

ROEDING REGIONAL PARK AND FRESNO CHAFFEE ZOO  
FACILITY MASTER PLANS  
**FINAL ENVIRONMENTAL IMPACT REPORT**  
**RESPONSE TO COMMENTS**  
SCH No.: 2008031002

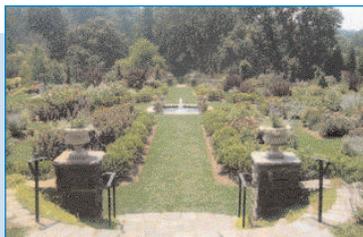
*Fresno Chaffee Zoo*



*Roeding Park*



January 21, 2011





2600 Fresno Street, Third Floor, Room 3065  
Fresno, California 93721-3604  
(559) 621-8003, FAX (559) 498-1012

**John M. Dugan, AICP**  
**Director**

**DATE:** January 21, 2011

**TO:** Commenting Agencies and Individuals

**FROM:** Kevin Fabino, Planning Manager  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, California 93721-3604

**SUBJECT:** Response to Comments on the Draft EIR for Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans

In compliance with the California Environmental Quality Act (CEQA) Section 21092.5(a), the City of Fresno is providing a written response to each individual comment submitted on the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans Draft EIR.

The City of Fresno Planning Commission will hold a public hearing on Roeding Park Facility Master Plan and Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans Final EIR on January 26, 2011 at 6:00 p.m. at Fresno City Hall – Council Chamber, Second Floor, 2600 Fresno Street, Fresno, California 93721. Any decisions by the Planning Commission regarding this matter will be considered as a recommendation to Council, which the Council may accept, reject or modify. The specific date of the Fresno City Council public hearing for deliberation on the Roeding Park Regional Park and the certification of the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans Final EIR has not been determined at this time. At a later public hearing conducted after the City Council considers certification of the Final EIR and approval of the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans, the City of Fresno Planning Commission will consider Condition Use Permit Application C-08-186 which would entitle the development of Roeding Regional Park, including the expansion of the Fresno Chaffee Zoo, as described in the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans.

If you have any questions or wish additional information, contact Kevin Fabino, Planning Manager, at the Planning and Development Department, Planning Division, Fresno City Hall, 2600 Fresno Street, Fresno, California 93721-3604, by telephone at (559) 621-8046, or by e-mail at [Kevin.Fabino@fresno.gov](mailto:Kevin.Fabino@fresno.gov).



**Final Environmental Impact Report  
Response to Comments  
Roeding Regional Park and Fresno Chaffee Zoo  
Facility Master Plans  
Fresno, California**

**State Clearinghouse No. 2008031002**

Prepared for:  
**City of Fresno**  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, CA 93721-3604  
559.621.8046

Contact: Contact: Kevin Fabino, Planning Manager

Prepared by:  
**Michael Brandman Associates**  
220 Commerce, Suite 200  
Irvine, CA 92602  
714.508.4100

Contact: Michael Houlihan, AICP, Manager of Environmental Services



January 21, 2011



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## SECTION 1: INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the County of Fresno, as the lead agency, has evaluated the comments received on the Draft EIR for the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans.

This document is organized into these sections:

- **Section 1** - Introduction.
- **Section 2** - List of Commentors.
- **Section 3** - Responses to Written Comments on the Draft EIR: Addresses each written comment submitted to the City of Fresno.
- **Section 4** - Errata: Includes an addendum listing refinements and clarifications on the Draft EIR, which have been incorporated.

Because of its length, the text of the Draft EIR is not included with these written responses; however, it is included by reference in this Final EIR. None of the corrections or clarifications to the Draft EIR identified in this document constitutes “significant new information” pursuant to CEQA Guidelines Section 15088.5. As a result, a recirculation of the Draft EIR is not required.

The Final EIR includes the following documents:

- Draft EIR (provided under separate cover)
- Responses to Comments (contained in this Final EIR)
- Errata (contained in this Final EIR)
- Mitigation Monitoring and Reporting Program (provided under separate cover)



## SECTION 2: LIST OF COMMENTORS

A list of public agencies, organizations, and individuals who provided comments on the Draft EIR is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. The text of the communication is reprinted in Section 3, Responses to Comments, immediately followed by the corresponding response.

Correspondence Code	Commentor	Date
<b>A</b>	Office of Planning and Research, State Clearinghouse, Scott Morgan	November 29, 2010
<b>B</b>	Native American Heritage Commission, Dave Singleton	October 28, 2010
<b>C</b>	California Department of Fish and Game, Lisa Gymer	November 23, 2010
<b>D</b>	California Public Utilities Commission, Moses Stites	November 23, 2010 and October 15, 2010
<b>E</b>	Department of Transportation, Christine Cox-Kovacevich	November 23, 2010
<b>F</b>	California Office of Historic Preservation, Department of Parks and Recreation, Milford Wayne Donaldson	November 23, 2010
<b>G</b>	County of Fresno, Planning and Public Works Department, Theresa Acosta-Mena	November 29, 2010
<b>H</b>	County of Fresno, Public Health Department, Glenn Allen	October 19, 2010
<b>I</b>	Fresno Metropolitan Flood Control District, Rick Lyons	November 22, 2010
<b>J</b>	Jessica R. Willis, San Joaquin Air Pollution Control District	November 23, 2010
<b>K</b>	Madera Unified School District, John R. Stafford	November 22, 2010
<b>L</b>	Historic American Landscape Survey, Janet Gracyk	November 9, 2010
<b>M</b>	East Fresno Rotary, Rick Leas	November 17, 2010
<b>N</b>	Central Unified School District, Michael A. Berg	November 17, 2010
<b>O</b>	Fresno Historic Preservation Commission, Don Simmons, Ph.D.	November 22, 2010
<b>P</b>	National Trust for Historic Preservation, Western Office, Elaine Stiles	November 23, 2010
<b>Q</b>	California Preservation Foundation, Jennifer M. Gates	November 24, 2010
<b>R</b>	George C. Roeding, III	October 25, 2010

**List of Commentors**

<b>Correspondence Code</b>	<b>Commentor</b>	<b>Date</b>
<b>S</b>	Jennifer de Graff	October 28, 2010
<b>T</b>	Barrie D. Coate and Associates, Barrie D. Coate	November 2, 2010
<b>U</b>	David Driaspa	November 3, 2010
<b>V</b>	PGAdesign Landscape Architects, Chris Pattillo	October 22, 2010, November 10, 2010, November 12, 2010, and November 23, 2010
<b>W</b>	Katherine Howard	November 14, 2010
<b>X</b>	Richard L. Harriman, Law Offices of Richard L. Harriman	November 24, 2010
<b>Y</b>	County of Fresno Department of Public Works and Planning, Bernard Jimenez,	December 3, 2010
<b>Z</b>	Fresno County Office of Education, Larry L. Powell, Superintendent	November 22, 2010
<b>AA</b>	Office of the Mayor, City of Orange Cove, Mayor Victor P. Lopez	November 30, 2010
<b>BB</b>	Garces Memorial High School, John L. Fanucchi	November 30, 2010

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## **SECTION 3: RESPONSES TO COMMENTS**

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### **3.1 - Responses to Comments**

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#### **Introduction**

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Fresno, as the lead agency, evaluated the comments received on the Draft EIR (State Clearinghouse No. 2008031002) for the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans, and has prepared the following responses to the comments received. This Response to Comments becomes part of the Final EIR for the project in accordance with CEQA Guidelines Section 15132.

#### **Comment Correspondence and Responses**

The comment correspondence reproduced in the following pages follow the same order in Section 2, List of Commentors.



Arnold Schwarzenegger  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Cathleen Cox  
Acting Director

November 29, 2010

Kevin Fabino  
City of Fresno  
2600 Fresno Street  
Fresno, CA 93728

Subject: Roding Regional Park and Fresno Chaffee Zoo Facilities Master Plans  
SCH#: 2008031002

Dear Kevin Fabino:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on November 24, 2010, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

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These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2008031002  
**Project Title** Roeding Regional Park and Fresno Chaffee Zoo Facilities Master Plans  
**Lead Agency** Fresno, City of

**Type** EIR Draft EIR  
**Description** The Fresno Chaffee Zoo is in the south-central portion of Roeding Regional Park, Rotary Playland is in the southwest corner, and Rotary Storyland is along the west boundary. The proposed zoo expansion area encompasses 21 acres generally east of the existing zoo, and the proposed Rotary Storyland and Playland expansion area encompasses approximately 2 acres adjacent to the existing boundaries of Rotary Storyland and Playland grounds.

**Lead Agency Contact**

**Name** Kevin Fabino  
**Agency** City of Fresno  
**Phone** 559-621-8046 **Fax**  
**email**  
**Address** 2600 Fresno Street  
**City** Fresno **State** CA **Zip** 93728

**Project Location**

**County** Fresno  
**City** Fresno  
**Region**  
**Lat / Long** 36° 45' 1" N / 119° 49' 11" W  
**Cross Streets** State Route 99 and Belmont Ave  
**Parcel No.** 458-114-02  
**Township** 13S **Range** 20E **Section** 32 **Base** MDB&M

**Proximity to:**

**Highways** Hwy 99  
**Airports** Fresno Chandler  
**Railways** UPRR  
**Waterways**  
**Schools** Multiple  
**Land Use** Regional Park and Zoo/Open Space Conservation District/Regional Park

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Noise; Public Services; Recreation/Parks; Toxic/Hazardous; Traffic/Circulation; Vegetation; Landuse; Cumulative Effects; Aesthetic/Visual; Drainage/Absorption; Flood Plain/Flooding; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Water Quality; Water Supply; Wildlife; Growth Inducing

**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 4; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 6; Regional Water Quality Control Bd., Region 5 (Fresno); Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

**Date Received** 10/11/2010 **Start of Review** 10/11/2010 **End of Review** 11/24/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

***Office of Planning and Research, State Clearinghouse, Scott Morgan - November 29, 2010 (A)  
Response to Comment A-1***

This comment acknowledges that the Draft EIR was distributed to selected state agencies for review. The state agencies sent the Draft EIR were Resources Agency, Department of Fish and Game - Region 4, Office of Historic Preservation, Department of Park and Recreation, Department of Water Resources, Caltrans - Division of Aeronautics, California Highway Patrol, Caltrans - District 6, Regional Water Quality Control Board - Region 5 (Fresno), Department of Toxic Substances Control, Native American Heritage Commission, and Public Utilities Commission. No specific comments on the Draft EIR were provided by the State Clearinghouse; therefore, no further response is necessary.

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
e-mail: [ds\\_nahc@pacbell.net](mailto:ds_nahc@pacbell.net)



October 28, 2010

Mr. Kevin Fabino, Planning Manager

**City of Fresno**

2600 Fresno Street  
Fresno, CA 93728

Re: SCH#2008031002 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans Project; located in the southwestern portion of the City of Fresno east of S.R. 99; Fresno County, California

Dear Mr. Fabino:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3<sup>rd</sup> 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amendment effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance. The lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. State law also addresses Native American Religious Expression in Public Resources Code §5097.9.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural Resources were not identified within one-half mile of the Area of Potential Effect (APE). It is important to do early consultation with Native American tribes in your area as the best way to avoid unanticipated discoveries once a project is underway and to learn of any sensitive cultural areas. Enclosed are the names of the culturally affiliated tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.

Furthermore the NAHC recommends that you contact the California Historic Resources Information System (CHRIS) of the Office of Historic Preservation (OHP), for

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information on recorded archaeological data. This information is available at the OHP Office in Sacramento (916) 445-7000.

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f] *et seq.*), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq.*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e).

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of 'historic properties of religious and cultural significance' may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors'. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

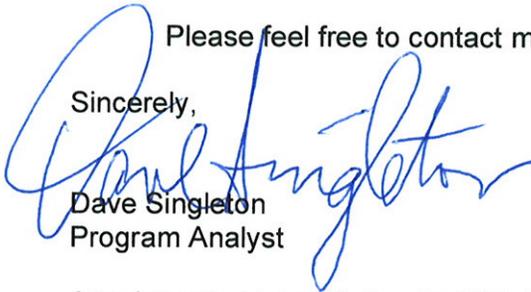
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CONT

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

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CONT

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Dave Singleton". The signature is written in a cursive, flowing style.

Dave Singleton  
Program Analyst

Attachment: List of Culturally Affiliated Native American Contacts

Cc: State Clearinghouse

Big Sandy Rancheria of Mono Indians  
Liz Hutchins Kipp, Chairperson  
P.O. Box 337 / 37302 Western Mono  
Auberry, CA 93602  
**(559) 855-4003**  
ck@big sandy rancheria.com  
(559) 855-4129 Fax

Cold Springs Rancheria of Mono Indians  
Robert Marquez, Chairperson  
P.O. Box 209 Mono  
Tollhouse, CA 93667  
(559) 855-5043  
559-855-4445 - FAX

North Fork Mono Tribe  
Ron Goode, Chairperson  
13396 Tollhouse Road Mono  
Clovis, CA 93619  
**eagleeye@cuip.net**  
(559) 299-3729 Home

Dumna Wo-Wah Tribal Government  
Keith F. Turner, Tribal Contact  
P.O. Box 306 Dumna/Foothill  
Auberry, CA 93602 Mono  
t'si-akimcorr@at.net  
(559) 855-3128 Home  
(559) 696-0191 (Cell)

Table Mountain Rancheria  
Bob Pennell, Cultural Resources Director  
P.O. Box 410 Yokuts  
Friant, CA 93626-0177  
(559) 325-0351  
(559) 217-9718 - cell  
(559) 325-0394 FAX

Kings River Choinumni Farm Tribe  
John Davis, Chairman  
1064 Oxford Avenue Foothill Yokuts  
Clovis, CA 93612-2211 Choinumni  
(669) 307-6430

Dunlap Band of Mono Historical Preservation Soc  
Mandy Marine, Board Chairperson  
P.O. Box 18 Mono  
Dunlap, CA 93621  
mandy\_marine@hotmail.  
com  
559-274-1705  
559-252-0198 - fax

Esohm Valley Band of Indians/Wuksache Tribe  
Kenneth Woodrow, Chairperson  
1179 Rock Haven Ct. Foothill Yokuts  
Salinas, CA 93906 Mono  
kwood8934@aol.com  
831-443-9702

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.

