

# Appendix A – Written Comments and Transcript of Verbal Comments

Part One:

- Form Letters

*The following letters are generic copies of comments that were each sent by multiple people, and are included in Part 1 of Appendix A for easy reference. Actual copies of the form letters as sent by individuals (some with additional comments included) are coded by last name of the commenter and included in Parts 3 through 7 of Appendix A.*

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To the EIR consultants, the Planning Commissioners and City Council,

1.1

Saratoga Retirement community is already solvent, in the black!

Yes we need improvements to our Health Care Center, but we don't need the enormous building projects proposed by PRS.

This proposed project will not only negatively affect the residents for the rest of their lives, but all our neighbors will be subjected to noise, pollution, traffic, & disruption for years.

And the result? **More money for PRS** & a remaining campus of buildings—not mature trees, not a park, not flat outdoor space for the residents. Welcome to New York City.

To the EIR consultants, Planning commissioners and City Council,

2.1

We are residents at the Saratoga Retirement Community. We read the DEIR and found that the Residents Alternative plan, aka Alt. 1 in the DEIR is mis-represented. The EIR consultants used the Ankrom Moisan architect firm for the interior design Table 4.4-2. The design did not use the footprint that the Residents' Alternative plan proposed Table 4.4-1. We want to challenge this gross mistake and the consequences.

The residents submitted their alternative plan on June 21 2021 and updated on March 21, 2022 to the City of Saratoga for consideration and inclusion as an alternative in the Environmental Impact Report proceedings for the expansion of the Saratoga Retirement Community project submitted by Pacific Retirement Services (PRS).

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

We have specifically asked "We would welcome the opportunity to discuss this alternative plan further with you and others at your earliest convenience." We have included our website in the submission [http://www.preservesrccampus.org/Residents Alternative Submission for SRC Expansion 20210621.pdf](http://www.preservesrccampus.org/Residents%20Alternative%20Submission%20for%20SRC%20Expansion%2020210621.pdf)

But after more than two years, EIR never came back to us for more information, instead they used the PRS's architectural firm to sketch something which is completely different from our plan.

The new plan adds a third story, requires up to 12 feet of additional excavation, and replaces the proposed auditorium with a much smaller meeting room. This change was done without consulting Preserve SRC, and Preserve SRC would never have allowed the change. For the reasons stated below, Preserve SRC feels that the DEIR needs to be changed to evaluate Alternative 1 as it was submitted and not as it was misrepresented by AECOM using the Ankrom Moisan design.

2.1  
Cont.

The square footage at the current Health Center provides enough space for a two-story building 52 apartments, a meeting room, and underground parking. The three-story building substituted by AECOM/Ankrom Moisan requires a 20-foot foundation depth, which requires significant additional excavation over the Preserve SRC proposal.

Although the AECOM/Ankrom Moisan-proposed three-story building might exceed the height of current treetops, the two-story Preserve SRC Building D would not exceed the height of any treetops.

The DEIR incorrectly calculated parking at the Preserve SRC proposed Building D. The Preserve residents' plan provides 20 surface parking spaces and 90 underground parking slots; not the 77 spaces stated in the DEIR. Ankrom Moisan did not take advantage of the current elevated empty space under the building with heights varied from 12 feet to 0 feet, as we have planned as part of the underground parking.

Because the Preserve SRC Building D preserves the footprint of the current Health Center, no additional trees would be removed during reconstruction. The AECOM/Ankrom Moisan-proposed Building D requires the removal of at least 48 trees and possible disruption of adjacent riparian areas.

Using the same footprint as the existing Health Center means no change to soil instability. No known soil instability has been reported since 1999.

Because there will be less excavation and less new construction, construction-related traffic its impact will also be much less than the current DEIR anticipates. Estimated maximum vibration levels and similar impacts must also be re-evaluated based on the actual Preserve SRC proposal.

**Our Residents' Alternative plan uses the exact footprint as the existing Health Care Center. The environmental report from 1999 studied this exact site . We do not agree with the current DEIR analyses because they used the wrong data. It is imperative to make the corrections in the current DEIR. Many environmental impacts reported in the current DEIR should be mitigated to Less than significant according to the 1999 report if they used the same footprint. The DEIR must be changed to evaluate the impacts of Building D as originally proposed by Preserve SRC.**

2.1  
Cont.

Additionally, the Preserve SRC proposal for Building C is also inconsistent with the footprint shown by AECOM/Ankrom Moisan in the DEIR. The Residents' proposed Building C would not require modification of Colfax Lane, and does not require removing the redwood tree and oak tree at the corner of Colfax and Odd Fellows lane.

2.2

The Residents' Alternative plan is the ONLY plan which addresses how to take care of the Health Care Center patients during construction. None of the other plans even mentioned it.

The Residents' Alternative plan is the only plan which addresses the emergency evacuation access for the Health Care Center patients, because of the proximity of the new Skilled Nursing facility.

2.3

Preserve SRC also feels that financial objectives of the Project Applicant, while worthy of consideration elsewhere, should not be considered in an Environmental Impact Report. Inclusion of these comments in the DEIR is inappropriate.

If the financial is considered, we have done a detailed analysis based on square footage costs for both apartment and for skilled nursing facilities. After including the interest (or penalty) for no income during the construction of the new skilled nursing building, we still came out with a figure very comparable to the PRS plan of 4 building square footage cost. However, PRS has refused repeatedly to give any cost estimate nor has justified their building the 52 apartment units for renovating the 52 private room and upgrading the current Health Care Center. Our Saratoga Retirement Community does NOT need the 52 new apartments to support our 18-year history of healthy finances.

3.1

Bullet points for Skilled Nursing issues

- Fails to address the requirement for a health center while the current one is remodeled.
- Not to mention completely ignoring the residents plan for building a new one while continuing to use the old one before replacing it with a residential building.
- No mention in the details of renovating Skilled Nursing, where is the schedule and how they will do it while the patients are in the nursing home.
- What is the environmental impact on noise, vibration, dust during construction?
- The length is said to be 2 years, are these rooms renovated in sequential or in parallel? We had very bad experience while the management was doing the balconies repair in 2018-2021. It took 9 months to repair each balcony while residents had no natural light, no fresh air and cannot use the terrace. The repair was done as one block at a time so the whole block of balconies were under this kind of situation for 9 months.



