



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 PreserveSRCampus.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:

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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**.

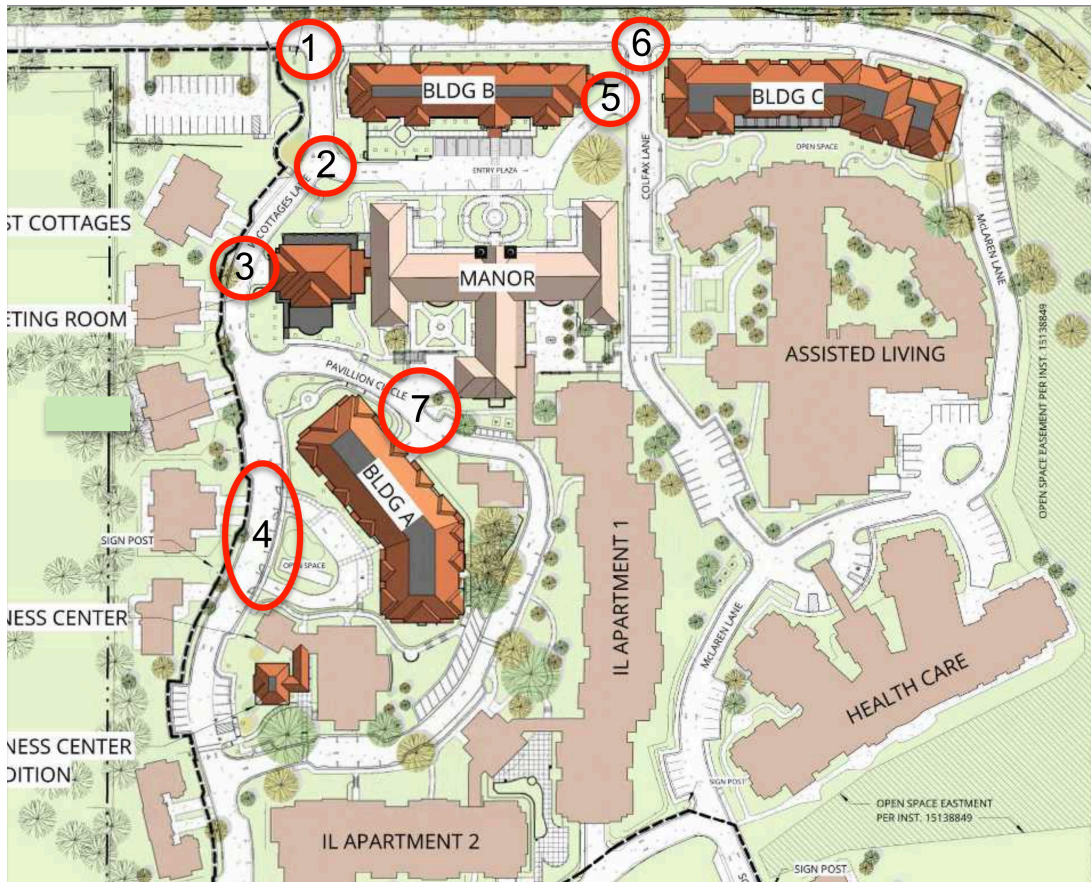
I. The Big Picture

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](https://www.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. Wrentit
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
NOTE: EARTHWORK QUANTITIES SHOWN ARE APPROXIMATE. IT SHALL BE THE CONTRACTOR'S RESPONSIBILITY TO INDEPENDENTLY ESTIMATE QUANTITIES FOR HIS/HER OWN USE.						

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, 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 perimeter 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. The city was scheduled to hear an EIR Public Scoping Meeting on Dec. 9 over Zoom regarding the current proposal.