This list is only applicable for contacting local Native Americans for consultation purposes with regard to cultural resources impact by the proposed SCH#2008031002; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Roeding Regional Park and Fresno Chaffee Zoo Facilities Master Plans Project; located in the southwestern portion of the City of Fresno; Fresno County, California.

Dumna Wo-Wah Tribal Government  
Jim Redmoon - Cultural Resources Representative  
724 W. Fountain Dumna/Foothill  
Fresno , CA 93705 Choinumni  
559-824-0265  
darkstarmoon@yaho.  
com  
559-243-9926 -home

Frank Marquez  
P.O. Box 565 Mono  
Friant , CA 93626 Foothill Yokut  
francomarquez@pmr.org  
559-213-6543 - cell  
559-822-3785

Chowchilla Tribe of Yokuts  
Jerry Brown  
10553 N. Rice Road North Valley Yokuts  
Fresno , CA 93720  
559-434-3160

The Choinumni Tribe of Yokuts  
Rosemary Smith, Chairperson  
1505 Barstow Choinumni  
Clovis , CA 96311 Foothill YoKut  
**monoclovis@yahoo.com**  
559-862-5757

Traditional Choinumni Tribe  
David Alvarez, Chairperson  
2415 E. Houston Avenue Choinumni  
Fresno , CA 93720  
davealvarez@sbcglobal.net

(559) 323-6231  
(559) 292-5057 FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.

This list is only applicable for contacting local Native Americans for consultation purposes with regard to cultural resources impact by the proposed SCH#2008031002; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans Project; located in the southwestern portion of the City of Fresno; Fresno County, California.

***Native American Heritage Commission, Dave Singleton - October 28, 2010 (B)***

*Response to Comment B-1*

This comment raises concerns about sufficient consultation with Native American Tribes for the purpose of identifying sensitive cultural areas. The City of Fresno sent letters to nine Native American tribes that had any possibility of having a “most likely decendent” at the project site. Six additional Native American tribes were provided by the Native American Heritage Commission in their NOP comment letter dated March 5, 2008; however, the City did not send letters to these six tribes based on the City Historic Preservation staff’s historical knowledge of tribes within the City area. The City did not receive any responses from the nine tribes that were sent letters that indicated the existence of potential cultural or historical sites (see Appendix B of Draft EIR for copies of these letters). A Sacred Lands File (SLF) search was requested by the City and conducted by the Native American Heritage Commission (NAHC). The NAHC stated, “The SLF search did not indicate the presence of Native American cultural resources within one-half mile of the project area (APE)...” Furthermore, the California Historical Resources Information System (CHRIS) and State of California Department of Parks and Recreation-Historic Preservation and Southern San Joaquin Valley Archeological Information Center determined that there are no known archeological features of significance associated with the Roeding Park site.

## Kevin Fabino

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**From:** Lisa Gymer [LGYMER@dfg.ca.gov]  
**Sent:** Tuesday, November 23, 2010 11:04 AM  
**To:** Kevin Fabino  
**Subject:** Draft EIR Roeding Regional Park Chaffee Zoo Master Plans, SCH# 2008081002

Mr. Fabino,

I am responding to the above Project by email as the closing period for comments is tomorrow. The mitigation measures presented in the Biological Resources sections of the Draft EIR are acceptable to the Department with the following two exceptions which require additional measures.

Mitigation measure 6.2(a) - Bats. Exclusion of bats cannot occur during the breeding season. If bats are occupying the bandstand structure during the breeding season (October 1 through August 31), they must be allowed to remain until after the breeding season has ended, then they can be excluded so work on the bandstand can be undertaken. Occupancy must be determined outside the breeding season as human disturbances during the breeding season can result in a loss of reproductive opportunity or loss of young.

Mitigation Measure 4.1 should include mitigation for the loss of fish species within the existing ponds to address Impact 6.3. If the new ponds are going to be restocked, this should be stated along with replacement numbers and identification of fish species. If the new ponds are not going to be restocked, additional mitigation should be included to address impacts to migratory birds and foraging opportunities lost.

Thank you for allowing us the opportunity to comment on the proposed Project. If you have any questions about the above comments, please contact me at the numbers below.

Lisa Gymer  
Environmental Scientist  
California Department of Fish and Game  
1234 East Shaw Avenue  
Fresno, California 93710  
(559) 243-4014 x238  
[lgymer@dfg.ca.gov](mailto:lgymer@dfg.ca.gov)

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**California Department of Fish and Game, Lisa Gymer - November 23, 2010 (C)**

*Response to Comment C-1*

This comment identified modifications to two mitigation measures provided in Chapter 6, Biological Resources in the Draft EIR. The first modification was to clarify the mitigation of bats that found to inhabit the bandstand, such that they cannot be excluded during the breeding season (October 1 through August 31). The City agrees with the requested clarification. Mitigation Measure 6.2(a) on page 6-11 of the Draft EIR is revised as follows:

- 6.2(a)** Within 30 days prior to the commencement of restoration work on the bandstand, a qualified bat biologist shall conduct a habitat assessment and daytime survey of the bandstand. If no evidence of current bat habitation by the pallid bat or the Townsend's big-eared bat is found, no further action is required. If bat use is noted, then a qualified biologist shall prepare a report that makes recommendations for appropriate measures that will prevent harm to sensitive species of bats. These measures may include exclusion and humane eviction of bats roosting within the structure, partial dismantling of the structure to induce abandonment by bats, or other appropriate measures in coordination with and as approved by CDFG. If the measures are planned to be implemented between September 1 and September 30, no further action is required. If the measures are planned to be implemented during the breeding season (October 1 through August 31), coordination and approval by CDFG is required. The recommended measures shall be incorporated into and implemented as part of the bandstand restoration.

The second requested modification was to clarify that the relocated pond feature would be restocked with fish. The City also agrees with this requested modification. The following revision to Mitigation Measure 4.1 (4.1(a) as revised in Response to Comment O-6) incorporates the requested modification to restock the relocated pond feature with fish as well as a clarification of the intent of Mitigation Measure 4.1(a) to relocate the pond feature as discussed in Response to Comment O-10. Page 4-21 of the Draft EIR is revised as follows.

- 4.1(a)** Maintain the public recreational uses associated with the ponds by introducing a new pond feature in accordance with Mitigation Measure 4.8(a), which states that historic preservation design guidelines shall be developed that address new design in the context of the contributing architectural and landscape features of the potential historic district. A new pond feature shall be located near the Golden State Boulevard entry to the park, such that the pond feature is at least visible and as accessible as they

are in their current location. Historic American Landscape Survey (HALS) documentation of the ponds shall be prepared by a qualified historic preservation professional prior to the demolition of the ponds. The Zoo will consult with the California Department of Fish and Game (CDFG) and will stock the pond feature with fish species recommended by CDFG. ~~Vegetation shall be installed around the ponds to recreate the existing character of the ponds, including lawn area for picnicking, and a mature tree canopy.~~

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 23, 2010

Kevin Fabino  
Planning Manager  
City of Fresno  
2600 Fresno Street  
Fresno, CA 93721

Re: Notice of Completion, Draft Environmental Impact Report (DEIR)  
Roeding Park & Fresno Chaffee Zoo Facility Master Plans  
SCH# 2008031002

Dear Mr. Fabino:

As the state agency responsible for rail safety within California, the California Public Utilities Commission (CPUC or Commission) recommends that development projects proposed near rail corridors be planned with the safety of these corridors in mind. New developments and improvements to existing facilities may increase vehicular traffic volumes, not only on streets and at intersections, but also at at-grade highway-rail crossings. In addition, projects may increase pedestrian traffic at crossings, and elsewhere along rail corridor rights-of-way. Working with CPUC staff early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers.

We have completed our review of the DEIR for the proposed Fresno Chaffee Zoo and Rotary Storyland expansion. Project consultation with the CPUC has been most helpful. The CPUC accepts the project mitigation measures as agreed upon by the project proponents as described below. The CPUC concludes the subject EIR adequately evaluates all potential environmental impacts and that no such impacts occur with the implementation of the proposed mitigation.

- 1.) Installation of vandal resistant fence along Golden State Boulevard from Olive Avenue to Belmont Avenue undercrossing.
- 2.) Installation of sidewalks on both the North and South sides of Olive Avenue at-grade railroad crossing.
- 3.) Installation of Standard 8 warning device (flashing lights without a gate) in the off-quadrant) due to the skewed track configuration of the crossing.
- 4.) A CPUC General Order (GO) 88-B application for the improvements.

It is recommended that the above mitigation measures be included in the mitigation monitoring section of the FEIR and included in the conditions of approval for this project by the City.

D-1

Kevin Fabino  
Planning Manager  
SCH # 2008031002  
November 23, 2010  
Page 2 of 2

The certified environmental documents (FEIR) for the subject entitlements may be used by the Commission for CEQA approval and compliance with all General Order 88-B application requirements as they apply to this project.

Please contact Marvin Kennix, Utilities Engineer, at (916) 928-3809 or email at [mlk@cpuc.ca.gov](mailto:mlk@cpuc.ca.gov) for questions regarding the crossing modification process and General Order requirements by the Commission.

D-1  
CONT

If you have any other questions in this matter, please contact me at (415) 713-0092 or email at [ms2@cpuc.ca.gov](mailto:ms2@cpuc.ca.gov).

Thank you for your consideration of these comments.

Sincerely,

Moses Stites  
Rail Corridor Safety Specialist  
Consumer Protection and Safety Division  
Rail Transit and Crossings Branch  
180 Promenade Circle, Suite 115  
Sacramento, CA 95834-2939

Cc: Dirk Poeschel, Land Development Services

From: Stites, Moses [mailto:moses.stites@cpuc.ca.gov]  
Sent: Friday, October 15, 2010 7:57 AM  
To: David Peters; John Rowland; Kevin Fabino; John Fox  
Cc: Kennix, Marvin L.; Gilbert, Daren S.  
Subject: FW: (8/5/10) Changes to Request for Traffic Study Thresholds of Significance at-grade railroad crossings  
Importance: High

Dave and John,

I have not received the DEIR for Roeding Park as of this date, However I am sure you are aware of the CPUC's serious concerns at this crossing (Olive Ave.) since it does not have sidewalks on either side and there are definitely some serious safety issues that we will be reviewing in the DEIR/Transportation Circulation section once we receive it.

I have discussed this matter with your firm and the City of Fresno and just wanted to have the reassurance that an adequate and sufficient analysis has taken place due to the existing conditions of the crossing and the trip generation of the proposed project, as well as the main entrance relocation to Golden State Blvd across from the tracks.

Also, the CPUC was not consulted on the scope of work for the traffic impact study which in itself leads one to question why? since the CPUC is a responsible agency under CEQA for the review of this project for safety to the at-grade crossings and rail corridor.

I would hate to see the document **recirculated** due to any short comings due to a deficient or fatally flawed analysis or lack-of to the adjacent rail corridor and Olive Avenue at-grade crossing especially when the City has been duly notified on numerous occasions of the CPUC concerns from the onset of the project environmental process.

I will also send you an article regarding legal responsibility for improvements to at-grade crossings which should be of interest to you and the project proponent.

**We request that this document be entered into the public record for this project for future reference.**

D-2

Please advise.

Thank you.

Moses

(415) 713-0092

---

The following format is to be utilized for the analysis of at-grade railroad crossings:

1.) Data Collection-A 12 hour continuous video log will be collected for the subject crossing on two days (Tuesday and Thursday of the same week). The time period of the logs will cover both the AM and PM peak periods and the time between these peak periods (6 a.m. to 6 p.m.), however if in proximity to a shopping or nightlife area, the PM peak could be (6 p.m. to 8 p.m.). From the video logs the following data will be extracted;

- a) the number of crossing activations and the times of activation;
- b) the duration of crossing activation (time the crossing arms are down);
- c) the type of activity causing the activation (freight, passenger, other); and
- d) the length of the vehicular queues that extend toward the track from the intersection during the AM and PM peak hours for roadway traffic;
- e) the length of the vehicular queues on the roadway approaches to the crossing during the AM and PM peak hours for roadway traffic.

2. Analysis-The collected data will be used to perform the following analysis:

D-2  
CONT

a) number of activations, duration of activations, and length of queues during the AM and PM peak hours;

b) effects of the existing activations and queues on adjacent intersections;

c) potential impact of the proposed project's trips (existing and cumulative) to the likelihood of vehicles stopping on the tracks (whether queue extends from the intersection to or beyond the track);

d) potential impact of the proposed project's trips (existing and cumulative) to the length of the vehicular queues on the roadway approaches to the crossing .

3. Recommended Mitigation measures-formulate recommended measures to mitigate any identified impacts of this development traffic on the existing and cumulative peak hour crossing conditions.

D-2  
CONT

**Note: In regard to crossing safety, it is critical to determine whether vehicle queues extend onto the track. If so, mitigation measures may be necessary, such as traffic signal installation, traffic signal preemption, pre-signals, and/or additional signs and markings to stop vehicles prior to the track.**

You can reference the following : 1.) California Manual on Uniform Traffic Control Devices for Streets and Highways (FHWA's MUTCD 2003 Edition, as amended for use in California), Traffic Controls for Highway-rail/Light Rail Transit Grade Crossings. 2.) Railroad-Highway Grade Crossing Handbook (FHWA, 2007). 3.) Caltrans Traffic Impact Study Guide-2002.

Hopefully this information will assist you with the analysis for your project. Keep in mind that there may need to be variations on the format to address concerns at a particular site. If you have any other questions, I can be reached at (415) 713-0092 or by email.

Moses

From: Stites, Moses [mailto:moses.stites@cpuc.ca.gov]  
Sent: Friday, October 15, 2010 8:01 AM  
To: David Peters; John Rowland; Kevin Fabino; John Fox  
Cc: Kennix, Marvin L.; Gilbert, Daren S.  
Subject: FW: C.A. Pares Claims Against PUC in Rail Crossing Accident  
Importance: High

Please note this follows a previous email sent on the Roeding Park DEIR.

Also enter this document into the public record for this project.

Thank you.

Moses

[Metropolitan News-Enterprise](#)

Wednesday, January 27, 2010

Page 1

**C.A. Pares Claims Against PUC in Rail Crossing Accident**

By KENNETH OFGANG, Staff Writer

D-3

The California Public Utilities Commission’s regulatory authority over a railroad crossing does not render it liable for alleged negligence in failing to prevent an accident at the location, the Court of Appeal for this district ruled yesterday.