To the EIR consultants, Planning Commssioners and City Council,

4.1

**Here is a very important issue which has not been studied thoroughly. The consequence is significant.**

**Emeregecnny Evacuation needs more study**

- Emergency Evacuation on SRC campus, which also involves our neighbors on Chester Ave. San Marcos Lane and the Fellowship Plaza, needs more study. It is a a basic health and safety issue.
- How to evacuate the Skilled Nursing patients during emergency evacuation, when at least 40 ambulance has to come to campus. How can the independent Living senior residents driving themselves out in this case? They are all expected to evacuate using their own vehicles according to the management per instruction from our administration ( June 21 2023)
- The gates on Chester Ave. for the 80 additional Fellowship plaza apartment and the additional 52 SRC apartments are inadequate for emergency evacuation. These gates will not be able to handle the ambulances, the fire trucks and the additional cars. Even now before the constructions, it is already a real threat of safety and health. The report does not have any detailed study and do not have plans to mitigate the danger.

***Impact TRA-4: Project-Related Interference with Emergency Access***

*The Project could result in inadequate emergency access. Mitigation: MM-TRA-3a: Construction Traffic Control Plan*

The Project could result in inadequate emergency access. It has significant impact, not mitigated in the DEIR studies. Referring to Mitigation: MM-TRA-3a: Construction Traffic Control Plan





5.1

**EVERY SINGLE TREE YOU SEE**  
(INCLUDING THE HUGE PINE AT THE FAR RIGHT  
& THE 2 SYCAMORES ON THIS SIDE OF THE STREET)  
**WILL BE DESTROYED TO BUILD 1 ROOM NEXT TO THE MANOR**

**THIS IS NEEDLESS DESTRUCTION**  
**of our beautiful Gentle Giants**

Cynthia Richardson, Project Planner,  
13777 Fruitvale Avenue, Saratoga, CA 95070

Dear Planning commissioner and the City Council,

6.1 I came to live at SRC because it was by far the most beautiful senior living place around. As I look out my front window, I see beautiful greenery — large evergreens, a smoke tree, sycamore trees, crepe myrtle trees & more — many of them many years old.

If the expansion plan of PRS is approved, I will see none of these beauties. And I mean NONE. Every single one is destined to be hacked down. EVERY SINGLE ONE.

This is an unbearable loss. I (& the entire community) will lose the beauty, the shade, the oxygen, and the serenity that these lovely trees afford.

Please do not let this happen.

Thank you for listening,



To the EIR consultants, the Planning Commissioners and City Council,

Support for the Alternate 1 Plan  
at Saratoga Retirement Community

7.1 I implore you to stop the devastation planned by PSR to our beautiful Saratoga Retirement Community.

I understand that improvements are needed — and the Alternative 1 plan addresses all those needs. But it does not have the devastating environment impact that the PSR plan has.

We love our trees. We love our Historic Park. We love our paths thru our serene campus.

Please don't make our last years a living hell. Alternative 1 makes the necessary improvements without the devastating impact.

To the EIR consultants, the Planning Commissioners and City Council,

8.1

We residents here at Saratoga just love our bocce ball court located in our beautiful Historic Park. That & our putting green are our only outdoor games on campus. We also enjoy the chairs & picnic tables set up in that same park.

The large oak tree there was lost in a storm last year & it has not been replaced with anything — not even grass or ground cover. Why? Because the PRS Expansion project plans to eliminate this park entirely (our only park) to make way for more buildings.

If we wanted a campus full of buildings we would have moved to any number of more financially reasonable ones in the Bay Area.

Please help us save our green space.

August 6, 2023

Cynthia Richardson, Project Planner  
City of Saratoga  
13777 Fruitvale Ave.  
Saratoga, CA 05070

Dear Ms. Richardson,

9.1

The proposal to attach a Meeting Room building to the historic Manor building on the SRC campus is a wrong-headed plan. This iconic Mission Revival-style structure represents the heart of this community, whose purpose is to provide housing for the elderly. Its solidity and its classic design have set the style and provided the visual anchor to the community for more than 100 years. It has been recognized for its historic merit by the City of Saratoga. Of course, the setting of a historic building deserves as much protection as the building itself, since a building cannot be perceived without it.

The Manor's prominent setting confirmed the importance of its original purpose: the housing of elderly residents. In 1912, before social security and other social services, retirement homes were a new concept and filled a critical need. The Odd Fellows took seriously the care of their elderly members; this building replaced an earlier structure at a different location.

This handsome Mission Revival-style building is impressive for several reasons. First, its size and bulk fit the site, which was doubtless the premier spot on the property when it was built: the crown of a knoll that dominates its surroundings. The classical design of the building is achieved through its symmetry; adding a wing to its west side will forever destroy that.

Besides intruding on the Manor's setting, the current proposal to site the proposed Meeting Room on the downsloping west side of the Manor would also eliminate one of the few spaces left on campus where there is greenery shaded by trees, an area that has no purpose but to please the eye and refresh the soul. Many mature trees will be sacrificed, at a time when the importance of the tree canopy is increasingly appreciated as a hedge against global warming.

The iconic building itself will not undergo significant changes under this plan (though one exterior wall will be pierced), but the proposed addition of the Meeting Room, dangling offhandedly from its west side, will forever ruin the aspect of a beautiful building, perfectly sited. Viewers will never again see its original perfection, try as they might. And when they drive up to SRC, their initial view of the Manor will include the large Meeting Room, obstructing the handsome white structure on the knoll.

Sincerely,

August 6, 2023

Cynthia Richardson, Project Planner  
City of Saratoga  
13777 Fruitvale Ave.  
Saratoga, CA 05070

Dear Ms. Richardson,

10.1

Among the many concerns we residents have about the PRS Expansion plan, one is more esthetic, less rational, and difficult to quantify: the threat to our historically and architecturally significant central building, known as the Manor. This iconic white stucco-clad building is a glory to behold--graceful and inviting in spite of its bulk, proud with its two bell towers and arched colonnades. The building itself will not undergo significant changes under this plan (though one exterior wall will be pierced), but the proposed addition of the Meeting Room, dangling offhandedly from its west side, will detract from the Manor's classic beauty. It will ruin the aspect of a beautiful building, perfectly sited on its plot.

