



**SRC RESIDENTS’ COMMENTS on
Draft Environmental Impact Report and Project
August 21, 2023**

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Section 1 – SRC Residents’ Recommendation

(Based on the residents’ comments included in this report)

Although our primary recommendation is “No Project” to the proposed expansion, we realize this isn’t a possible option because of the pressure on Saratoga to approve such proposals to meet the state’s housing requirement and the justification of “No Project” has to be based on Health and Safety. However, we support the need to add housing units to our SRC campus and we thereby agree with either of the below alternatives:

- A modified Alternative 2 (Alternative 2 was recommended by the DEIR) – Building A and Meeting Room should both be eliminated from the alternative because of environmental concerns that are expressed in the resident’s feedback to the DEIR. Although Building C is still part of the alternative, it should be limited in height so it doesn’t interfere with the view either of or from the historical manor. And with conditions that Emergency evacuation route be built and have scheduled renovation for the Health Care Center.
- Alternative 1 (Alternative 1 is the recommended solution by the SRC residents) – This solution provides for a new Health Care Center to be built at the same location as the building C in alternative 2. It also provides for a 52-unit building (not the 35 stated in the DEIR) where the current Health Care Center is located. Alternative 1 is incorrectly described in the DEIR; please refer to the resident’s DEIR input correcting this description or details of the Residents’ alternative as documented on the PreserveSRCCampus.org website.

Section 2 – Residents’ Response Summary Details

This section includes details of various aspects of the SRC resident’s response, including omissions and errors in DEIR.

- 1. Mischaracterization of resident population**
- 2. Misrepresentation of the Residents’ Alternative Plan (Alternative 1)**
- 3. Remove Financial Objective from Environmental Impact Report**
- 4. Meeting Room Addition to Manor Building Needs More Study**
- 5. Impact of Construction Noise on Residents**
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- 7. Traffic and Emergency Evacuation**
- 8. Impact of Health Center Renovations Omitted from DEIR**
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Omissions and errors in DEIR,

1. Mischaracterization of resident population

The consultants fail to understand that the population of the Saratoga Retirement Community (SRC) is elderly, with an average age of 85. Many have physical disabilities affecting mobility, sight, and hearing, and others have cognitive disabilities affecting decision making, reaction times, and ability to adapt to change. Most are retired and spend a significant amount of their time in their homes or at other sites within the confines of the community. Some require assistance in daily living tasks and cannot leave the community easily. Around 50-60 residents are bedridden patients at the Health Center.

When the impact on human beings is taken into account in the DEIR, the people mentioned are the general population of the City of Saratoga, or even unidentified visitors to vista points miles away from SRC. In one case, priority is given to bats over people! When the impact on actual SRC residents is even mentioned, it is usually dismissed as negligible or not enough to warrant consideration. Substandard mitigation is considered good enough for the residents in the form of smaller or fewer recreation facilities or enough notice that noise or vibration beyond endurance is about to occur so they'd better be prepared.

Consultants need to investigate the true impact on the real-life human population of SRC, and mitigation must actually meet the needs of this population and no other. Anything less is an outrage.

2. Misrepresentation of the Residents' Alternative Plan (Alternative 1)

In DEIR Section 4.1 Alternative 1, the EIR consultants used the Ankrom Moisan architecture firm for the interior design of proposed Building D (Table 4.4-2). Although Ankrom Moisan was the designer for the Health Care Center in 1999, and they have the exact drawings of the footprints etc., yet their design used a completely different footprint from the one proposed in the Residents' Alternative Plan (the original footprint of the Health Center building, Table 4.4-1). This change was done without ever consulting or even notifying the residents, who would never have consented and very much object to the change. Instead, they chose to ask for clarification from the applicant, who is totally against the Residents' Alternative Plan.

Ankrom Moisan also misrepresented other features in Alternative 1, such as the size and shape of the proposed new Health Center, Building C (should be 40 beds rather than 52 beds), the number of parking spaces in the underground garage of Building D (only 50 spaces vs. 90 submitted under Alternative 1), and incorrect values in Table 4.4-2 for the excavate volume and maximum depth of excavation for the original design in Alternative 1 for Building D.

The final EIR must correct these major errors and unsanctioned changes to the Residents' Alternative Plan.