The ruling by Div. Four bars claims by Julissa Millan that the PUC’s “control” of the Wilmington Ave. crossing in Carson, and its failure to install a gate there, render it liable for the December 2006 truck-train collision that killed Millan’s husband, Union Pacific Railroad Company employee Jeremy Salinas.

The decision allows Millan to go forward with her claim that failure to install the gate violated a mandatory duty on the part of the commission. She is also suing the railroad, the trucking company, the City of Carson, CalTrans, and others.

The accident occurred when a truck driven by Wilson Tubalado for Associated Consolidators Express collided with a train, pinning Salinas—who was operating the train by remote control while riding in the outside portion of a railcar—between the truck and the railcar. He died days later.

Millan’s complaint asserted that the PUC is liable under Government Code Secs. 830(c) and 835, which make public entities generally liable for dangerous conditions on property they own or control. The complaint also alleged liability for breach of a mandatory duty under Sec. 815.6.

The railroad crossing constituted a dangerous condition, the complaint alleged, because the PUC failed to implement a 1989 recommendation, resulting from a multi-agency field review, that a gate be installed. The PUC placed the proposal on a priority list of projects for which federal funding would be sought, but the project was not funded and was removed from the list six years later.

The commission argued in its motion for summary judgment that it did not own or control the crossing. Los Angeles Superior Court Judge William Barry disagreed, saying the commission arguably could have prevented the accident by either installing the gate or closing the intersection to vehicular traffic entirely.

D-3  
CONT

Justice Thomas Willhite, however, writing for the Court of Appeal, said the PUC did not control the crossing as a matter of law.

Regulatory authority does not constitute control, the justice said, citing *Chatman v. Alameda County Flood Control etc. Dist.* (1986) 183 Cal.App.3d 424, in which the court held that a flood control district was not responsible for the escape of water from a culvert located under the landfill on which the plaintiff's home was built.

The court said in that case that while the district was responsible for inspecting the culvert and approving work done on it, this did not amount to control, as might be the case if the district had assumed maintenance responsibility itself.

In a similar case, *Aaitui v. Grande Properties* (1994) 29 Cal.App.4th 1369, Willhite noted, this district's Div. One held that a city's power to inspect and regulate private swimming pools did not subject it to liability for a death by drowning in a privately owned pool at an apartment complex.

D-3  
CONT

Willhite explained:

“Reading *Chatman* and *Aaitui* together, we conclude that the PUC's regulatory authority over the crossing does not establish control of that property within the meaning of section 830. To begin, the PUC does not own the property and holds no interest in it. It is Union Pacific's responsibility to maintain the flashing signals at the crossing. Further, pursuant to the PUC's General Order 72-B, Union Pacific has the responsibility to maintain the crossing and an area two feet outside the tracks and the City of Carson has the responsibility ‘to maintain the approaches and those portions of the crossing not included under [the] railroad[s] responsibility.’ The PUC has no authority to correct any defects (safety or otherwise) associated with the crossing. The PUC can only order others to take prophylactic measures. That General Order 75-D provides that the PUC must give permission to any entity which seeks to change the warning devices at a railroad crossing does not equate with PUC control of the property.”

The justice distinguished *Low v. City of Sacramento* (1970) 7 Cal.App.3d 826, which the trial judge relied on. He explained that in

*Low*, a slip-and-fall case, a county was held to be potentially liable for a slip-and-fall accident that took place on land that the county owned but on which it had granted the city an easement.

In that case, Willhite noted, the county not only owned the land, but actively maintained control by doing maintenance work on it. “Here, in contrast, *no evidence* was offered that the PUC *ever actively* maintained the railroad crossing through any form of maintenance or repair,” the justice said.

The case is *Public Utilities Commission v. Superior Court (Millan)*, B217634.

D-3  
CONT

**California Public Utilities Commission, Moses Stites - November 23, 2010 and October 15, 2010 (D)**

*Response to Comment D-1*

The comment acknowledges that project consultation with the CPUC has already “been most helpful.” The comment generically identifies the potential for projects near existing rail corridors rights-of-way to raise safety issues that require mitigation. As further mitigation for the Project, the commentor identified the need for a fence along Golden State Boulevard to prevent visitors from parking on the east side of the railroad corridor and walking across the railroad to Roeding Park. Impact 8.4 in Chapter 8 identifies this potential safety issue as potentially significant and includes Mitigation Measure 8.4(a) which requires construction of a fence along the east side of Golden State Boulevard to prevent pedestrians from crossing the railroad tracks at mid-block locations. The commentor identified a type of fence and location. The City agrees to clarify the type of fence and location. Mitigation Measure 8.4(a) on page 8-23 is revised as follows.

- 8.4(a)**            The project applicant shall construct a vandal resistant fence along the east side of Golden State Boulevard from Olive Avenue to Belmont Avenue undercrossing, within the right-of-way, to prevent pedestrians from crossing the railroad tracks at mid-block locations.

The implementation of Mitigation Measure 8.4(a) would reduce potential safety impacts associated with the railroad tracks to less than significant.

In addition to the above mitigation measure, the CPUC requested additional measures to further reduce the potential safety impact. Based on discussions among the City, Fresno Chaffee Zoo, and the CPUC, they have agreed to include the following improvements as additional mitigation measures and conditions of approval. The following measures are added after Mitigation Measure 8.4(a) on page 8-23 of the Draft EIR.

- 8.4(b)**            The project applicant shall install a sidewalk on the south and north sides of the Olive Avenue at-grade railroad crossing.
- 8.4(c)**            The project applicant shall install a Standard 8 warning device (flashing lights without a gate) in the off-quadrant due to the skewed track configuration of the crossing.

*Response to Comment D-2*

This comment was provided prior to the commentor receiving the Draft EIR. Subsequent to receiving the Draft EIR, the City of Fresno discussed the safety issues expressed in this comment with the CPUC. Please see Response to Comment D-1 regarding the Olive Avenue at-grade crossing.

***Responses to Comments***

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*Response to Comment D-3*

This comment requests that a news article regarding a rail crossing accident be entered into the public record for this project. No specific comment on the Draft EIR was provided; therefore, no further response is necessary.

**DEPARTMENT OF TRANSPORTATION**

1352 WEST OLIVE AVENUE  
P. O. BOX 12616  
FRESNO, CA 93778-2616  
PHONE (559) 488-4115  
FAX (559) 488-4195  
TTY (559) 488-4066



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November 23, 2010

E  
Page 1 of 2

2131-IGR/CEQA  
6-FRE-99-23.304  
ROEDING REGIONAL PARK AND  
CHAFFEE ZOO MASTER PLANS (DEIR)

SCN# 2008031002

*Clear  
11/24/10  
C*

Mr. Kevin Fabino  
City of Fresno Development Department  
2600 Fresno Street  
Fresno, CA 93721-3604

Dear Mr. Fabino:

We have reviewed the Draft Environmental Impact Report (DEIR) for the Roeding Park and Fresno Chaffee Zoo Facility Master Plan. The project site is adjacent to State Route (SR) 99, between Belmont and Olive Avenues. Caltrans has the following comments:

The traffic study for this proposed master plan for Roeding Regional Park and Chaffee Zoo predicts the proposed expansion would generate 133 additional trips during the morning peak travel periods by the year 2014; and 235 additional trips during the morning peak travel periods by the year 2030.

E-1

Previous traffic studies have indicated a need for signal controls at the two ramp intersections at Olive Avenue in order to accommodate projected future demand. The City of Fresno Traffic Signal Mitigation Impact (TSMI) fee identifies 100% funding for the northbound and southbound ramps at the SR 99/Olive interchange. Furthermore, the City of Fresno has received additional Highway Safety Improvement Program (HSIP) funding for installation of traffic signals at the SR 99/Olive Avenue interchange. The signals are expected to be installed prior to the year 2014.

The traffic study identifies the future need for signal controls for the northbound and southbound ramps at the SR 99/Belmont Avenue interchange. The City of Fresno TSMI fee identifies 100% funding for these two ramp intersections. The traffic study also recommends the project contribute its proportional share for the widening of the SR99/Belmont Avenue overcrossing in order to accommodate left turn storage on the structure. These improvements would provide adequate mitigation to the State Highway System for this project. However, there is substandard interchange spacing between SR 180 and Belmont Avenue and future operational solutions to decrease merging conflicts and improve operations along the SR 99 corridor may need to be considered. This may result in the closing of some interchanges as defined in the Corridor System Management Plan (CSMP) for SR 99 which was completed in April, 2009. It should be

E-2

*"Caltrans improves mobility across California"*

Mr. Kevin Fabino  
November 23, 2010  
Page 2

E  
Page 2 of 2

noted that both Princeton and Belmont Avenue interchanges were identified for possible closure in the CSMP.

Caltrans would like to thank City staff and Project representatives for involving us in the early stages of the Master Plan through to its current status. We appreciate the effort of ensuring the DEIR adequately addressed project related impacts to State facilities. If you have any questions, please call me at (559) 488-4115.

E-2  
CONT

Sincerely,

CHRISTINE COX-KOVACEVICH  
Acting Deputy District Director  
Planning and Local Programs

**Department of Transportation, Christine Cox-Kovacevich - November 23, 2010 (E)**

*Response to Comment E-1*

This comment states that previous studies identified a need for signal controls at the two ramp intersections at Olive Avenue and the signals are expected to be installed prior to the year 2014. The traffic study prepared for the proposed project assumes that the signals at the two ramp intersections at Olive Avenue would be installed prior to the year 2014. As stated on page 8-12 in Chapter 8 of the Draft EIR, the funding for these signal improvements would be provided by the City of Fresno's Traffic Signal Mitigation Impact (TSMI) fees.

This comment also states that the City received additional Highway Safety Improvement Program (HSIP) funding for installation of traffic signals at the SR-99/Olive Avenue interchange. This comment regarding the additional funding source is noted and identified on page 8-13 in Chapter 8 of the Draft EIR. The comment did not raise any significant environmental issues and no further response is required. The comment stated that the identified improvements would provide adequate mitigation to the State Highway system.

*Response to Comment E-2*

This comment states that there is currently substandard interchange spacing between SR-180 and Belmont Avenue and future solutions to decrease merging conflicts and improve operations along SR-99 corridor may need to be considered. The comment further states that some interchanges (i.e., Belmont Avenue and Princeton Avenue) may be closed in the future. The City understands that the future operation of SR-99 is under the jurisdiction of Caltrans and when Caltrans programs the closure of existing interchanges, environmental documentation will be prepared to address potential environmental effects. At this time, Caltrans has not programmed the closure of the Belmont Avenue interchange, and environmental review, without further information such as timing and technical studies, would be premature.

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

1725 23<sup>rd</sup> Street, Suite 100  
SACRAMENTO, CA 95816-7100  
(916) 445-7000 Fax: (916) 445-7053  
calshpo@parks.ca.gov  
www.ohp.parks.ca.gov



November 24, 2010

Kevin Fabino  
Planning Manager  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, CA 93721

- Sent via email and United States Postal Service –

Draft Environmental Impact Report (DEIR) for the Roeding Regional Park Facility Master Plan and Fresno Chaffee Zoo Facility Master Plan

Dear Mr. Fabino:

The State Office of Historic Preservation (OHP) has broad responsibility for the implementation of federal and state historic preservation programs in California. We thank you for the opportunity to comment on the above Draft Environmental Impact Report (DEIR) for the Roeding Regional Park Facility Master Plan and Fresno Chaffee Zoo Facility Master Plan issued under the California Environmental Quality Act (CEQA). We are concerned that the proposed project will have an irreversible significant adverse effect on a historic resource and that the proposed mitigation measures do not sufficiently mitigate the loss of Roeding Park's historic resources and integrity.

As the Lead Agency, the City of Fresno, through its consultant Page & Turnbull, has determined that, "Roeding Regional Park possesses sufficient cultural values to qualify it as a historic district for the California Register of Historical Resources (California Register), and therefore, the property is considered a historic resource under CEQA." According to Page & Turnbull's *Final Roeding Regional Park Historic Resource Assessment*, "The Roeding Regional Park Historic District retains integrity of location, design, setting, materials, workmanship, feeling and association." However, the project includes demolition of six contributing landscape elements to the Historic District and demolition of one architectural contributing element of the District which would severely impact the integrity of the Historic District.

Although the DEIR proposes mitigations for these demolitions, the use of relocation as the primary mitigation does not sufficiently mitigate the loss of integrity to the District as a whole. The proposed mitigations also seek to, "Maintain public recreational uses associated with the ponds by relocating the ponds and recreating the existing character of the ponds." However, these mitigations focus on the recreational uses of the elements and not their importance regarding the District's design and would represent a wholesale loss of integrity regarding location, design and setting for the District. The proposed demolitions would clearly cause, "Substantial adverse change in the

Kevin Fabino  
Page 2

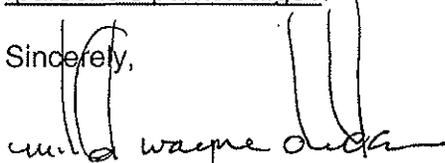
significance of an historical resource [which] means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." (CEQA Guidelines § 15064.5 (b) (1)).

It is our position that the Lead Agency should adopt an alternative that would preserve the Historic District and its defining landscape and architectural resources thus retaining the integrity of the Roeding Park Historic District.

We thank you for the opportunity to comment on the above project. Please understand that our comments herein are specifically related to the environmental review process and adequacy of documents prepared for the environmental review purposes. We do not take positions in support of or against projects, but rather focus on the environmental review process itself.

If you have any further questions, please don't hesitate to contact Ronald Parsons, Historian I, CEQA Coordinator Local Government Unit at (916) 445-7016 or at [rparsons@parks.ca.gov](mailto:rparsons@parks.ca.gov).

Sincerely,



Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer

F-1  
CONT

***California Office of Historic Preservation, Department of Parks and Recreation, Milford Wayne Donaldson - November 23, 2010 (F)***

*Response to Comment F-1*

The comment raises concerns that the proposed project will have an irreversible significant adverse effect on a historic resource and that the proposed mitigation measures do not sufficiently mitigate the loss of Roeding Park's historic resources and integrity. Specifically, the commentor suggests that relocation does not adequately mitigate impacts to the contributing landscape elements within Roeding Park. Subsequent to receiving this comment, the City of Fresno staff talked to the Office of Historic Preservation staff. Through their conversation and documented in Attachment A, the City understood that the role of the Office of Historic Preservation is not to facilitate or opine on mitigations, but to leave that conversation to the local jurisdiction and constituency.