This handsome Mission Revival style building is impressive. Its size and bulk fit the site, which was doubtless the premier spot on the property when it was built in 1912: on the crown of a knoll that dominates its surroundings. The building's prominent setting confirmed the importance of its purpose: the housing of elderly residents, which the Odd Fellows took seriously.

When the Odd Fellows developed this property in the early 2000s to create today's continuous care community, they took pains to respect and preserve the Manor and the style it set. Changes to the interior were made with care, and exterior alterations were minimal. Importantly, the purpose and use of all the new facilities continued to fulfill the Odd Fellows' original commitment to house the elderly.

Besides intruding on the Manor's setting, the Meeting Room's building site would eliminate one of the few spaces left on campus where there is greenery shaded by mature trees, which will be sacrificed.

Even if the new Meeting Room were to be sensitively designed to compliment the Manor, it will inevitably diminish the visual impact of that grand structure. A classical building is a style defined by symmetry, which will be forever abrogated. Future visitors and historians will never be able to see the Manor as we do; they will look and wonder why anyone was allowed to tack on such an appendage. Their only option will be to crop it out of their photos!

Sincerely,

## REVIEW OF DEIR FOR SARATOGA RETIREMENT COMMUNITY EXPANSION PLAN

11.1

**The question is not when will the next Pandemic hit, but what are we doing to prepare for it?**

As a lay person when it comes to very technical details, I reviewed the DEIR for the proposed expansion of the Saratoga Retirement Community (SRC) as best as I could. I found a huge **void** in the details for the Health Care Center (HCC) remodel other than reducing the 99 beds to 54 and converting all the rooms to private including private toilet and shower. It was disappointing since this seems the opportune time to learn from the all the studies done post covid and to design SRC HCC with details to mitigate the next pandemic.

The conversion of the semi-private bedrooms and baths to private is a good start but the vague construction schedule shows that as **phase four**. With recent studies showing that **shared** bedrooms and bathrooms helped enable the spread of the Covid pathogen, the priority for this conversion should be **Project #1**. ( See article in AARP,1/3/2023 by Emily Paulin).

11.2

The following are other details that were **missing in the SRC DEIR** for the HCC:

**Emergency Response:** after reading all the possible road closures and road re-alignments and the fact that Emergency Medical Response (EMR) vehicles are very frequently on the campus day and night, it seems **urgent** that the Emergency Access Road **be built first!** This is the access from Chester Ave with a wide sweep to accommodate fire trucks onto Odd Fellows Drive. For years, residents have begged for this as San Marcos/Odd Fellows drive in the only way in and out of the campus. With all the daytime truck congestion and debris removal during the proposed construction, there needs to be a safe way for fire and emergency vehicles to access the campus.

11.3

**Air Quality, Noise, and vibration analysis** were all missing for the interior environment that in-patients in the HCC would be subjected to during the remodel. While the DEIR concerns itself with the exterior environment, no one has examined what the in-patients must endure trapped in their beds during this construction. In an important study done in Cleveland Clinic and reported in The Cleveland Clinic Journal of Medicine, October 1, 2019, Amjad Kanj MD et al reported in article, "**What are the Risks to Inpatients During Hospital Construction or Renovation**", found that " Hospital construction ultimately will serve the interests of patients but it also can put in-patients at risk of mold disease, Legionnaires Disease, sleep deprivation, and exacerbation of lung disease."

11.4

**Solar panels and Water Saving standards** were also missing for the HCC remodel plans. There were plans for solar panels for other buildings as well as "Build it Green" ideas but nothing for the HCC.



11.5 **Impact MF-S-3 Direct adverse effects on human beings** inside a HCC that is being remodeled. There is a lot of analysis on the outside air, water, noise and vibration but nothing for “Sensitive Receptors” who are unable to move or relocate, trapped as such in their beds and bedrooms in a HCC that is being remodeled. An abled bodied resident can request a change of location if overwhelmed with noise , dust and vibration but no such options are available to the in-patient recovering in a HCC that is undergoing a remodel.

11.6 In Summary:  
**Build** the access road appropriate for fire trucks from Chester to Odd Fellows Road **first**.

11.7 If a new state of the art **HCC** is out of the question, then current in-patients at HCC must be re-located and the HCC must be **remodeled with latest Covid regulations**. This is the next in priority for the health and safety of SRC residents.

Thank you to the Planning Commissioners and City Council members and their staffs for making this whole comment process possible.

12.1

Dear EIR consultants, Planning Commissioners and City Council,

I am a resident in the Manor building of the Saratoga Retirement Community.

I oppose the building of the proposed Meeting Room. It will have a very significant impact on the Manor residents during construction.

The noise level is beyond the acceptable level as you noted in the DEIR report Table 4.5-6. Construction zone would generate noise levels of up to 95 dBA for the four west-facing units within the western wing of the Manor Building. 95 dBA is like fire alarms in our hallways!! This **would exceed** the FTA's recommended construction noise criteria of 80 dBA. Such loud noise is very disturbing and causes mental health issues. Particularly for long duration, not just a few minutes but many hours during the day and for many months.

The mitigation suggested that the noise is only during day time, so it will be quiet during after work hours. This report does not consider the seniors at all. We take naps and stay indoors most of the time during the day. These loud noise will be intolerable.

We come here to enjoy our last years peacefully and quietly and we paid an enormous amount of our savings to retire at this lovely place. Please do not build this Meeting room which is directly attached to the Manor.

We do NOT need it!