3. Remove Financial Objective from Environmental Impact Report

Although the objective to “generate an additional income stream” and “maintain a strong financial position” is a valid consideration for a development project, it is inappropriate to include it for assessment of environmental impact. The DEIR includes data regarding staffing costs and income generation for the various alternative plans but offers no indication of who came up with these numbers or how they were determined.

The statement that Residents’ Alternative 1 would not provide enough income and would require more staffing than other alternatives cannot be supported by the “data” included in the DEIR. In fact, SRC has a sustained performance over the last 10 years of positive operational performance, and there is no basis for a change in this performance while accumulating capital expenditures during the expansion.

Even if there was actual financial information available, it has nothing to do with the impact of any development on the natural, cultural, or human environment and should not be included in this study.

4. Meeting Room Addition to Manor Building Needs More Study

- On page 3-94, item 2, the DEIR states “The proposed construction of the Meeting Room Addition and its attachment to the west elevation of the Manor Building through 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 the western wall of the Manor Building. The Meeting Room needs a specific evaluation under CUL-1.
- On page 3-235, the DEIR states “Project construction could generate vibration levels that exceed the applicable thresholds for potential building damage at the Manor Building and that substantially exceed the threshold for human annoyance at several nearby residential receptors, the impact would be **potentially significant.**” And on page 3-237, “ ...it is anticipated that some use of heavy equipment within the buffers would be required to achieve the necessary soil compaction required to support the proposed building foundations (particularly for the Meeting Room Addition) and, therefore, that vibration levels at the Manor Building could still exceed the threshold for building damage at certain times. Knowing that there is a real possibility of damaging the historical Manor Building, why risk it?

Mitigation suggested is that the contractor try to limit the use of smaller heavy equipment and notify nearby residents within 14 days when vibrations will be heavier. What? This neither reduces the impact of vibration on the Manor

Building or provides relief to residents who would have to leave their homes for extended periods to avoid physical and mental damage. This is unacceptable.

- Residents living in apartments 1101,1202 and 1203 of the Manor Building will have the view from their apartment windows on the western manor wall almost entirely blocked by the new Meeting Room, during construction and forever afterward.

5. Impact of Construction Noise on Residents

The noise level is beyond the acceptable level, as noted in the DEIR report Table 4.5-6. Construction would generate noise levels of up to 95 decibels for the four west-facing units within the western wing of the Manor Building (apartments 1101,1202 and 1203). Noise at 95 decibels is like that of hallway fire alarms and exceeds the FTA recommended construction noise criteria of 80 decibels! Such loud noise for many hours during the day over many months can cause physical and mental health issues, especially for an already vulnerable elderly population.

Even noise at 80 decibels is excessive for the elderly population of SRC. This is the FTA standard for highway construction, not for construction in very close proximity to residences. Why is this standard used and not the standard for sensitive construction in hospital zones and near senior facilities?

This noise is expected to continue during the estimated 24 months of construction. Even if this estimate is accurate, and such estimates are historically not even close, the toll of that noise level for that length of time, particularly for construction of proposed Building A and the meeting room, is intolerable.

The mitigation suggested that the noise will occur only only during day time, so it will be quiet during after work hours. This report does not consider that senior residents are home most of the day and need naps. Why was no study done on the physical and mental health impact of noise on our specific population? Once again, the DEIR seems to dismiss the very real impact this project would have on very real people.

6. Loss of Green Space and Outdoor Recreation Facilities

- The Odd Fellows Historical Park is the only large green space on the SRC campus. 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. Mitigation suggested by 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. To suggest that residents travel to find

open, green space when there is no real reason to build over the Historical Park is not a reasonable alternative.

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.

- The current 90-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

At present, more than 60 residents regularly play bocce ball here. Bocce ball is also a popular spectator sport for many more residents, 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 90-foot courts. Losing our 90-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.

- The Historical Park contains over 100 trees, of which 65 are protected mature trees. All of them would be razed to allow for construction of proposed Building A and Meeting Room. Although many replacement trees will be planted elsewhere on campus, replacement trees cannot be compared with the current majestic, towering trees. The City Arborist determined that many trees are under stress after recent years of draught, but they are not near the point where they need to be removed.

The environmental impact of the trees on air quality is hardly evaluated in the DEIR, and the environmental impact of their aesthetic value is also lacking.