Within the comment, the commentor provides an example of their assertion by stating that the loss of the ponds would impact the integrity of the district and "would represent a wholesale loss of integrity regarding location, design, and setting for the District." The HRA outlines the contributing and non-contributing features of the potential Roeding Park Historic District; the ponds are included among the Park's contributing features. The significance of Roeding Park is linked to the district's unified collection of landscape and architectural features that represent the park's design from 1908 to 1953, as well as its association with municipal park development during this period.

As discussed in Attachment B (Supplemental Historical Analysis) of this Response to Comments Document, Roeding Park is a potential historic district. The potential Roeding Park Historic District is comprised of 45 age-eligible features (23 contributing and 22 non-contributing features) and landscape characteristics that define the overall setting of the potential historic district. As discussed in Attachment B, the four ponds (Ponds A, B, C, and D) are grouped together as a single feature rather than counted as separate resources, as they are in the Draft EIR. Ten contributing resources to the potential historic district would be directly affected by the project. Attachment B addresses the individual historic significance and integrity of the ten resources within the park that would be demolished or altered as part of the proposed project. As discussed in Attachment B, although these resources contribute to the potential historic district, they do not have sufficient historic significance and integrity to qualify as individual historic resources.

The historic resource in question as defined by CEQA is the potential Roeding Park Historic District, not each individual feature within the district. The Supplemental Historical Analysis in Attachment B demonstrates that individual contributing features within the park are not eligible for listing in the National, California, or local registers independent of their inclusion in and contribution to the potential historic district. The demolition, alteration or relocation of the individual contributing features within the park, such as the ponds, would not result in the loss of integrity of the park as a whole, or its eligibility for listing in the National, California or local Register. In addition, the proposed relocation of the pond feature, that is identified in Mitigation Measure 4.1 (4.1(a) as revised

in Response to Comment O-6) in Chapter 4 of the Draft EIR and revised in Response to Comments C-1 and O-10, is to introduce a new pond feature within the park to provide public recreational uses. This introduction of a new pond feature is required to be in accordance with Mitigation Measure 4.8(a) which states that historic preservation design guidelines shall be developed that address new design in the context of the contributing architectural and landscape features of the potential historic district. This introduction of the public recreational use of the pond feature would reduce the potential significant impact on the potential historic district to a level of less than significant. To clarify the intent of Mitigation Measure 4.1(a) (see Response to Comment O-6 for change in Mitigation Measure numbering), this measure on page 4-21 of the Draft EIR is revised as shown in Response to Comment O-10.

From: Acosta-Mena, Theresa [mailto:TAcosta-Mena@co.fresno.ca.us]  
Sent: Monday, November 29, 2010 3:48 PM  
To: Kevin Fabino  
Subject: Fresno Roeding Park Chaffee Zoo Master Plan DEIR

Mr. Fabino the above project was routed to the various Divisions of the County's Department of Public Works and Planning for review and comment. We have no comments to offer. Thank you for giving us the opportunity to review and comment on the project. Due to a Department Furlough on November 24, 2010 I was not able to submit comments to you until today.

G-1

M. Theresa Acosta-Mena

Senior Planner

Environmental Analysis Unit

Development Service Division

Department of Public Works and Planning

Ph. (559) 600-4228

tacosta-mena@co.fresno.ca.us

Fax. (559) 600-4200

***County of Fresno, Planning and Public Works Department, Theresa Acosta-Mena - November 29, 2010 (G)***

*Response to Comment G-1*

This comment states the County Public Works and Planning Department have no comments on the Draft EIR. Since no specific comments on the Draft EIR were provided, no further response is necessary.



# County of Fresno

Department of Public Health  
Edward L. Moreno, M.D., M.P.H., Director-Health Officer

October 19, 2010

FA0169123  
FA0280249  
LU0014715  
PE 2600

Kevin Fabino  
City of Fresno  
Development Department  
2600 Fresno Street  
Fresno, CA 93721

Dear Mr. Fabino:

**SUBJECT:** DEIR for Roeding Regional Park and Fresno Chaffee Zoo Master Plans.  
**LOCATION:** City of Fresno Roeding Regional Park, Fresno.

The Fresno County Department of Public Health, Environmental Health Division has reviewed the DEIR for the proposed project and concurs with the information contained therein. This Department would appreciate the opportunity to review the final EIR and requests inclusion in its routing. (electronic preferred)

H-1

If I can be of further assistance, please contact me at (559) 445-3357.

Sincerely,

**Glenn Allen**

Digitally signed by Glenn Allen  
DN: cn=Glenn Allen, o=Environmental Health  
Division, ou=Public Health, email=glallen@co.  
fresno.ca.us, c=US  
Date: 2010.10.19 11:16:50 -07'00'

R.E.H.S., M.S.  
Supervising Environmental Health Specialist  
Environmental Health Division

ga

DEIR for Roeding Regional Park and Fresno Chaffee Zoo

***County of Fresno, Public Health Department, Glenn Allen - October 19, 2010 (H)***

*Response to Comment H-1*

This comment states the County of Fresno, Department of Public Health has reviewed the Draft EIR and concurs with the information contained therein. Since no specific comments on the Draft EIR were provided, no further response is necessary.



FRESNO METROPOLITAN FLOOD CONTROL DISTRICT

File 170.25, 210.41  
550.30 (Roeding Regional Park)

November 22, 2010

Kevin Fabino, Planning Manager  
City of Fresno, Planning and Development Department  
2600 Fresno Street  
Fresno, CA 93721

Dear Mr. Fabino,

**FMFCD comments to the Draft Environmental Impact Report  
for the Roeding Regional Park Facility Master Plan  
and Fresno Chaffee Zoo Facility Master Plan**

The District has reviewed the subject Draft Environmental Impact Report and finds that the majority of the District's comments, in the letter dated July 29, 2009, have been incorporated in the report and are still applicable.

However, the District requests that the following comment be incorporated into the Draft Environmental Impact Report as follows:

- 1) The DEIR, Chapter 1, Table 1-1, Page 1-5 in the Summary of Environmental Issues Raised in Comment Letter column, the following information should be added:

Without a relief system to the City's proposed pond there will be an impact to the District's system when rain totals exceed the proposed basin standards.

The District will need to review and approve the final improvement plans for all development (i.e. grading, street improvement) within the Roeding Regional Park and Chaffee Zoo Master Plans to insure consistency with and that there are no impacts to the approved Storm Drainage Master Plan.

Thank you for the opportunity to comment. Please keep our office informed on the development of this project. If you should you have any questions or comments, please contact the District at (559) 456-3292.

Sincerely,

Rick Lyons  
Engineering Technician III

RL/lrl

K:\Environmental impact report letters\deir roeding regional park-zoo master plan(rl).doc

**Fresno Metropolitan Flood Control District, Rick Lyons - November 22, 2010 (I)**

**Response to Comment I-1**

This comment states that a relief system to the proposed storm drainage basin should be included in the project design. As stated on page 14-10 of the Draft EIR, the storm drainage basin is proposed to retain runoff from a 6-inch rainfall on the project site. This design is a required standard by the Fresno Metropolitan Flood Control District. Therefore, the proposed storm drainage basin meets the required FMFCD standard for a disposal system.

Although not required, Fresno Chaffee Zoo has agreed to include a relief system for the proposed storm drainage facility. The relief system would include the installation of a siphon at the southeast corner of the proposed basin (i.e., at the intersection of Franklin Avenue and Pacific Avenue) and installing a pipeline approximately 500 feet in the Franklin Avenue right-of-way to the existing underground Fresno Metropolitan Flood Control District (FMFCD) pipeline located at the intersection of Franklin Avenue and Humboldt Avenue. This underground pipeline is connected to the FMFCD retention Basin RR-1. This proposed relief system would be used if there is a storm that exceed the FMFCD's retention basin design requirements (i.e., runoff from 6-inches of rainfall over 10 days).

The following is added as an additional mitigation measure for Impact 14.2 on page 14-10 of the Draft EIR; however, the finding of less than significant after mitigation is the same with or without the following mitigation measure.

**14.2(b)**            The Fresno Chaffee Zoo shall coordinate with the City and the Fresno Metropolitan Flood Control District to implement a relief system for the proposed storm drainage facility. The relief system will include the installation of a siphon at the southeast corner of the proposed basin (i.e., at the intersection of Franklin Avenue and Pacific Avenue) and installation of a pipeline approximately 500 feet in the Franklin Avenue right-of-way to the existing underground Fresno Metropolitan Flood Control District (FMFCD) pipeline located at the intersection of Franklin Avenue and Humboldt Avenue. The relief system shall be subject to approval by the FMFCD.

This comment also requested clarification of the District's relief system request within their comments on the Notice of Preparation (NOP). Their NOP comment letter asked that the proposed project "Designate how a relief system for the proposed Basin will operate without hindering the District's system." As discussed in Impact 14.2 on page 14-10 of the Draft EIR, the proposed storm drainage disposal system (i.e., retention basin) would retain the runoff from a 6-inch rainfall on the project site. This runoff capacity is a FMFCD standard for retention basins; and therefore, the project would meet FMFCD's retention basin standard.



November 23, 2010

J  
Page 1 of 2

Kevin Fabino, Planning Manager  
City of Fresno  
Development and Resources Management  
2600 Fresno Street  
Fresno, CA 93721

**Project: Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans  
(SCH# 2008031002)**

**District CEQA Reference No: 20100792**

Dear Mr. Fabino:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed modifications to Roeding Park, Chaffee Zoo, Rotary Storyland, and Playland facilities. The project proposes to expand the Chaffee Zoo, Rotary Storyland and Playland facilities within the existing boundaries of Roeding Park. The District offers the following comments:

1. Based upon information presented in the DEIR, the criteria pollutant emissions analysis appropriately characterizes the project's construction and operational emissions and their potential impacts on air quality. The District finds that it has no basis on which to disagree with the City's determination that impacts from project specific criteria pollutant emissions would be below the District's significance thresholds of 10 tons per year NOx, 10 tons per year ROG, and 15 tons per year PM10. J-1
2. The project incorporates many favorable design elements and mitigation measures, such as purchasing low- or no-emission vehicles upon vehicle replacement, cooler parking facilities, bike/pedestrian trails, bicycling parking, and transit oriented development. The District appreciates the City's efforts to reduce the project's impacts on air quality.
3. The discussion on impacts resulting from GHG emissions states that the District has not developed Best Performance Standards (BPS) that would apply to this project J-2

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

The District recommends that the discussion be revised to more correctly state that per the District document, *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA*, development projects that reduce GHG emissions by 29%, compared to business as usual, would be considered to have a less than cumulatively significant impact on global climate change.

J-2  
CONT

4. The proposed project exceeds 20,000 square feet of recreational space. Therefore, the District concludes that the proposed project is subject to District Rule 9510 (Indirect Source Review). District Rule 9510 is intended to mitigate a project's impact on air quality through project design elements or by payment of applicable off-site mitigation fees. Any applicant subject to District Rule 9510 is required to submit an Air Impact Assessment (AIA) application to the District no later than applying for final discretionary approval, and to pay any applicable off-site mitigation fees before issuance of the first building permit.

J-3

The DEIR indicates that the phased development of the Master Plans will require future discretionary approvals. For each phase of development, the District recommends that demonstration of compliance with District Rule 9510, including payment of all applicable fees before issuance of the first grading/building permit, be made a condition of project approval. Information about how to comply with District Rule 9510 can be found online at: <http://www.valleyair.org/ISR/ISRHome.htm>.

5. The District appreciates the City's proactive efforts to consult with the District; identifying opportunities to reduce project related emissions and improving the overall assessment of project related impacts on air quality.

J-4

If you have any questions or require further information, please call Jessica Willis at (559) 230-5818.

Sincerely,

David Warner  
Director of Permit Services



Arnaud Marjollet  
Permit Services Manager



DW:jw

Cc: File

**Jessica R. Willis, San Joaquin Air Pollution Control District - November 23, 2010 (J)**

*Response to Comment J-1*

This comment concurs with the evaluation of criteria pollutant emissions as well as the design elements and mitigation measures provided in the Draft EIR. No further response is necessary.

*Response to Comment J-2*

This comment requests that the Draft EIR clarify the District's guidance that a development project be considered to have a less than cumulatively significant impact on global climate change when the project would reduce GHG emissions by 29 percent compared to "business as usual." Therefore, the fourth full paragraph on page 10-27 in Chapter 10 of the Draft EIR is revised to read as follows:

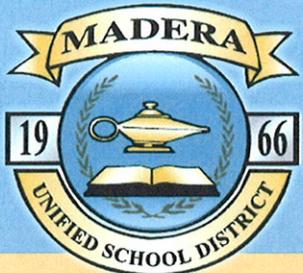
There is no approved greenhouse gas emission reduction plan or program for the project. ~~In addition, However,~~ the SJVAPCD's "Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA" states that development projects that reduce GHG emissions by 29 percent, compared to business as usual, would be considered to have a less than cumulatively significant impact on global change. ~~has not yet provided best performance standards for this type of project. Therefore, the project would need to reduce greenhouse gas emissions by 29 percent compared with business as usual.~~ This reduction in GHG emissions can be taken through project design features, mitigation measures in other impact areas, greenhouse gas mitigation measures, and future regulations.

*Response to Comment J-3*

This comment states that the proposed project is subject to Rule 9510 (Indirect Source Review). This is consistent with the statement in last full paragraph on page 10-42 in Chapter 10 of the Draft EIR. This comment also requests that payment of all applicable District Rule 9510 fees be provided before issuance of the first grading/building permit. The City will be including this requirement in the conditions of approval.

*Response to Comment J-4*

This comment states that the District appreciates that the City provided proactive efforts to consult with the District. The comment does not raise a significant environmental issue, and no further response is required.