13.1

Open space has value beyond its use for recreation, socializing, or refreshing one's soul. It contributes importantly to how we perceive a structure or space intellectually and physically--whether it reads as gracious and inviting or cramped and mean, whether we want to pause in it or keep moving. It enhances the setting for whatever structure it frames, creating a pleasant showcase for man's handiwork. Open space around a town stimulates a rural feel; a tiny park in a busy city becomes a cherished refuge; a "good building site" provides space around a structure that enhances it, allows it to breathe. Thus, the slope before the Manor is critical to its perfect setting and is therefore valuable open space. Not by any stretch would that slope be described as a "good building site," just as the Odd Fellows Park would never be a choice setting for an apartment building. In either case, those proposed structures, with no open space, will appear hemmed in, shoehorned into their sites, which are too small for the structures designed for them. At the same time, their former value as open space has been squandered.

14.1

Dear EIR consultants, Planning Commissioners and City Council,  
I am a resident in the Manor building of the Saratoga Retirement Community.

I oppose the building of the proposed Meeting Room. It will have a very significant impact on the Manor residents during construction.

The vibration level during construction is expected to be substantially exceeding the applicable building damage threshold for masonry buildings such as the Manor according the Table 3.12-10 in the DEIR report. Vibration from heavy construction equipment and soil compaction from the weight of the new Meeting Room Addition on recently excavated ground could cause irreparable damage to the foundation of the historic Manor.

The suggested mitigation to minimize the damage to the Manor foundation is to use smaller equipment which might generate lower levels of vibration, yet the impact on human lives inside the Manor right where the Meeting room is constructed is totally ignored. Notification of such vibration activities as suggested in the mitigation will not reduce the impact on our lives. Where do we escape to? This is our home, we do not have other places to go; we live here and we would have to suffer through during the construction of Meeting Room.

If the said 3 months of grading/foundation work lasted more than 3 months, do the residents have any leverage on this time line? Similarly the 7 total months of construction seems to be unrealistic. What can the seniors residents do when the noise and vibration levels are insufferable and last so long? Please be humane, we did not move to a loud and disturbing construction zone.

We come here to enjoy our last years peacefully and quietly and we paid an enormous amount of our savings to retire at this lovely place. Please do not build this Meeting room which is NOT needed.

To EIR Consultants, Planning Commissioners and City Council,

I find the EIR studies are inadequate, here are my concerns,

- 15.1 1. Where is the parking tabulation? It should be included in the DEIR as it talked about parking many times, but there is NO clear comparison of parking spaces. Parking is listed as #10 In project objectives. How many parking spaces in Alt. 2 compared with the current parking spaces? How many surface and underground parking spaces? Where are they?
- 15.2 2. No mention in the details of renovating Skilled Nursing, even though it is the Project objectives #4. Where is the schedule and how will the renovation carry on while the patients are in the nursing home? What is the environmental impact on noise, vibration, dust during construction? The length is said to be 2 years, are these rooms renovated in sequential or in parallel? We had very bad experience while the management was doing the balconies repair in 2018-2021. It took 9 months to repair each balcony while residents had no natural light, no fresh air and cannot use the terrace. The repair was done as one block at a time so the whole block of balconies were under this kind of situation for 9 months at least. No compensation for the residents during the entire repair period. Is there any assurance that the renovation will be finished in 2 years? How do you enforce the schedule and the length of renovation? It should be clearly stated in the EIR. If the renovation is lengthened the environmental impact will be bigger.

Thank you for your attention,



Cynthia Richardson, Project Planner  
13777 Fruitvale Avenue  
Saratoga, CA 95070

16.1

I am a resident at the Saratoga Retirement Community.

We are strongly against building these apartment building right in the center of our campus.

For SRC, the Odd Fellows Historical park is equivalent to the "Central Park" In New York City. It is a safe outdoor area for us to stroll, for us and our neighbors to walk their dogs.

These paths are very accessible even for residents with walkers. We come out of our apartment and walk around to get sunshine and fresh air.



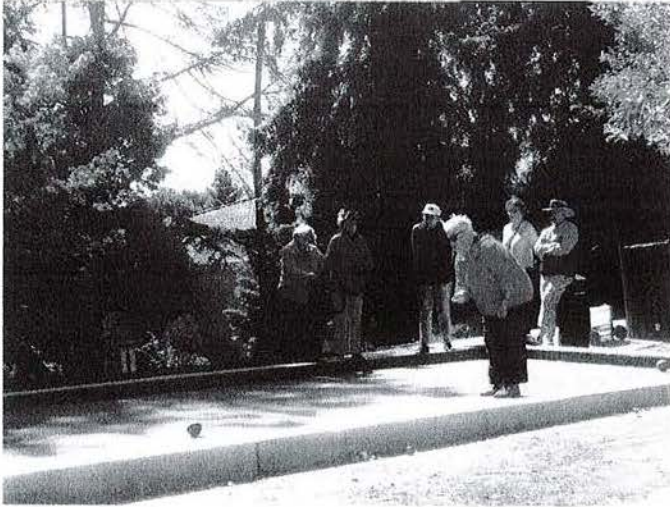
In contrast, the DEIR suggests that these campus walking paths and open space can be substituted by the nearby San Marcos Open space (p.3-260 DEIR). Can you imagine residents taking their walkers along the Odd Fellows Lane easement, walking along the roads without pedestrian paths, going up the hill to the San Marcos Open Space? Yes, it is only 300 feet to the southeast of the Project site, but that is "as the crow flies" distance. One has to climb up a steep embankment—inaccessible except by a 2.5-mile round trip along the road or by helicopter. This shows complete lack of understanding of the seniors' needs nor respect for seniors' quality of life.

Please do NOT allow the apartment building to be built on this open space.

Cynthia Richardson, Project Planner  
13777 Fruitvale Avenue  
Saratoga, CA 95070

17.1

Please do NOT destroy our Full-Size Bocce Ball court. The replacement proposed is only 2/3 of the current size. We do NOT want or need a 2-story apartment building on this site.



Over 60 residents regularly enjoy the games. We have many teams, for women, for men, mixed and some with staff and residents. It is a fun and healthy outdoor game.

This is our only outdoor recreation site. We, seniors need it for our mental and physical health.

Thanks you for listening,



Cynthia Richardson, Project Planner  
13777 Fruitvale Avenue  
Saratoga, CA 95070

18.1

I am a resident at the Saratoga Retirement Community

I enjoy playing Bocce with my neighbors every week, some times twice a week. It is a healthy and fun outdoor activity.

