, one they are supposedly proud of. Maybe they have yet to fully understand the overall affect of this destructive plan. Apparently they also have little to no interest in the aesthetic values of how the whole place looks, or the value of respecting the heritage of the wonderful old Manor building, and the associated views which we all love. This is your decision of course but we sincerely hope we have a fair chance of having our plan accepted.

My particular axe to grind is the multi-year construction trauma associated with a huge project like this. I have much experience with construction sites as I spent 15 years working for Habitat for Humanity in the South Bay, at maybe a dozen different sites. They are messy, dirty, dangerous places, and absolutely not the place where you want a lot of

elderly people. I had a couple of serious falls during this time, one of which landed me in hospital. The noise alone will be really objectionable sometimes, and at the locations planned for the PRS sites they will be impossible to avoid. Huge deep holes for the underground parking lots and foundations will be very hazardous, which may well flood in the wet season, and will be impossible to screen from the residents, due to the central location of most of the sites. This fact alone heavily favors the Alternate Plan as this is all situated on the eastern border of the campus, and is fairly easy to screen with wooden barriers, thus keeping the residents completely away from the heavy actions.

We know the Alternate Plan is far more popular to all the residents here than the PRS plan. During the EIR meeting you heard a sampling of views from residents and neighbors alike, all expressing the overwhelmingly negative feelings we all have about the PRS plan. The tree issue alone should be enough to convince anyone, but we all recognize the power of a large corporation, and need as much help as we can possibly get. I know you are primarily concerned with the city's need for more housing, but sincerely hope you can favor the side of the residents who live in your city.

Thanks very much for your fair treatment of the Alternate Plan so far, and for all you do for the city.

Sincerely Anthony Vandersteen

Rawnsley, Emma

From: Cynthia Richardson <crichardson@saratoga.ca.us>
Sent: Friday, December 17, 2021 3:12 PM
To: Rawnsley, Emma
Subject: [EXTERNAL] Fw: Comments for scoping meeting

FYI



Cynthia Richardson | Consultant Planner
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From: Anthony Vandersteen <anthonyvann@att.net>
Sent: Friday, December 17, 2021 3:02 PM
To: Cynthia Richardson <crichardson@saratoga.ca.us>
Cc: Bobbie Vandersteen <anthonyvann@att.net>
Subject: Comments for scoping meeting

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Hallo Cynthia,

I am a 5 year residents of SRC and I agree with all of the comments that I heard during the scoping meeting. I would like to make a plea on behalf of the other "residents" who share our campus. We have a pair of red shin hawks who use the tops of our redwoods to look for prey, we have large family of woodpeckers whose drilling can be heard in many of our large trees, we have many humming birds who enjoy the nectar that residents provide for them. Of course we also have many pigeons, crows and small finches who enjoy our campus. Deer wander through in the evening and raccoons, skunks, rabbits, and possibly coyotes and a bobcat are on the lookout for food while we sleep. The construction of large buildings with big noisy vehicles on our campus will result in much of this wildlife disappearing and I really protest on their behalf. And while I have your attention I would like to say that I am appalled by the plan to cut down so many beautiful trees that were here before SRC was even thought of. Trees are one of our weapons against climate change, we should be planting thousands more in Saratoga, not removing them.

Thank you

Robina Vandersteen

From: [Anthony Vandersteen](#)
To: [Cynthia Richardson](#)
Cc: [Bobbie Vandersteen](#)
Subject: SRC Expansion Plan
Date: Tuesday, December 21, 2021 5:06:24 PM

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Dear Cynthia,

I have another concern about the Expansion Plan and that is that our present kitchen staff struggle sometimes making food fast enough to serve residents in the dining room and often we wait quite a long time to be served. Our kitchen is quite small. So far PRS has not offered any concrete plans for a second kitchen which would be needed if they add up to one hundred new residents to our campus. There has been talk of turning one of the Manor apartments into a “bistro”, and how we can always go over to the tiny “deli” in Assisted Living but most residents scoff at these suggestions as being totally inadequate. We are very concerned that we shall be treated like a cruise ship and told that we have to choose a time.....4.30, 5.30 or 6.30 and that is when we shall be able to eat. We already have too many rules and do not relish the idea of more. It is a lot like the PRS plan for when they build over our Bocce Ball court (used by almost 50 residents) we have been told that they “will find somewhere else to put it.” Well there isn’t a large enough piece of flat land left on campus if they put up the planned apartments.

I hope you are not too fed up with hearing from frustrated residents but this really is a big deal for us.

Thank you Robina Vandersteen