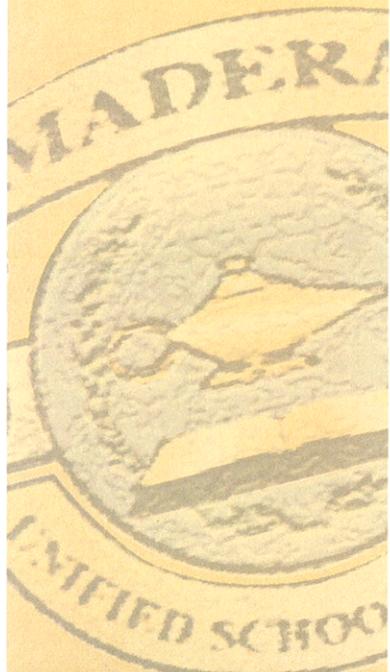
# MADERA UNIFIED SCHOOL DISTRICT

1902 Howard Road  
Madera, CA 93637  
(559) 675-4500  
Fax: (559) 675-1186  
www.madera.k12.ca.us

**John R. Stafford**  
Superintendent  
stafford\_j@madera.k12.ca.us

**Jake Bragonier**  
Public Information Officer  
bragonier\_j@madera.k12.ca.us

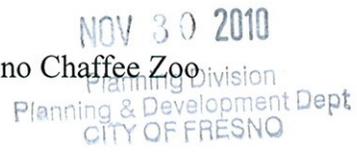
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Where the futures of children  
are driven by their  
aspirations, not bound by  
their circumstances.

November 22, 2010

Mr. John Dugan, Director  
City of Fresno  
Development & Resources Management Department  
2600 Fresno St.  
Fresno, CA 93721



SUBJECT: Roeding Regional Park and Fresno Chaffee Zoo

Dear Mr. Dugan:

Madera Unified School District (MUSD) would like to take this opportunity to express its support of the Roeding Regional Park and Fresno Chaffee Zoo project that is before you. MUSD supports the project for the reasons detailed below:

MUSD is comprised of 24 schools representing 15 elementary schools, 3 intermediate schools, 3 high schools, Pre-Schools and adult school. MUSD serves over 19,000 students from a wide range of ethnic groups and income levels. MUSD has a large percentage of children from below-average income families. MUSD has long been committed to advancing the opportunities for its students to be exposed to the sciences and arts. We believe that the future of children is driven by their aspirations and not bound by their circumstances.

The Fresno Chaffee Zoo expansion will provide a unique learning experience for our students. The proposed Zoo expansion will provide extensive scientific, biological and arts experiences for our students, many of which would not be exposed to these educational resources if not provided by the Zoo. Specifically the Zoo will include new facilities, habitats, interpretive packages and programming to display the Zoo's efforts in animal conservation, science and education. Further, the Zoo, Roeding Park, Rotary Playland and Storyland provide recreational opportunities outside of the school environment in a family setting.

Thank you for this opportunity to comment on this matter.

Sincerely,

John R. Stafford, Superintendent

c: Mr. Scott Barton  
Mr. Dirk Poeschel, AICP

K-1

***Madera Unified School District, John R. Stafford - November 22, 2010 (K)***

*Response to Comment K-1*

This comment expresses Madera Unified Schools District's support for the Fresno Chaffee Zoo expansion. No specific comments on the Draft EIR are provided; therefore, no further response is required.



## HALS

Historic American Landscape Survey  
Northern California Chapter  
444 17th Street, Oakland, CA 94612  
Telephone: 510/465-1284

Mr. Kevin Fabino, Planning Manager  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, California 93721-3604

November 9, 2010

Dear Mr. Fabio,

The members of the Northern California chapter of the Historic American Landscapes Survey (HALS) have learned of the proposed expansion of the Chaffee Zoo in Roeding Park, and we are concerned that the proposed changes will negatively impact the park.

HALS is a national program created in 2000 to document our nation's cultural resources, and to raise public awareness of, and appreciation for these national treasures. Our group identified Roeding Park as a historic resource several years ago, and we understand that the park has now been designated as California's 59<sup>th</sup> HALS site - congratulations for receiving this recognition.

The residents of Fresno, and of our state, are fortunate that the city had the foresight to accept the donation of land from the Roeding family, and to have invested the effort to develop a wonderful park, that for over 100 years has provided residents a place to enjoy the open space, extraordinary collection of heritage trees, picnicking, tennis, fishing and other recreation activities.

We maintain that the greatest value of this park lies in its existing open expanses of lawn and trees. Currently the zoo and its associated parking are settled into a portion the park, which works reasonably well. The proposal would alter this relationship, making the experience of open parkland secondary to other uses. The additions of Playland in 1955, Storyland in 1962, the dog park and the expansion of the tennis courts complex have already removed large portions of land - evidence of the gradual chipping away of open space within this park. These intrusions and loss of open space typically occur over long periods of time such that the gradual transition makes it difficult to fully recognize the cumulative impact of the loss.

Few cities in the country enjoy the benefits offered by such a sizeable park and the amenities they offer. Often park land is seen as available open space - ready to be filled up with buildings and other structures. Parks such as Golden Gate Park in San Francisco, Central Park and Battery Park (both in New York) are important to the experience of a great city. There is significant documentation that well designed and managed parks improve property values, and create community pride.

Chapter Founders ■ Betsy Flack ■ Cathy Garrett ■ Chris Pattillo

L-1

Certainly the aging zoo is in need of rejuvenation, but not by the loss of the open space and tree canopy. It is possible to achieve improvements to the zoo without the insensitive intrusion currently proposed. Our organization believes that the entire site requires analysis of the characteristics that make a great park experience. By conducting a careful study of the park with a view to retaining its most valuable attributes, a more sensitive solution can be forged. We believe that the proposed changes as illustrated in the "Illustrative Roeding Park Facility Master Plan" would significantly, negatively, and irrevocably alter the character and feeling of Roeding Park.

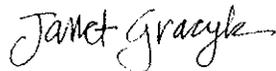
In his book "The Last Landscape" William Whyte describes the forces that threaten our country's parks and open spaces. He advocates that, "What is needed is a basic policy statute declaring that parkland serves one of the highest public purposes and should not be taken unless there is no alternative - and that the burden of proving there is no alternative should be on the taker."

L-1  
CONT

We urge you to consider these observations during your deliberations, and we offer the expertise of our professional membership, if we can assist you in any way. Our organization includes qualified landscape architects from throughout California, and other allied professionals.

It is not that Fresno is going too far with this proposal; it is that the city is not going far enough.

Yours truly,



Janet Gracyk  
Chair, HALS, Northern California Chapter

CC:  
City of Fresno Historic Preservation Committee  
Secretary Ken Salazar - U.S. Department of the Interior  
Paul Dolinsky - Historic American Landscapes Survey  
Governor Arnold Schwarzenegger  
M. Wayne Donaldson, FAIA - State Historic Preservation Officer  
Jerry Brown - California Attorney General/Governor Elect  
Director Ruth Coleman - California State Parks  
Patty Keating - Office of Grants and Local Services  
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Supervisor Debbie Poochigian - County of Fresno  
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Lee Brand - Fresno City Council  
Mike Dages - Fresno City Council  
Henry T. Perea - Fresno City Council  
Cynthia Sterling - Fresno City Council  
Larry Westerlund - Fresno City Council  
Blong Xiong - Fresno City Council  
City of Fresno Historic Preservation Commission

**Historic American Landscape Survey, Janet Gracyk - November 9, 2010 (L)**

*Response to Comment L-1*

This comment urges the city to study the park with a view to retaining its most valuable attributes. The letter articulates policy and substantive issues. It does not express any particular concerns with the adequacy of the analysis or mitigation in the Draft EIR, or otherwise request modifications to the Draft EIR. Further, staff contacted the commentor to request a meeting to follow up on and elucidate any concerns with the Draft EIR, and the commentor declined on December 7, 2010 (see Attachment C), deferring to its November 9, 2010 letter, and views that are expressed by other commentors. Because the comment is general in nature, only a general response is required. (*Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4<sup>th</sup> 357.) Accordingly, the commentor is directed to review the project design elements and mitigation measures that are specifically intended to create a large lawn area with the implementation of the Great Lawn in the northeastern portion of the park and preserve tree canopies by implementing Mitigation Measure 5.2(b) which requires the limitation of the removal of trees that have a breast height diameter of greater than 6-inches. In addition, Mitigation Measure 5.2(a) includes tree replacement ratios to create tree canopies. The commentor is also directed to review the Draft EIR's analysis of associated impacts of alternatives to the proposed project. No specific comments on the Draft EIR are provided in this comment; therefore, no further response is required

JND  
11/23/10



**EAST FRESNO ROTARY**  
FRESNO, CALIFORNIA USA



M  
Page 1 of 1

November 17, 2010

John Dugan  
City of Fresno  
Development & Resources Management Department  
2600 Fresno Street  
Fresno, CA. 93721

RE: Rotary Storyland/Playland expansion

On behalf of the East Fresno Rotary Club, I would like to express our support for the proposed expansion of Rotary Storyland/Playland as well as the Chaffee Zoo. These important community facilities need to be updated and improved in order to fully benefit the people of our area. Our club has invested countless hours and hundreds of thousands of dollars in these facilities since 1956, and it is critical that the process of improvement and expansion continue so that more people can take advantage of the recreational and educational opportunities that are presented within the venues.

Roeding Park and the various facilities within it are a magnificent resource for our community and the surrounding region. Failure to continue to invest in the improvement of the Park and its facilities would result in a huge loss to the people of our area, many of whom are among the poorest of our citizens. The East Fresno Rotary Club stands ready to provide further assistance as needed and we look forward to the continuing partnership between Rotary Storyland/Playland and the City of Fresno to make the Roeding Park destination truly world class.

M-1

Thanks for your attention.

Sincerely,

Rick Leas  
President  
East Fresno Rotary Club  
2010-2011

Cc: Barry Falke  
Scott Barton

***East Fresno Rotary, Rick Leas - November 17, 2010 (M)***

*Response to Comment M-1*

This comment expresses East Fresno Rotary's support for the Fresno Chaffee Zoo expansion. No specific comments on the Draft EIR are provided; therefore, no further response is necessary.



**CENTRAL UNIFIED SCHOOL DISTRICT**  
4605 North Polk Avenue · Fresno, CA 93722  
Phone: (559) 274-4700 · Fax: (559) 271-8200

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**SUPERINTENDENT**  
Michael A. Berg

*JWB 11/23/10*

November 17, 2010

Mr. John Dugan  
Director  
City of Fresno  
Development & Resources Management Department  
2600 Fresno Street  
Fresno, CA 93721

N  
Page 1 of 1

Subject: Roeding Park and Fresno Chaffee Zoo

Dear Mr. Dugan,

The purpose of this letter is to express Central's strong support for the expansion of the Fresno Chaffee Zoo. The Central Unified School District is the fastest growing district in the Fresno metropolitan area. Our enrollment is diverse with a high percentage of underprivileged families and children. With 21 schools and over 14,500 students, our limited resources are precious.

That said, the zoo expansion project is of critical importance to Fresno and the surrounding area as an educational resource. Thousands of our students enjoy annual study trips to the zoo. We see the zoo as a fundamental extension of the learning we deliver in our schools. The living laboratory setting that the expanded zoo will provide will serve as an extension to our programs and facilities. The taxpayers of our community will benefit from the synergy of talent, program, and resources of several community organizations rather than the redundant, parallel delivery of services we've suffered in years past.

N-1

The zoo, Storyland/Playland, and remaining park will provide a unique balance of learning, entertainment, and family recreation in a multi-use setting.

The zoo and park are an asset today, but the master-planned improvements will make the complex, the standard by which others will be judged.

Thank you in advance for consideration of our comments and support.

Sincerely,

Michael A. Berg  
Superintendent

*District Administration*  
Laurel Ashlock, Ed.D., Assistant Superintendent, Chief Academic Officer · James H. Bauler, Assistant Superintendent, Chief Business Officer  
Chris Williams, Assistant Superintendent, Human Resources · Valerie Johnson, Administrator, Special Education and Support Services  
Caran Resciniti, Administrator, 7-12 Education · Kevin Wagner, Administrator, Human Resources and Child Welfare and Attendance  
Paul Birrell, Director, 9-12 & Adult Education · Karen Garlick, Director, K-6 Education

***Central Unified School District, Michael A. Berg - November 17, 2010 (N)***

*Response to Comment N-1*

This comment expresses Central Unified School District's support for the Fresno Chaffee Zoo expansion. No specific comments on the Draft EIR are provided; therefore, no further response is necessary.



Development and Resource Management

2600 Fresno Street, Third Floor, Room 3065  
Fresno, California 93721-3604  
(559) 621-8003, FAX (559) 498-1012

John M. Dugan, AICP  
Director

November 22, 2010

*Please Reply To:*  
Karana Hattersley-Drayton  
(559) 621-8520

Kevin E. Fabino, Planning Manager  
Development and Resource Management Department  
City of Fresno  
2600 Fresno Street – Room 3065  
Fresno, California 93721-3604

SUBJECT: COMMENTS FROM THE HISTORIC PRESERVATION COMMISSION ON THE  
ROEDING REGIONAL PARK AND FRESNO CHAFFEE ZOO FACILITY MASTER  
PLANS AND ENVIRONMENTAL IMPACT REPORT, SCH NO. 2008031002,  
DATED OCTOBER 7, 2010

Dear Mr. Fabino:

Thank you for the opportunity to review the Draft Environmental Impact Report (SCH. No. 2008031002). The Historic Preservation Commission at its regularly scheduled meetings of October 25 and November 15, 2010, received a staff report, accepted public testimony and independently discussed and formulated comments pursuant to FMC 12-1606(b)(5)(6). The Commission has directed staff to prepare the following comments for your consideration.

1. We know that there is the possibility that the High Speed Rail Project may impact the park based upon the alignment selection. Can information be provided which addresses this issue? O-1
2. Can information be provided which addresses how the "less than significant" conclusion was drawn related to the relocation/recreation of the ponds from their existing location to the newly proposed area along Golden State Boulevard? O-2
3. We believe the trees are a valuable asset to the park. Related to preservation of trees can greater emphasis be placed upon the statement in Mitigation Measure 5.2, to preserve and protect in place? We also suggest that as an additional mitigation measure the City develop a plan and contract for the maintenance of the urban forest at Roeding Park. This plan would include a 10-15 year cycle for replenishing the understory and would encourage new plantings using seeds and cuttings from established historic-era trees. O-3
4. The EIR mitigation measure requires a replacement of trees to be of the same species and at a ratio of 1 to 5 trees lost. How does this standard compare to protocols and recommendations of the Arboricultural Association (<http://www.trees.org.uk/aa/news/National-Amenity-Arboriculture-Conference-Programme-Launched-9.html>)? O-4
5. Are there other areas in the park that are less historically significant or less sensitive and which would be better for the relocation of the ponds? O-5

6. We recommend that the City develop a mitigation measure for the restoration of extant historic-era structures, such as the streetcar pavilion and that the City identify a dedicated funding stream for the maintenance of these park buildings.