I am very upset that the Pacific Retirement Services has proposed a master plan to build a two-story apartment at the site of our Odd Fellows Historical Memorial park with its FULL- size Bocce ball court. The proposed replacement court would only be 2/3 of the current court.

Please do NOT build these apartments. The Bocce ball court is the most important outdoors facility. Over 60 residents regularly enjoy the games. Some of our senior citizens come to play even using walkers!



Cynthia Richardson, Project Planner  
13777 Fruitvale Avenue  
Saratoga, CA 95070

19.1

One of the reasons that I chose Saratoga Retirement Community is the attractive outdoor green space. The bucolic campus is one of the assets of the entire Saratoga City. Here seniors can relax and have fresh air.



I am against Pacific Retirement Service's building the two story high apartment which will occupy all the green space we have. Please do NOT build these apartments. This green space is an irreplaceable jewel. Thanks you for listening,



Dear EIR Consultants, Planning commissioners and Saratoga City Council

20.1 Today I asking you to please *block any proposal involving construction of the proposed meeting room appendage to the Manor building and Building A.*

The DEIR failed to address the environmental impacts on the local residents. Too often, the impact on nonresidents is given priority over the effect on those of us actually, daily, affected by this project.

20.2 Here are the reasons:

1. Obliteration of Odd Fellows Historical Park

Construction of Building A would cover up most of the green space currently designated as Odd Fellows Home of California Historical Park, dedicated with a plaque on the site in August, 2008. The proposed meeting room addition to the Saratoga City Heritage landmark Manor building, also a part of the Historical Park, would permanently destroy the architectural symmetry of the beautiful Manor. Together, the new buildings would completely wipe out these important historic resources. The DEIR needs to include the cultural and historic impact of the development covering over the entire Historical Park.



20.3 2. Loss of Mature Trees and Green Vista

Construction of Building A and the meeting room would require the removal of every protected, mature tree in the Historical Park. The expansive green space would be replaced by a huge two-story apartment building. The DEIR states that although “new buildings may alter the views for individual residents within the campus or on neighboring properties, they would not substantially affect views of scenic vistas from public vantage points or for a substantial number of City residents.” The priority here seems to be people living in other areas of Saratoga and people looking in that direction from vantage points miles away. As one of those “individual residents,” I find this an insulting judgement, which ignores the senior residents and is a blatant discrimination of elders.

The DEIR also mentions that removal of trees and the subsequent noise generated by their removal would have a significant impact on the habitats and lifecycles of local bats. While I agree that this is an important consideration (and argument against tree removal), the DEIR makes no mention of the impact of these losses on the elderly residents who are not able to easily relocate their residences to a nearby open area and must endure the noise and disruption in their homes.

20.4 3. Loss of Green Space and Outdoor Recreation Facilities

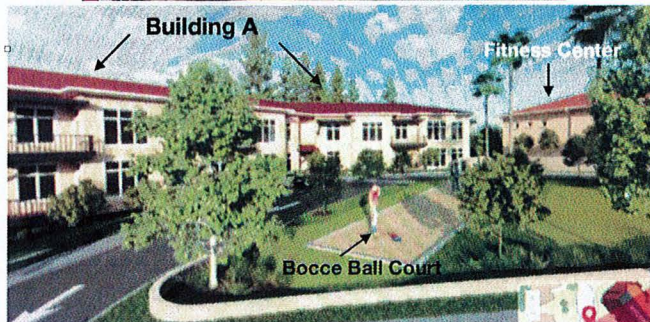
The proposed Building A and meeting room addition to the Manor building would remove *all* of the current green space and outdoor recreation facilities at SRC. The DEIR says that this will have “no impact on open space and recreation facilities for City residents.” This statement seems to relegate SRC residents and many of our neighbors to nonresident status and completely dismisses the impact of the loss of outdoor facilities on these people. SRC residents and our neighbors shop and pay taxes in Saratoga—and we vote.



20.4  
Cont.

**Current View: Odd Fellows Park from West Cottages Lane**

- Redwood and oak trees will be eliminated
- All green space replaced with massive Building A
- All recreational sites are eliminated by Building A



**Same view if PRS plan is approved**

- Building A occupies entire open space of Odd Fellows Park
- View from street becomes of balconies and buildings, instead of trees and green open space
- Bocce Ball Court reduced from 91 feet to 60 feet, and shade eliminated



This green space, the Odd Fellows Historical Park, currently sports paved pathways with many benches and tables. A large number of SRC residents (average age 85) have mobility issues requiring canes, walkers, wheelchairs, or motorized assistance to get around. For them and others with physical disabilities, this park is the only accessible outdoor recreation available. The DEIR states that there are other paths and trails within a short driving

distance, and even one trail accessible from SRC by a 300-ft path up a steep incline, but these are in no way accessible to residents whose disabilities prevent them from driving or using unpaved trails. The DEIR seems to overgeneralize the population they are assessing and therefore fails to accurately determine the impact on them.

In addition to SRC residents, many neighbors visit the Historical Park regularly to walk their dogs or bicycle in the safe, quiet area. Removing the park means that everyone in the area would have to travel elsewhere to find a similar quiet green space.

**4. "Replacement" Bocce Ball Court Not a Usable Replacement**



The current 91-foot, regulation size bocce ball court and other outdoor recreation facilities such as a putting green would be removed if Building A is constructed. The DEIR states that *smaller* replacements would be built in a tiny area west of Building A, and these smaller facilities would be enough for SRC residents and not impact most Saratoga residents. The "replacements" are not fine with us. At present, more than 60 residents regularly play bocce ball here. Bocce ball is also a popular spectator sport for many more residents,

20.4  
Cont. especially those with limited mobility, for whom it is easily accessible by the paved paths through the Historic Park.

The “replacement” bocce ball court would be only 60 feet in length, 2/3 of regulation size. Some of the SRC teams compete with outside teams on regulation 91-foot courts. Losing our 91-foot court means that those residents would have to find another court, who knows where, to practice for competition. The proposed 60-foot “replacement” is unacceptable and indicates another example of the devaluation of the impact of this project on residents.