7. Traffic and Emergency Evacuation

- The estimated construction traffic and its analyses based on Table 4. 6-8 show the traffic impact to the neighborhood is substantial. No analysis was done on impact during the peak hours of school traffic or traffic during SRC staff shift changes.
- The receiving dock and loading zone areas remain unchanged and are already chaotic. Additional traffic from the nearby proposed Building A garage entrance, increased number of maintenance and delivery trucks, and Pavilion Circle traffic from the existing apartments would make this area constantly

congested. DEIR mitigation is to schedule delivery trucks to avoid double parking and blocking traffic, but it is impractical to expect that to work, and who would enforce the schedule anyway? The only answer is to block construction of Building A.

- Increased traffic during and after construction make it unsafe for SRC seniors to walk or drive at particular intersections and garage exits. Suggested DEIR mitigation is to install new stop signs, but no study included the particular requirements of seniors with slow reaction time, impaired mobility, or poor eye sight and hearing.
- Closing streets for many months at a time means residents along those streets cannot get in and out of their own driveways or even park near their homes. The DEIR must address a plan for this, understanding that the residents are seniors and may have disabilities or mobility issues.
- There is no solid plan for emergency evacuation involving the large number of ambulances needed to evacuate the 60 plus skilled nursing patients. The proposed evacuation entrance along Chester Ave. is only for large fire trucks; not for private vehicles. All 200 plus Independent Living residents and 200 or so employees are expected to evacuate in their own cars using the one-lane Odd Fellows Lane. A realistic, usable plan needed beyond the scheduling and notification of construction traffic. The DEIR must include a realistic review of emergency evacuations and ideas for implementing a usable plan.

8. Impact of Health Center Renovations Omitted from DEIR

Project objective 4 is to “Provide upgrades to the existing Health Center, which would include converting existing semiprivate rooms to private rooms with private baths.” All alternative plans include some sort of renovation for the current Health Center, but the DEIR includes no indication that any study of the impact of these upgrades was done.

There are no references to the demolition and construction work that would proceed in stages, nor any references to the impact on the 50 to 60 vulnerable senior patients housed in the Health Center during this 2-year construction period (MFS-3 Direct or indirect Adverse Effects on Human Beings).

Additionally, there are no references to the noise, vibrations, dirt and dust, or displacement of senior patients to make way for demolition and construction, while raising significant hazards to their health. What are the mental and physical health impacts during months of being shut in a room with limited air flow and natural light? (HAZ-1, HAZ-5, LUP-1, NOI-1, NOI-2, POP-2, UTI-1, UTI-3, WF-3 and MFS-3)

The only alternative that avoids this problem is the Residents’ Alternative 1. The DEIR needs substantial revisions to recognize this issue.

9. Air Pollution

The DEIR never addresses the cumulative air pollution effects on frail senior residents, who may have already asthma or breathing issues. Recently, during many months of balcony repair, many residents complained of breathing issues due to dust, diesel fumes, etc. All the administration did was to ask residents to purchase their own air purifiers. This project would be much longer and generate much more air pollution, and the EIR needs to address this particular population.

10. Incorrect Assessment of Public Benefits

- Alternative 2 offers no planned parking for the public when using the Meeting Room. Even at present, parking is difficult for the residents and visitors. The DEIR (2.3.3) states that parking will be available in the lower-level garage at Building B, but Building B and its underground garages are deleted in Alternative 2. Where are the additional parking spaces for the public use of the Meeting Room?
- The DEIR states (REC-2) that “a public trail connection along Odd Fellows Drive, connecting Fruitvale Avenue with the San Marcos Open Space, via Chester Avenue, Gypsy Hill Road, and Via De Marcos” must be created. This public trail is already documented and was approved by the City’s Pedestrian, Equestrian & Bicycle Trails (PEBTAC) Advisory committee in October 2020. The PRS proposal does not need to create this trail connection unless it is destroyed during construction. The above quotation shows that the EIR consultants did not look up the existing document and thereby drew false conclusions. The trails are already in existence without the proposal. It does not have any additional public benefit due to the Project. Please correct this statement.

Section 3 – Residents’ Direct Responses to the DEIR

The attached box includes over 300 individually signed SRC resident letter/email DEIR and Project responses. Although all of the responses are pertinent several of the more insightful ones are gathered and clipped together at the top of the stack.

Also, an estimate of over 100 letter/email responses by SRC residents were sent directly to Cynthia Richardson, City Project Planner.

The SRC residents have submitted a total of over 400 individually signed responses identifying problems with the flawed DEIR and with the Project itself.

Respectively submitted by

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On behalf of the 184 Preserve SRC Campus Interest Group members