O-6

7. The consultants have used the issue of continuous change over the history of the park as justification for the further demolition of the historic landscape. If there have been significant changes in the earlier years of Roeding Park, doesn't that make what remains even more precious and important?

O-7

8. Will the Historic Preservation Commission review any and all demolition permits that are requested for historic resources within Roeding Park?

O-8

9. Are there alternative areas/sites within the Roeding Park Master Plan which can accommodate zoo expansion, such as the 1954 addition, or the tennis court area, which may be of less historic significance than the Belmont Avenue landscape and water features?"

O-9

10. Please define the difference between the terms "relocation" and "reconstruction" in regards to historic landscape features. And please explain the decision to use the term "relocation" rather than "reconstruction" to describe the proposal to "move" the Belmont Avenue ponds to the Golden State site. Will such "relocated" features still qualify as historic resources, and will they still be contributors to the proposed historic district?

O-10

If you have any questions, please feel free to contact Historic Preservation Commission staff, Karana-Hattersley-Drayton, Project Manager at (559) 621-8520, or [Karana.Hattersley-Drayton@fresno.gov](mailto:Karana.Hattersley-Drayton@fresno.gov)

Sincerely,



Don Simmons, Ph.D.  
Chair  
Historic Preservation Commission  
City of Fresno

***Fresno Historic Preservation Commission, Don Simmons, Ph.D. - November 22, 2010 (O)***

*Response to Comment O-1*

This comment identified that there is a possibility that the High Speed Rail Project may impact Roeding Regional Park based on the alignment selection. The commentor requested information to address the High Speed Rail.

The California High Speed Rail Authority (CHSRA) was established in 1996 to plan, design, and ultimately construct and operate a state-of-the-art high speed train system stretching from Sacramento to San Diego, and between San Francisco, San Jose, and Oakland. By 2000, CHSRA had developed investment-grade forecasts of ridership, revenue, cost, and benefits of the system. In 2004, CHSRA and the Federal Railroad Administration issued a Draft Program Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and in November 2005 the EIR/EIS was certified.

In October 2007, the City of Fresno completed a Downtown Transportation and Infrastructure Study (DTIS) which addressed the prospect of both high-speed rail and railroad consolidation. The study acknowledged that the City does not have control over decisions concerning the implementation of either of these projects, and that neither project is currently funded, thereby making these projects, "major unknowns at this point in time."

In November 2008, Proposition 1A, which called for \$9 billion to be allocated for implementing the high speed rail system and \$950 million to be used for improvements to other rail services that connect to the high-speed train service, passed with 52.6 percent of the vote. The monies are to be raised through general obligation bonds that are paid off over a 30-year period.

The Fresno to Merced portion of the HSR project is currently in design and environmental analysis phase. The CHSRA released a Draft Scoping Report in January 2010, a Preliminary Report in April 2010, and a Supplemental Alternatives Analysis Report in August 2010. Each of these reports identify the portion of the Merced-to-Fresno segment of the HSR that is located in the vicinity of Roeding Regional Park to be aligned adjacent to the Union Pacific Railroad (UPRR) tracks. Based on information that has been provided to the City of Fresno, there are two alternative alignments adjacent to the UPRR tracks. One alignment is located east of the UPRR tracks and the second alignment is located on the west side of the UPRR tracks. At this time the specific route and whether the HSR would be at-grade or elevated is unknown and potential impacts associated with the High Speed Rail project would require speculation.

*Response to Comment O-2*

This comment includes a request for additional information about how the "less than significant" conclusion was drawn related to the relocation/re-creation of the ponds. As stated on page 4-20 in the Draft EIR, the demolition of ponds A, B, C, D will adversely affect the overall ability of the potential historic district to convey its significance by eliminating a major historic recreational use within the potential historic district, and will affect the district's eligibility for listing in the California Register

of Historical Resources. Since the loss of the recreational use would cause a significant impact, Mitigation Measure 4.1 (4.1(a) as revised in Response to Comment O-6 and further revised in Response to Comments C-1 and O-10) includes the relocation of the pond feature to introduce the recreational use of the pond feature within the potential historic district. Please see Response to Comment O-10 regarding the development of historic preservation guidelines for the new pond feature.

With the implementation of Mitigation Measure 4.1(a), the resulting impact is less than significant, in part because the ponds have not retained sufficient significance or integrity to be considered a historical resource in and of themselves, and therefore any loss of the pond feature is not the loss of a historic resource (see Attachment B). Furthermore, the introduction of a new pond feature will become a non-contributing feature of the potential historic district.

*Response to Comment O-3*

This comment expresses that the trees are a valuable asset to the park. The comment requests that greater emphasis be placed upon Mitigation Measure 5.2 in regards to preserving and protecting trees in place. At this time, the number of trees that are estimated to be removed in Chapter 5 of the Draft EIR is a conservative estimate. Detailed grading plans have not been prepared to identify a specific number of trees that will be removed. Given that the tree replacement ratios in Mitigation Measure 5.2(a) increase as the tree breast height and tree height increase, these increases in tree replacement will be incentive to protect in place as many trees that are not currently dead or severely diseased as possible. The decision for tree removal will be based on the ability of the existing trees to accommodate future grading and construction of the proposed improvements. Trees can be protected in place if they do not substantially hinder the design of the proposed improvements.

This comment also includes a recommendation to include an additional mitigation measure to plan and contract for the maintenance of the urban forest at Roeding Park. To ensure maintenance of the relocated and replacement trees, Mitigation Measure 5.2(a) on pages 5-26 and 5-27 of the Draft EIR has been modified as shown below.

**5.2(a)** Any tree within the area of Roeding Regional Park affected by the Master Plans Project and is not currently dead or severely diseased (i.e., currently estimated at 710 trees), shall be (1) preserved at its present location; (2) relocated to another location within Roeding Regional Park; or (3) replaced by the same species of tree at a ratio of between 1.0 to 5.0 trees per tree lost, depending on the size of the tree, as identified below in Table 5-4.

In addition, any tree within the area of Roeding Regional Park affected by the Master Plans Project and is currently dead or severely diseased (i.e., currently estimated at 101 trees), shall be replaced by the same species of

tree at a ratio of between 1.0 to 5.0 trees per tree lost, depending on the size of the tree, as identified below in Table 5-4.

**Table 5-4: Roeding Regional Park Tree Replacement Ratios**

Height (in feet)	Tree Breast Height Diameter (in inches)					
	0"-6"	7"-12"	13"-18"	19"-24"	25"-30"	30"+
0'-15'	1.0	1.0	1.5	2.0	2.5	3.0
16'-30'	1.0	1.5	2.0	2.5	3.0	3.5
31'-45'	1.5	2.0	2.5	3.0	3.5	4.0
46'-60'	2.0	2.5	3.0	3.5	4.0	4.5
61'+	2.5	3.0	3.5	4.0	4.5	5.0

Source: ArborPro, Inc.

A landscape plan shall be prepared in consultation with a certified arborist. The size of the replacement trees will be determined by the landscape architect and approved by the Development and Resources Management Department. After installation of the relocated and replacement trees, periodic monitoring shall occur to ensure the survival of the trees. For trees that are relocated and do not survive within the first two years of replacement, these trees shall be replaced by the same species of tree at the ratio shown in Table 5-4. For replacement trees that do not survive within the first two years of replacement, these trees shall be replaced by the same species of tree.

Subsequent to the first two years of replacement or relocation, there shall be a periodic maintenance of the trees. A maintenance plan shall be prepared by a certified arborist and include pruning, fertilization, irrigation, and pest management to maintain the health of the trees.

*Response to Comment O-4*

This comment includes a request to compare the mitigation measure regarding tree replacement ratio (see Table 5-4 in Chapter 5 in the Draft EIR) to the protocols and recommendations of the Arboricultural Association. The National Park Service Guide to Cultural Landscape Reports and Secretary of the Interior’s Standards for the Treatment of Cultural Landscapes were followed in the evaluation of historic landscape features of Roeding Park and their recommended treatment. The website link provided in the comment (i.e., <http://www.trees.org.uk/aa/news/National-Amenity-Aboriculture-Conference-Programme-Launched-9.html>) is not accessible. However, the website link references the Arboricultural Association, which is an United Kingdom (UK)-based organization. The standards identified by the United Kingdom-based organization were not followed because these

standards were developed for improving the landscape tree cover for Britain. The tree replacement ratios established by the U.S. Secretary of the Interior for the Treatment of Cultural Landscapes such as Roeding Regional Park which is a potential historic resource would be more applicable.

*Response to Comment O-5*

This comment asks for clarification of whether there are areas of the park that are less historically significant or less sensitive which would serve as a more favorable relocation site for the ponds. Based on a review of the historic features illustrated in Appendix B-1 of the Draft EIR, there are no contributing or non-contributing historical features on the site of the new proposed pond feature. There are other areas within Roeding Regional Park where there are no contributing or non-contributing historical features, and these areas could also be a favorable relocation site for the pond feature. However, given that the proposed site does not have existing historic features, other areas of the park are not considered less historically significant or less sensitive.

*Response to Comment O-6*

This comment recommends that a mitigation measure is developed for the restoration of extant historic-era structures and a dedicated funding stream for the maintenance of these features.

Based on a meeting among the City staff, the City's historic preservation consultant (Page & Turnbull), Fresno Chaffee Zoo, the National Trust for Historic Preservation, and the California Preservation Foundation, the Fresno Chaffee Zoo agreed to the restoration of two of the contributing features: the Pergola and Lisenby Bandstand.

The following is added as an additional mitigation measure for Impact 4.1 on page 4-21 of the Draft EIR; however, the finding of less than significant after mitigation is the same with or without the following mitigation measure.

**4.1(b)**            Prior to the completion of the improvements schedule for 2014 or before, Fresno Chaffee Zoo shall rehabilitate the Pergola and the Lisenby Bandstand according to the Secretary of the Interior's Standards for Rehabilitation. If feasible, the Lisenby Bandstand will be accessible to the public.

In addition to the above revision, the number of Mitigation Measure 4.1 on page 4-21 in Chapter 4 of the Draft EIR is modified to Mitigation Measure 4.1(a).

There is currently no dedicated funding stream for the maintenance of the extant historic-era structures, and no such dedicated funding stream is required to mitigate impacts on historic resources.

*Response to Comment O-7*

This comment questions whether continuous change within the park over time makes the remaining features even more significant.

As described in Attachment B (Supplemental Historical Analysis) of this Response to Comments Document, individual elements within the park are not independently historical. To the extent any elements have historical significance, it is as a contributing feature to the historical district. The continuous changes that have occurred over time throughout the park, include changes to many, if not all, of the contributing features that make up the potential historic district. Very few contributing features remain in the exact state in which they existed when they were first introduced to the park, and many of those that do, such as the memorials or concrete benches, have been moved from time to time, and will be relocated as part of the project. Rather than increase the significance of any of the individual features of the park, the continuous change has weakened the historical integrity of the individual contributing features, because they no longer convey their original historic significance, at least not to the same degree they once did. In some cases, the changes and weakened integrity of the contributing features result in the features' ineligibility for individual listing in the National, California, or Local Register. The features still, however, contribute to the park's eligibility as a historic district. Since further changes to these features, as proposed by the project, will not affect this eligibility, the changes will not have a significant adverse historical impact.

*Response to Comment O-8*

The comment questions the review of future demolition permits by the Historic Preservation Commission. The City is obligated to follow permit review processes as outlined in the Fresno Municipal Code, Article 16, Historic Preservation Ordinance. The Commission will review demolition permits for contributing features of the potential historic district.

*Response to Comment O-9*

This comment requests more information about the alternate areas considered for zoo expansion, specifically those "of less historic significance than the Belmont Avenue landscape and water features."

During the development of the Master Plans that included the expansion of the Fresno Chaffee Zoo by 21 acres, the Fresno City Council and Fresno Chaffee Zoo Corporation reviewed various factors and recognized the need for a balance approach to provide the greatest benefit to the at-large community. The overriding concepts in determining the location of the expansion included sensitivity to the parks place and historic fabric, continuity of spatial organization of the park as a whole, meeting the obligations of Measure Z, application of industry design standards, to the greatest extent possible, maintaining recreational open space, and a pastoral setting for passive leisure opportunities.

As suggested by some commentor's, the Zoo should expand in a northerly direction for the purpose of avoid the removal of the ponds. This possibility was also considered during the development of the Master Plans and on many subsequent occasions throughout the environmental analysis process.

Below are the topics considered and conclusion as to why moving the Zoo in a northerly direction is not feasible.

1. Northern expansion would put the main entrance in the center of the Zoo whereby the Zoo itself would be bifurcated. This would be disruptive to the Zoo's internal circulation system and create two brief Zoo experiences as opposed to one continuum of recreational, visual and educational experience.
2. Northern expansion would create a longer Zoo with less width. This would require exhibits to be arranged in linear fashion, whereby more open space would be required, as opposed to a currently proposed clustering of exhibits. Pedestrian walkways would have to be longer to accommodate the spatial arrangement resulting in a significant loss of open space. Modifications would also have to be made to the exhibit design, restricting possible shapes for exhibits (reducing depth). This would eliminate long, open views, and reducing the depth of the exhibits removes the space for animals to move away from guest space.
3. If the Zoo were expanded to the north, there are several impacts that were also considered:
  - a. Northern expansion would essentially split the park into dis-functioning thirds (Storyland and Playland, Zoo and Public Park). This would significantly impact park spatial organization and the existing continuity among the Fresno Chaffee Zoo, Rotary Storyland, Rotary Playland, and public open space, which constitute the park as a whole.

The design of zoo pathways would be restricted to a more linear flow, possibly even to a single visitor pathway running the length of the zoo. This could create more congestion and challenging vehicle access, as well as impacting the guest experience through reducing the open, naturalistic park-like ambience.
  - b. A linear zoo would divide the park and make it impossible to design sufficient parking in the space west of the zoo (between Rotary Storyland/Playland and the Fresno Chaffee Zoo). This would necessitate additional parking areas east of the zoo, creating very long walks for zoo visitors or requiring a second zoo entrance. A second zoo entrance become very expensive from a capital and operational budget perspective, as is also not desired from a security point of view.
  - c. At a minimum moving the park to the north would impact character defining features of the potential historic district. Specifically, the Maple Grove, Pergola and potentially the Street Car Shelter would all have to be relocated or demolished.
  - d. In essence the trading of these three contributors for removal of the ponds was considered to the unacceptable and unfeasible. There is no net gain.