20.5 In summary, there are many reasons why constructing Building A and the meeting room addition to the Manor building would have a negative effect on the historic, environmental, and human aspects of the Saratoga Retirement Community and its neighbors. Here I have listed only a few of the most important reasons for me. There are other options for development that can meet all goals without either of those buildings. We accept a project with limited buildings or the Residents’ alternative which gives minimal impact on the residents’ environment.

At the very least, please insure that the entire impact of constructing those buildings is evaluated in the environmental impact study. As it is now, the DEIR seems to have overlooked or undervalued many impacts on those of us most affected.

Sincerely,



Cynthia Richardson, Project Planner  
13777 Fruitvale Avenue  
Saratoga, CA 95070

21.1

Just look at these photos. Can you see why we treasure our campus? If you allow PRS to build these monstrous apartment buildings, we will lose our outdoors recreation, our green open space, our views, our protected mature trees and the fresh air.

We strongly against building these apartment building right in the center of our campus.

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**Current View: Odd Fellows Park from West Cottages Lane**

- Redwood and oak trees will be eliminated
- All green space replaced with massive Building A
- All recreational sites are eliminated by Building A



**Same view if PRS plan is approved**

- Building A occupies entire open space of Odd Fellows Park
- View from street becomes of balconies and buildings, instead of trees and green open space
- Bocce Ball Court reduced from 91 feet to 60 feet, and shade eliminated



Dear EIR consultant, Planning Commissioners and City Council,

22.1 I am a resident at the Saratoga Retirement Community. I am concerned about the SRC expansion proposed by the out-of-state management company.

I understand the EIR consultants have concluded that the apartment building in front of the Manor and the building on the employee parking lot site to the west of the Manor along the Odd Fellows Lane have significant impact on the historical resources. Because they would obscure the historical Manor. But the Meeting Room tacked onto the west wall of the Manor building is acceptable.

22.2 We do not agree with the DEIR statement that the mitigation is less than significant as stated in Impact CUL-1: Adverse Change to Historical Resources

**Current View of West Wing of Manor from Entry Parking Lot**

Existing green open space and trees will be eliminated



When you drive into the Odd Fellows Lane, immediately you see the beautiful open space with trees and the west wall of the Manor building. It is quite an impressive view. If you put the two level structure such as the proposed Meeting room attached to the Manor, it would be in the direct sightline of the Manor, it would reduce the magnificent view of the Manor.

22.3



Same View if PRS plan is approved

In addition, the Meeting room would completely offset the original symmetrical design of the Manor. Manor is a historical building over 100 years old and is one of the two significant buildings in Saratoga. It is on the Saratoga historical inventory list. It should not be altered.

The red zone on the left (West) to the Manor indicates the Meeting Room site. The proposed 2-level Meeting Room completely destroys the original symmetry of the historical Manor. And it occupies the green open space and eliminates the existing beautiful mature trees.





22.4

In addition to the above aesthetic and cultural issues of the Meeting Room, here are some serious



issues of the proposed Meeting Room:

1) The proposed building site of the Meeting Room Addition requires the elimination of 14 mature trees, including Chinese pistache, liquidambar, crepe myrtle, and protected redwoods.

Shown here the white Manor West view is to the left. The Meeting room is going to occupy where the trees and the lawn area. All the trees, including the protected mature redwood trees are to be removed.

The Project will replace these majestic

mature trees with some young small trees or bushes. This is NOT acceptable.

22.5

2) Daytime noise during construction of the proposed Meeting Room Addition is estimated to reach 95 decibels, which exceeds the FTA [Federal Transit Administration] recommendations. The sound of the fire alarms in residence hallways is equivalent to 95 decibels. Retired seniors do not work outside of their apartments, they use their apartment during daytime, the constant many months of loud noise is harmful to their mental health. Where is study of the human impact? What can the seniors do when the noise level is insufferable and last so long? Please be humane, we did not move to a loud and disturbing construction zone. The impact is significant. We disagree with the less than significant impact in (MN-NOI-1a)

3) Vibration from heavy construction equipment and soil compaction from the weight of the new Meeting Room Addition on recently excavated ground, shown in Table 3.12-10 could cause irreparable damage to the foundation of the historic Manor. The impacts on Humans living or working in the Manor are not evaluated. How can you enforce the suggested minimization measures which are both impractical and inefficient. How does notification of vibration level help the residents? They cannot move out during this period when the project uses vibratory rollers, or drill rigs or large bulldozers etc. The impact is significant. We disagree with NM-NOI-2

22.6

4) The construction length is unrealistic. Table 4.5-6 listed that 3 months of 95 dBA noise and 7 month total. How do you guarantee for this projected length? Do the residents have any leverage if the construction length is violated? The Construction period is unrealistic. Construction duration has never been proven to be within schedule at SRC. The said 3 months grading/foundation, 7 months total seems to be unreal. Judging by the last major repair work on campus, it took 9 months to repair the balconies for the apartment buildings. During the 9 months, residents had no natural light and no fresh air. In spite of the complaints, Management never paid any attention. So we definitely do not trust in this unrealistic timeline.

All these issues have significant impacts to the residents and the environment.

**PLEASE DO NOT ALLOW THE MEETING ROOM!**

## Suggested input on DEIR

23.1

The Project Description in the Executive Summary includes the following statement:

“the number of skilled nursing beds within the Health Center would be reduced from 94 to 52 (ie., 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 each with their own fully-accessible bathroom.”

The Project Objectives #4 states:

“Provide upgrades to the existing Health Center, which would include converting existing semiprivate rooms to private rooms with private baths.”

**That seems to be where references to the Renovation of the Health Center stops.**

There are no references to the construction work that will proceed in stages in the Health Center, nor are there any references to the impact on the 50 to 60 vulnerable senior patients housed in the Health Center during this 2 year construction:

**Reference MFS-3 (Direct or indirect Adverse Effects on Human Beings).**

Additionally, there are no references to the noise, vibrations, dirt and dust or displacing these senior patients to make way for construction while raising significant hazards to their health. Reference HAZ-1, HAZ-5, LUP-1, NOI-1, NOI-2, POP-2, UTI-1, UTI-3, WF-3 and MFS-3.

The only Alternative which avoids this problem is the Residents' Alternative 1. The DEIR needs substantial revisions to recognize this issue.

24.1

The DEIR has reviewed the Project plans for a building B in front of the Historical Manor Building and the proposed Meeting room attached to the side of the same Manor Building with astonishing different standards.

In the case of Building B the EIR found a conflict with the Historical Manor that could not be mitigated **(See Table 3.5-1- Item 9 and 10 of the Summary of Project Adherence to Secretary of Interior's Standard for Rehabilitation )**

**In that same table, 3.5-1 The finding for item #9 found a potential conflict with the meeting room.**

The next page ,3-94 , item 2 states

“The proposed construction of the Meeting Room and its attachment to the West elevation the Manor building thru a building hyphen would also remove and/or alter character defining features represented in the west (secondary) elevation.”

On page 3-101 the EIR further states

“The proposed construction of the Meeting Room Addition as part of the Project could potentially result in the substantial adverse change in the Manor Building due to the potential for damage during construction”

The symmetry of the Manor Building is forever lost with the Meeting Room attached to its western wall of the Manor.

**The Meeting Room needs a specific evaluation under CUL-1.**

24.2

Additionally, there has been no evaluation of the environmental impact of the Residents living in Apartments 1101,1202 and 1203 during construction or after wards with their apartment windows on the western manor wall being mostly blocked out by the new Meeting Room.

24.3

**At a minimum EIR evaluations and mitigations should be reviewed for AES-1 Scenic Vista, HAZ-i hazardous emissions, NOI-1increased noise levels, NOI-2 vibrations & dust, POP-2 displacement of people, and MFS-3 adverse impact on human beings.**

**EIR N.**

EIR FORM TO PROVIDE INPUTS TO THE PLANNING DEPT OF SARATOGA CITY, CA.  
email to: Cynthia Richardson <crichardson@saratoga.ca.us>

**THESE ARE MY COMMENTS ABOUT THE PRELIMINARY EIR OF THE SARATOGA RETIREMENT COMMUNITY EXPANSION PROPOSAL.**

1. Version of EIR: SCH#2021110366 July 2023
2. Alternate Plan Numbers: Circle Alt 2 & 3
3. Name of Submitter:
4. Residence of Submitter: Street: \_\_\_14500 Fruitvale Ave, \_\_\_ Apt \_\_\_  
City: Saratoga State: CA. - 95070 Date: 7/22/2023
5. Date of Submission: July 2023 Do you approve of the EIR: **NO**
6. Topic: Name of the topic of your comments:  
Objections to the EIR as presented on multiple issues, including Alt 1,2,3
7. EIR Page numbers: From \_\_\_Pg\_2-34 Par 2.4.4\_\_\_TO: \_\_\_Pg\_\_\_IV\_\_\_EIR
8. Describe your concern with the DEIR:

THIS IS A VERY SCARY PLAN WHICH WILL OVERWHELM THE THEN RESIDING RESIDENTS, ENDANGERING THEIR LIVES AND LIMBS.

25.1

**F. TRAFIC CONTROL : 2.4.4 Pg. 2-34 Par 3**

Emergency access routes within the campus would be maintained throughout construction. **Colfax Lane and West Cottages Lane** would be **temporarily rerouted** for approximately 3 months (!!!) during Phases 2 and 3; however, at least two of the three access roads would be open for emergency vehicle access at all times.

This rerouting of just 3 months is illusory, and does not address how residents of the cottages will be able to enter their garages, etc.

**This is a real double talk. In one section it is said that analysis and resolution of the traffic within the SRC campus during construction is an SRC issue, and that the EIR does not address such.** It just Promises that emergency routes will be open – but what about normal inhabitants??

**In another section it is stated that the Park would be used for staging During the whole XX years of construction.**

This is really a grand!

Effort to destroy, endanger and encumber the lives of residents for who knows how many years.

The last stated duration was announced on July 20, 2023 by the PRS hired Consultant and Project Leader, that it would take 7 (seven) years to complete the construction of plan 3, so for all these years we would be looking at dirt, trucks, etc.



Cynthia Richardson  
13777 Fruitvale Ave.  
Saratoga, CA 95070

Dear Ms. Richardson,

26.1

Saratoga has been named Tree City USA every year since 2006 and has won several national awards for its trees like America in Bloom's Best Tree Canopy, Best Urban Forest and Best Tree Heritage Program from 2015-2017.

However, after recent winter storms, Saratoga's tree canopy faced several threats from extreme rainfall and strong winds. At least 13 large trees and 15 limbs had to be removed from Saratoga roads. Others fell on private property.

At a time when trees are being lost due to weather, it is sad to think that the City would allow perfectly healthy trees to be chopped down for the sake of building housing. Such is the plan before the City Council and Planning Commission when a developer is proposing several buildings be built at Saratoga Retirement Community (SRC) that would take down 124 trees, 65 of which are protected by the City's code. Some of these large trees are over 100 feet tall and six feet in diameter. They provide shade, habitat for birds and other animals and contribute to the beauty of the SRC campus. They buffer noise, cool the environment at a time of record breaking heat and help to remove carbon dioxide from the atmosphere.

SRC does not need the proposed buildings at the sake of losing one of the things that makes it so special to the residents....tall, majestic, healthy trees. I urge the City Council and the Planning Commission to reject this plan in favor of "no plan" or at the very least the resident's alternative plan.

Cynthia Richardson, Project Planner,  
13777 Fruitvale Avenue, Saratoga, CA 95070

Dear Planning commissioner and the City Council,

27.1 We here at SRC have moved here to spend our remaining years in the lovely verdant town that is Saratoga. Our senior community is a vibrant part of this town. Many of us have lived for years in our Saratoga homes before moving to the Retirement Community.

You can imagine our dismay & distress when we learned that PRS has plans to destroy our greenery to make way for more buildings & apartments. The residents have presented a plan that would not have nearly the ugly environment impact as the PRS plan.