- e. Northern expansion would essentially eliminate the only children’s play area that has been integrated into open space.
  - f. The proposed parking area would also need to move to the north consuming open space. Conversely, the ponds may provide the pastoral setting, but they do consume space which otherwise could support picnicking and other types of recreational uses.
  - g. Northern expansion would also impact the Tennis Courts which were also determined to be contributors to the proposed district. The City in accepting federal grant funds for the rehabilitation of the courts accepted terms and conditions which require the space be maintains for public recreational uses.
  - h. Northern expansion would disrupt the traffic circulation pattern connecting West Olive Avenue and Golden State Boulevard. This circulation pattern was designed to re-create the 1958 circulation pattern. This pattern was selected to ensure the preservation of past circulations patterns.
4. The park is a dynamic environment and has changed over time. The ponds, like the circulation pattern, has changed. The City recognizes the ponds as an important water feature within the park, which is why the City has gone to great lengths to re-introduce a water feature along Golden State Boulevard.
5. The City Council held a public hearing to determine the role and responsibility of the Fresno Zoo Corporation in Roeding Regional Park. The City Council received a staff report, heard public testimony and independently considered the mater. They determined the lease area for expansion of the Zoo. The Council authorized a lease agreement which specifically provided for a legal description of the property to utilize the Zoo.
6. The City believes that by moving to the north does not satisfy CEQA with respect to considering alternatives.

Based on a review of the land area of 149 Association of Zoos and Aquarium (AZA) zoos, the average size is 66 acres. The Fresno Chaffee Zoo and the City strongly believe a world class zoo can be accomplished with 39 acres (and there are some very good models in the 40 acre plus or minus range), but to reduce that size would severely limit the Fresno Chaffee Zoo and the City’s ability to meet the goal of Measure Z to “bring back large animal exhibits”.

*Response to Comment O-10*

This comment requests clarification about the definitions of “relocation” and “reconstruction” and seeks explanation for the decision to relocate rather than reconstruct the ponds. This comment also includes a question about the ponds remaining as contributing features of the potential historic district after project implementation.

Chapter 4 and Appendices B-1 and B-2 of the Draft EIR does not use the term “reconstruction.” As discussed in Response to Comment F-1, the pond feature is proposed to be relocated. The proposed relocation is to introduce a new pond feature within the park to provide public recreational uses. This introduction of a new pond feature is required to be in accordance with Mitigation Measure 4.8(a) which states that the design of the new pond feature follow historic preservation design guidelines. The introduction of the public recreational use of the pond feature would reduce the potential significant impact on the potential historic district to a level of less than significant. To clarify the intent of Mitigation Measure 4.1(a) (see Response to Comment O-6 for a change in mitigation measure numbering), this measure on page 4-21 of the Draft EIR is revised as shown below. This revision also includes a modification related to restocking the relocated pond feature with fish as described in Response to Comment C-1.

- 4.1(a)**            Maintain the public recreational uses associated with the ponds by introducing a new pond feature in accordance with Mitigation Measure 4.8(a), which states that historic preservation design guidelines shall be developed that address new design in the context of the contributing architectural and landscape features of the potential historic district. A new pond feature shall be located near the Golden State Boulevard entry to the park, such that the pond feature is at least visible and as accessible as they are in their current location. Historic American Landscape Survey (HALS) documentation of the ponds shall be prepared by a qualified historic preservation professional prior to the demolition of the ponds. The Zoo will consult with the California Department of Fish and Game (CDFG) and will stock the pond feature with fish species recommended by CDFG. ~~Vegetation shall be installed around the ponds to recreate the existing character of the ponds, including lawn area for picnicking, and a mature tree canopy.~~

The demolition of the ponds will result in the removal of the ponds from the list of contributing features. The new pond feature will be a non-contributing feature of the potential Roeding Park Historic District that introduces the historic recreational uses associated with the existing ponds.

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November 23, 2010

**VIA EMAIL**

Kevin Fabino, Planning Manager  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, California 93721-3604

Re: Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans Project Draft  
Environmental Impact Report (SCH No.: 2008031002)

Dear Mr. Fabino,

On behalf of the National Trust for Historic Preservation (National Trust), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans Project (Project).

The National Trust for Historic Preservation (National Trust) was chartered by Congress in 1949 as a private non-profit membership organization for the purpose of facilitating public participation in the preservation of our nation's heritage. 16 U.S.C. § 468. With the support of over 190,000 members nationwide, including nearly 20,000 members in California, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The National Trust has nine regional and field offices around the country, including the Western Office in San Francisco which is responsive to preservation issues in the State of California.

The National Trust is concerned about the impacts of the Project on the identified Roeding Regional Park Historic District, which has been recommended eligible for the National Register of Historic Places, the California Register of Historical Resources, and the Fresno Local Register of Historic Resources. The Roeding Regional Park Historic District is a significant example of an early twentieth century municipal park encompassing both picturesque and recreation-centered landscapes and features, and is an important community resource because of its historical and recreation value.

The National Trust commends the City of Fresno for its commitment to substantive mitigation measures for historic resource impacts and for its plans to develop design guidelines for future changes at Roeding Regional Park. However, we find that the analysis

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of project impacts on the Roeding Regional Park Historic District, alternatives analysis, and description of the affected environment presented in the DEIR are incomplete or inadequate on several points. We encourage the City of Fresno conduct additional analysis of impacts to historic resources where inadequacies exist and to adopt Project alternatives or components of alternatives that maximize preservation of the historic district.

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CONT

### Requirements of the California Environmental Quality Act

CEQA reflects the statewide policy that projects with significant environmental impacts, including impacts to the State's historic environment, should not be approved "if there are feasible alternatives ... available which would substantially lessen the significant environmental effects ..." (Pub. Resources Code § 21002.) CEQA thus requires that alternatives be adopted that would "feasibly obtain most of the basic objectives of the project." (Guideline § 15126.6 subd.(a).) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code § 21061.1.) Findings supporting the infeasibility of an alternative must be supported by "substantial evidence" based on an independent analysis by the lead agency. (Pub. Resources Code § 21081.5; Preservation Action Council, *supra*, 141 Cal. App.4<sup>th</sup> 1336.)

P-2

Any project that would demolish an historic resource necessarily has a significant effect on the environment, requiring a lead agency to study and adopt feasible alternatives such as rehabilitation, if available and practical. (Pub. Resources Code § 21081; 21084.1.) CEQA's requirements to identify and analyze feasible project alternatives in an EIR are of great importance when projects threaten historic resources, as is its substantive mandate that demolition not be allowed if there is indeed a feasible alternative.

### Project Impacts to Historic Resources Would be Significant

The DEIR states that the Project would result in the demolition of six contributing features of the Roeding Regional Park Historic District, including four ca. 1907 man-made ponds, the ca. 1907 Umbrella Grove, and the ca. 1946 Palm Point Grove and that the destruction of these resources could materially impair the historic district. The DEIR further states that mitigation consisting of recreating the ponds at a location equally visible and accessible to the public, maintaining public recreation uses associated with the ponds, and planting vegetation to recreate the existing character of the ponds will mitigate the impact to the historic district to a less than significant level.

P-3

According to CEQA, mitigation consisting of rehabilitation or reconstruction of a historic resource in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring,*

*and Reconstructing Historic Buildings* (1995), Weeks and Grimmer, (Standards) shall generally be considered mitigated below a level of significance and thus not significant (Guideline § 15126.4(b)(1)). The DEIR presents no analysis of the conformance of the proposed recreation of the ponds elsewhere within the historic district with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, or with the companion *Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes*.

Recreating a historic feature in a new location in a historic district or cultural landscape, regardless of the care taken to maintain similarity of setting and use, inherently alters the spatial organization and land pattern of the resource, which in turn affects the integrity of the resource and may create additional adverse impacts with the disturbance of other landscape characteristics and features. The *Secretary of the Interior's Standards for the Treatment of Historic Properties* and *Guidelines for the Treatment of Historic Landscapes* clearly advise retention and preservation of historic features and present reconstruction as being appropriate primarily in the original location of the resource or feature. The Standards also stipulate that contemporary additions in a historic landscape not destroy historic materials, features, and spatial relationships that characterize the property and that care should be taken to differentiate contemporary additions from earlier historic fabric.

Based on the information presented in the DEIR, the proposed mitigation measures do not comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, and therefore cannot reduce the impacts to cultural resources to a less than significant level.

#### **Analysis of Project Impacts and Cumulative Impacts on the Roeding Regional Park Historic District is Incomplete**

The DEIR analyzes Project impacts to individual contributing features within the historic district resulting from the expansion of the Fresno Chaffee Zoo, Storyland and Playland and park improvements. However, the DEIR does not analyze the effects of the proposed Project on the eligibility of the Roeding Regional Park Historic District for the California Register of Historical Resources (California Register) or the cumulative impacts of the proposed Project and alterations outside the period of significance (1903-1953) on the integrity of the historic district or its eligibility for the California Register.

Identified alterations and intrusions since the end of the period of significance include State Route 99 (1954); Playland (1955); Storyland (1962); the majority of features at the Fresno Chaffee Zoo (1950s/1960s and later); grove picnic shelters (ca. 1960); and tennis courts (1984). The expansion of the Fresno Chaffee Zoo, Playland, and Storyland and park improvements under the proposed Project would further alter the Roeding Regional Park

P-3  
CONT

P-4

Historic District. When viewed holistically with previous changes, the Project could affect the integrity of the historic district to a degree that it could no longer convey its historic significance. More analysis should be conducted to address the effect of the Project on the integrity of the Roeding Regional Park Historic District as a whole (versus individual contributing features in the district) and the DEIR should include analysis of cumulative effects of Project impacts and other alterations since 1953 on the historic district.

P-4  
CONT

### **Exclusion of Playland as a Contributing Feature in the Roeding Regional Park Historic District is Unsupported**

The HRER for the Roeding Regional Park Historic District identifies a period of significance for the district beginning in 1903 and ending in 1953, citing 1953 as the point at which the development focus in the park shifted away from the picturesque, recreational nature of its early design to encompass more attraction-oriented development. The HRER excludes features constructed after 1953 as contributing resources in the Roeding Regional Park Historic District, arguing that they do not contribute to the significance of the district.

However, the evaluation of significance for the Roeding Regional Park Historic District states that it is significant for exemplifying national trends in the evolution of municipal park development, beginning as an early picturesque pleasure ground and moving toward development of recreation-focused attractions by the mid-twentieth century. If the significance of Roeding Regional Park Historic District is rooted in its reflection of these shifts, key features in the park reflecting both the picturesque and recreational attractions should contribute to the historic district if they retain sufficient integrity.

P-5

The Historic Resource Evaluation Report for Roeding Regional Park notes that Playland, constructed in 1955, "is one of the few extant early amusement parks in California" and that "its construction clearly marks a departure in the character of Roeding Park from a pleasure ground to an amusement facility in the later twentieth century." Based on these facts and the identified significance of Roeding Regional Park, there is a fair argument that Playland should contribute to the Roeding Regional Park Historic District. Additional analysis should be conducted to address this apparent discrepancy and the results incorporated into analysis of environmental impacts in the DEIR.

### **Analysis of Cultural Resource Impacts Under Alternative 3: Limited Zoo Expansion and Renovation is Inadequate**

Analysis of impacts to cultural resources under DEIR Alternative 3: Limited Zoo Expansion and Renovation notes that the alternative would result in the demolition or relocation of existing historic resources and have similar potential impacts to historic resources as the Project. The DEIR presents no information on the specific impacts this alternative would

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November 23, 2010  
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have on the Roeding Regional Park Historic District, though the accompanying Figure 24-2 indicates that the majority of the southeast portion of the park would remain intact, including the four ca. 1907 ponds identified as significant contributing features to the historic district. The statements in the DEIR that "this Alternative would have similar potential historic, cultural, and paleontological resource impacts" and "this alternative would result in the same impacts related to cultural resources [as the Project]" are unsubstantiated.

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CONT

### **Project Alternative Analysis Indicates that an Environmentally Superior Alternatives is Feasible**

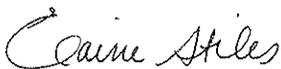
The alternatives analysis in the DEIR states that Alternative 3: Limited Zoo Expansion and Renovation would result in less or similar environmental impacts than the Project and achieve eighteen of the nineteen *Roeding Regional Park Facility Master Plan* objectives, twenty to twenty-seven of the thirty *Fresno Chaffee Zoo Facility Master Plan* objectives; and all of the Rotary Playland and Storyland objectives. This alternative also appears to lessen impacts to the Roeding Regional Park Historic District and potentially maintain its eligibility for the California Register of Historic Places.

P-7

CEQA states that projects with significant environmental impacts, including impacts to the State's historic environment, should not be approved "if there are feasible alternatives ... available which would substantially lessen the significant environmental effects ..." (Pub. Resources Code § 21002.). Alternative 3: Limited Zoo Expansion and Renovation appears feasible and the City of Fresno has provided independently produced analysis of why this less environmentally harmful alternative should not be adopted.

Thank you for the opportunity to comment on the DEIR for the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans Project. Please do not hesitate to contact the Western Office in regard to any questions related to these comments.

Sincerely,



Elaine Stiles  
Program Officer

cc: M. Wayne Donaldson, FAIA; State Historic Preservation Officer  
Karana Hattersley-Drayton, Historic Preservation Projects Manager, City of Fresno  
Janet Gracyk, President, Historic American Landscape Survey, Northern California  
Cindy Heitzman, Executive Director, California Preservation Foundation

**National Trust for Historic Preservation, Western Office, Elaine Stiles - November 23, 2010 (P)**  
*Response to Comment P-1*

This comment states in general terms that the description of the affected environment, impacts, and alternatives analysis presented in the Draft EIR are inadequate, and recommends that the City conduct additional analysis regarding impacts to historical resources. At the urging of this and other commentors, Page & Turnbull conducted additional analysis regarding the historical significance of Roeding Park and individual elements within the park, as well as additional measures that could further protect the significance of integrity of the park's features. This supplemental analysis is provided in Attachment B (Supplemental Historical Analysis) of this Response to Comments Document. This response reflects the fact that the comment does not identify any specific deficiencies or propose any specific modifications to the Draft EIR; specific responses to specific issues raised by the commentor are presented in Response to Comments P-3 through P-7.