We hope the City of Saratoga will seriously consider this alternate plan—one that would establish both the new residences and the needed improvements of other buildings, but would not have the disastrous impact on our campus.

To EIR consultants, Planning Commissioners and City Council,

28.1 When I read the DEIR, I found the report ignoring the environment and the lives of our 200 Independent Living residents on campus. There are issues which cannot be mitigated to less than significant as suggested in the DEIR.

Here are a few examples on Recreation and Open Space:

1) The full size 91-foot long Bocce ball court cannot be replaced by the shorter 2/3 length court. DEIR 3-260 stated, "These facilities would be reconstructed elsewhere on campus, although some of the reconstructed facilities may be of a smaller size than the existing facilities."

Please note The facility has to be full size. The reconstructed elsewhere is vague and Needs more specifics.

We have over 60 regular players with many different competitive teams on campus. This is the most popular outdoor activity for the SRC senior population, even residents with walkers strive to play. We do not agree with the conclusion in Impact REC-2. The impact is Significant. This facility would be demolished to create space for proposed Building A. We object building A.

2) The new building A and meeting room would remove ALL the remaining outdoor recreation green space. The space is currently not on any previously disturbed areas. The residents depend on this space to have fresh air, to have outdoor recreation, to relax and to enjoy the natural vista. The wide range indoor recreation activities cannot replace the outdoor recreation activities. We disagree with the Impact REC-2 analysis.

The Impact analysis for REC-1 concludes "the Project is not anticipated to cause a substantial increase demand for public open space and recreational facilities within the city." But there is no analysis of the impact on the residents and the neighbors. There are over 200 Independent Living residents who use this space daily, the daily demand is large. The environmental impact is significant when you eliminate this space.



To EIR consultants, Planning commission and City council,

29.1

I am a resident at the Saratoga Retirement Community.

When I read the DEIR, I found the report ignoring the environment and the lives of our residents on campus. There are issues which cannot be mitigated to less than significant as suggested in the DEIR.

Here are a few examples on Recreation and Open Space:

1) We lose our Odd Fellows historical park if Building A is allowed. The EIR section 3.15.1 listed 28 acres of existing public park facilities within one mile of project site.. SRC expansion will have no impact on a single existing public recreate facility.”

Let me ask, “Where is the study for the impact on the SRC residents? Even though there are 28 acres nearby, would you ask your elderly parents to take Uber to one of these parks with their walkers? At present, the park on campus is accessible any time and day, residents take their walkers to the park, sit on the chair and enjoy fresh air. Neighbors come with their dogs, walk or bike around the campus. This park serves many citizens. To eliminate this park has a very significant environmental impact. But The DERI REC-1 never studies the impact on the residents if you eliminate the park.

2) Loss of the open space on SRC

Building A and Meeting room take away the remaining 6% of our accessible open green space. EIR 3.15.1 environmental setting listed that the new trail connects the Project to the San Marcos Open Space approx. 300 feet SE of the Project site. Please note the 300 feet is “as the crow flies “distance. One has to climb up a steep embankment—inaccessible except by a 2.5-mile round trip along the road or by helicopter! While on campus, we currently have safe and smooth paths for the seniors to enjoy the open space. Many senior here have mobility issues, poor eye sight, hard at hearing and limited physical strength, they are not able to go on any of the suggested open space or hiking trails. DEIR ignores the special needs of the Seniors on campus. The analyses are inappropriate, irrelevant and discriminating against the senior population.

30.1

**WHY DID YOU COME TO SARATOGA TO LIVE AND RETIRE?**

**WHAT WAS IT ABOUT THE ENVIRONMENT THAT WAS SO APPEALING THAT YOU SPENT 25 OR 50 OR MORE YEARS OF YOUR LIFE HERE?**

**WHAT DO YOU MEAN WHEN YOU USE THE WORD ENVIRONMENT?**

We now have a 650 page DEIR document that is supposed to define the Saratoga environment and how it will be affected by the expansion.

Is that how you would define our environment here in Saratoga? Or would you use words like beautiful, relaxing, stimulating, peaceful, rural, close to nature with natural historic trees, a central park for relaxation and activities in foothills of the Santa Cruz mountains?

Would you include the beautiful views and vistas from your apartment or cottage?

Would you include playing bocce ball under the redwoods within easy walking with your walker from your home?

Would you include facilities that are non-institutional and low population density?

Would you include large lots, open spaces and privacy?

Would you include the beauty of being in the foothills of the Santa Cruz Mountains?

The DEIR is a bureaucratic writeup that misses the key environmental factors that are the basis for our wanting to live here in Saratoga. The authors never asked Saratoga residents what in the Saratoga environment they value the most. This is a fatal flaw in their methodology and renders the document useless and totally misleading.

According to that report, vistas are only for outsiders and not for SRC residents who love looking out of their windows through the redwoods to the eastern foothills or the Santa Cruz Mountains. Outdoor recreational areas are for outsiders, not for SRC residents who cannot drive or walk without aid and cannot travel to outside recreational areas. The Odd Fellows Historical Park can be eliminated even though it is SRC's only outside recreational area analogous to Central Park in New York city. Even prisons have outdoor recreation areas. Bats are more important than residents.

This island of apartments that would be packed so close together that there is no room for even a bocce ball court may belong in Cupertino or Sunnyvale or San Jose which are replete with high density apartment house complexes, but it does not belong in Saratoga.

I urge you to use your brains and hearts and realize this expansion project will do irreparable and un-mitigatable damage to Saratoga and the Saratoga Retirement Community's environment.

To the EIR consultants, the Planning Commissioners and City Council,

31.1

Saratoga Retirement Community is widely know for it's beautiful green campus - full of trees, bushes, walking paths, & lovely landscaping.

The new PRS Expansion Plan plans to eliminate most of this beauty by packing it with more housing & more buildings. There are 124 beautiful large trees (& much more greenery) scheduled for destruction.

Our park & outdoor recreation area will be taken from us. Our trees & our birds will be gone. It will be incredibly sad & depressing for those of us in the last years of our lives.