*Response to Comment P-2*

This comment outlines the commentor's understanding of the requirements of the California Environmental Quality Act associated with the evaluation of historical resources. No specific comments on the Draft EIR are provided; therefore, no further response is necessary.

*Response to Comment P-3*

This comment questions the adequacy of the mitigation proposed to lessen the impact of the demolition and relocation of the ponds. This comment requests that an analysis be completed to show how the demolition and relocation of the ponds does or does not conform with the Secretary of the Interior's Standards.

As discussed in Attachment B (Supplemental Historical Analysis) of this Response to Comments Document, the proposed relocation is to introduce a new pond feature within the park to provide public recreational uses. This introduction of a new pond feature is required to be in accordance with Mitigation Measure 4.8(a) which states that the design of the new pond feature follow historic preservation design guidelines. The introduction of the public recreational use of the pond feature would reduce the potential significant impact on the potential historic district to a level of less than significant. Please see Response to Comment O-10 regarding a clarification of the intent of Mitigation Measure 4.1(a).

*Response to Comment P-4*

The comment questions the adequacy of the cumulative impacts analysis and requests further analysis to address the effect of the Project on the integrity of the potential Roeding Park Historic District as a whole (versus individual contributing features of the district) and the cumulative effect of project and impacts outside the period of significance on the integrity of the potential historic district and its eligibility for the California Register.

The Draft EIR's analysis of impacts to historic resources, including the HRA, and the Supplemental Historical Analysis (Attachment B) by Page & Turnbull conclude that Roeding Park, as it exists today and taking into consideration changes during and after the period of significance, is eligible for listing in the National and California Registers. Because this evaluation is of the park in its current state, it incorporates changes to the park, such as State Route (SR) 99, Playland, and Storyland. The Draft EIR and supplemental analysis further conclude that the proposed project would not adversely affect this eligibility. Therefore, with the expansion of the Fresno Chaffee Zoo and taking into consideration all of the other changes that have occurred within the park since the end of the period of significance, the cumulative effect would be that Roeding Park would still be eligible for listing as a historic district.

*Response to Comment P-5*

This comment requests that additional analysis be conducted to address Playland as a potential contributing feature of the potential Roeding Park Historic District. An analysis of Playland was completed as part of the Historic Resource Assessment (HRA) in Appendix B-2 in the Draft EIR for Roeding Park, which found Playland to be a non-contributing feature of the potential historic district because "its construction clearly marks a transition in the character of Roeding Park as it evolved from a pleasure ground to an amusement facility in the later twentieth century." This shift in development was towards more amusement-focused uses in the park, including the Zoo as it evolved in the 1950s, as well as Playland and Storyland. As noted in the Draft EIR and Attachment B, it is the landscape features, including the series of open spaces accessible by vehicular and pedestrian circulation systems and small-scale features that contribute to the historic character of the potential District. Therefore, the more amusement-focused uses, such as Playland as well as Storyland, are not considered contributing features to the potential historic district because the themes do not fit within the historic context and significance of the potentially historic district.

*Response to Comment P-6*

This comment asserts that the conclusion that the Limited Zoo Expansion and Renovation alternative would have similar impacts to cultural and historic resources, compared to the proposed project, is unsubstantiated in the Draft EIR. This comment is specifically referring to the last sentence of the Cultural Resources paragraph on page 24-20 of the Draft EIR that states, "Since this Alternative would have similar potential historic, cultural, and paleontological resources impacts, this Alternative could result in potentially significant cultural resources impacts."

Similar to the proposed project, this Alternative would result in the demolition of one contributing architectural feature (i.e., Fresno Chaffee Zoo Administration Office) which was determined to significantly impact the physical characteristics of the potential historic district as well as its eligibility for inclusion in the federal, state, and local registers. Similar to the proposed project, this alternative could include the preservation of this contributing feature through the implementation of Mitigation Measure 4.2, which is to relocate the Administration Office to within the boundaries of the

potential historic district. This Alternative would remove one of the ponds and a small portion of a second pond in the southeastern portion of the site; however, since the recreational use of the pond would remain, less than significant impacts related to the removal of a portion of the ponds would occur. Under the proposed project, all four ponds would be removed; however, the proposed project would introduce a new pond feature at the proposed Golden State Boulevard entrance. The introduction of the public recreational use of the new pond feature within the potential historic district would result in less than significant impacts on the potential historic district as described on pages 4-20 and 4-21 of the Draft EIR. This Alternative would not introduce a physical and visual barrier at the southeastern edge of the potential historic district, unlike the proposed project. In addition, this alternative would need to relocate the movable contributing features such as the concrete benches, monuments, and memorial similar to the proposed project. Finally, similar to the proposed project, this Alternative would include construction activities that could result in impact to significant subsurface cultural and/or paleontological resources. Overall, similar to the proposed project, this Alternative would result in potentially significant cultural resources (i.e., historical, cultural, and paleontological) impacts. The mitigation measures identified in Chapter 4 of the Draft EIR could be implemented to reduce potential significant impacts to historical, cultural, and paleontological resources from the implementation of the proposed project and this Alternative to less than significant.

*Response to Comment P-7*

The comment states that Alternative 3: Limited Zoo Expansion and Renovation appears to fulfill many of the plan objectives, appears to lessen impacts to the potential Roeding Park Historic District, and would be a feasible alternative to the proposed project. As discussed in Chapter 24 of the Draft EIR, Alternative 3: Limited Zoo Expansion and Renovation would result in fewer environmental impacts compared to the proposed project. In addition, page 24-25 of the Draft EIR provides a discussion that the majority of the project objectives could be met. The City of Fresno City Council will deliberate to determine whether to adopt the proposed Master Plans Project or Alternative 3.



November 24, 2010

**Submitted Electronically**

Kevin Fabino, Planning Manager  
 City of Fresno  
 Development and Resources Management Department  
 2600 Fresno Street  
 Fresno, California 93721-3604

5 3<sup>RD</sup> STREET, SUITE 424  
 SAN FRANCISCO, CALIFORNIA  
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[WWW.CALIFORNIAPRESERVATION.ORG](http://WWW.CALIFORNIAPRESERVATION.ORG)

**RE: ROEDING REGIONAL PARK AND FRESNO CHAFFEE ZOO FACILITY  
 MASTER PLANS DRAFT ENVIRONMENTAL IMPACT REPORT  
 (SCH NO.: 2008031002)**

**BOARD OF TRUSTEES**

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Dear Mr. Fabino,

Ray Adamyk, *Pomona*  
 Mike Buhler, Esq., *Los Angeles*  
 Robert Chattel, AIA, *Sherman Oaks*  
 John Fidler, *Los Angeles*  
 Mel Green, SE, *Torrance*  
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 Thomas Neary, *Santa Monica*  
 Julianne Polanco, *San Francisco*  
 Richard Sucre, *San Francisco*  
 Sarah Sykes, *San Carlos*

In October, the City of Fresno released Roeding Regional Park Facility Master Plan and the Fresno Chaffee Zoo Facility Master Plan Draft Environmental Impact Report (DEIR). On behalf of California Preservation Foundation (CPF), I am writing to express our concern over the impacts of the proposed changes to Roeding Regional Park including the proposed Fresno Chaffee Zoo expansion, collectively referred to in the DEIR as the "Master Plans Project."

CPF is the only statewide nonprofit organization dedicated to the preservation of California's diverse cultural and architectural heritage. Established in 1977, CPF works with its extensive network of 1,500 members to provide statewide leadership, advocacy and education to ensure the protection of California's diverse cultural heritage and historic places.

**EXECUTIVE DIRECTOR**  
 Cindy L. Heitzman

Q-1

Roeding Regional Park has been a city and regional destination since its inception in the early 1900s. What began as a passive recreational facility soon grew and expanded with time to include additional paths of travel and active recreational resources including the Zoo, Playland, and Storyland. The Park has been recommended eligible as a historic district for the National Register of Historic Places and the California Register of Historical Resources as a significant example of an early twentieth century municipal park. It is also determined eligible as a district in the Fresno Local Register of Historic Resources for its design and association with George C. Roeding and the Roeding family who made significant contributions to the development of Fresno in the early twentieth century.

While the DEIR recognizes some of the impacts to the eligible district and provides substantive mitigation measures, CPF finds that the cumulative impacts on the district are not fully considered and can not be mitigated to a less than significant level as currently

proposed. We believe that the City should consider an additional alternative or reevaluate the proposed alternatives to meet the Master Plans' objectives as well as maximize the preservation of the contributing resources within the eligible historic district.

Q-1  
(CONT.)

### Cumulative Impacts and Adequate Mitigation

As discussed in the EIR, a historic district is assessed based on the integrity of the sum of its parts, both the built environment and the cultural landscape. Currently, Roeding Regional Park retains integrity of location, design, setting, materials, workmanship, feeling and association. The non-contributing features identified, and clearly depicted in Figure 4-1 of the DEIR, include the main road, the Zoo, Playland, and Storyland which is mostly contained within the southwestern portion of the park. The contributing resources currently cover about two thirds of the park wrapping and incorporated within some of these noncontributing areas of the district.

Q-2

In the Master Plans Project a number of the resources contributing to the district including memorials, ponds, streets, paths, vegetation, picnic groves, and the administration building are currently being proposed for removal which will have an adverse affect on the overall ability of the historic district to convey its significance. As noted, this will affect the district's eligibility for listing in the California Register of Historical Resources. According to CEQA Section 15064.5(b), a "project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment." To help avoid or mitigate the adverse impacts, mitigation measures were recommended in the DEIR.

As part of the mitigation measures, some of the contributing resources are proposed to be relocated or their uses recreated within the district. According to CEQA, mitigation consisting of reconstruction of a historic resource in a manner consistent with the *Secretary of the Interior's Standards* shall generally be considered mitigated below a level of significance and thus not significant. However, in the discussion of the mitigation measures, the *Secretary of Interior's Standards* were only cited for the security fencing not in the relocation of the contributing resources. As such, the level of significance after mitigation can not be "less than significant" as currently stated in the DEIR.

Q-3

Relocating historic feature in a new location in a historic district will potentially have the same affect as the introduction of new non-contributing elements as it alters the setting and original design of the resource. This will affect the integrity of the resource and may create additional adverse impacts. As described in CEQA, substantial adverse change is defined as: "physical **demolition**, destruction, **relocation**, or **alteration** of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired." While individual changes in the district were analyzed for potential impacts to the eligibility of the district, the cumulative impact, including all proposed changes as well as the relocation of historic elements into other areas of the district, was not considered in the DEIR.

Q-4

The removal of the contributing resources due to the proposed expansion of the Zoo, Playland, and Storyland and the introduction of new roads, relocation of historic elements, and other noncontributing elements into the eligible district will substantially alter the district. Only the contributing resources located in the northeastern portion of the park will retain any integrity of location, setting, design, feeling, etc., which is only about one-third of the original park size.

**Alternatives Analysis**

There are only two alternatives, in addition to the standard "No Project" Alternative analyzed for this project. The Limited Expansion Alternative as described and depicted in Figure 24-2, would retain more or the contributing elements than the Proposed Project, however it does not state what historic resources would be demolished or relocated in the analysis. It also states that "this alternative would achieve 18 of 19 of the *Roeding Regional Park Facility Master Plan* objectives but would not achieve three to ten of the 30 objectives of the *Fresno Chaffee Zoo Facility Master Plan* (seven objectives would potentially be possible to achieve but would be more difficult than under the Master Plans Project)." The DEIR does not however provide adequate reasoning as to why the objectives are not being met or what three are not being met by the zoo. For example the objective not being met by the *Roeding Regional Park Facility Master Plan* is because it refers to a "39 acre" acre zoo. What is the reasoning behind the "39 acre" zoo campus and how is the objective not being met by the alternative that includes a "30 acre" zoo campus.

Q-5

CEQA states that "...public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects..."(Pub. Resources Code § 21002). There is not adequate analysis currently provided in the DEIR to state that the Limited Expansion Alternative is not feasible either as prescribed or amended.

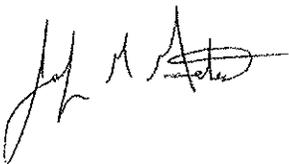
Q-6

CPF recommends that an additional alternative be analyzed. Since, most of the impacts are due to the zoo expansion to the southeast, have other locations for expansion within the park been analyzed? Has a limited zoo expansion been considered to the north into the existing maintenance yard and parking area with the parking being moved north of Storyland?

Q-7

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Master Plans. Please feel free to contact me at (415) 495-0349 if you have any questions.

Sincerely,



Jennifer M. Gates, AICP  
Field Services Director

cc: M. Wayne Donaldson, FAIA; State Historic Preservation Officer  
Karana Hattersley-Drayton, Historic Preservation Projects Manager, City of Fresno  
Janet Gracyk, President, Historic American Landscape Survey, Northern California  
Elaine Stiles, Program Officer, National Trust for Historic Preservation, Western Office

**California Preservation Foundation, Jennifer M. Gates - November 24, 2010 (Q)**

*Response to Comment Q-1*

This comment asserts that the cumulative impacts on the potential historic district are not fully considered and cannot be mitigated to a less than significant level as currently proposed. The commentor believes that the City should consider an additional alternative or re-evaluate the proposed alternatives. The specific comments regarding cumulative impacts, mitigation measures, and alternatives are provided in Comments Q-2 through Q-4. No further response to this comment is required.

*Response to Comment Q-2*

This comment states that the number of resources contributing to the potential historic district that will be removed as part of the proposed Master Plans Project will have an adverse affect on the overall ability of the potential historic district to convey its significance.

The Draft EIR's analysis of impacts to historic resources, including the HRA, and the Supplemental Historical Analysis (Attachment B) by Page & Turnbull conclude that Roeding Park, as it exists today and taking into consideration changes during and after the period of significance, is eligible for listing in the National and California Registers. Because this evaluation is of the park in its current state, it incorporates changes to the park, such as SR-99, Playland, and Storyland. The Draft EIR and supplemental analysis further conclude that the proposed demolition, relocation, and alteration of contributing features of the potential historic district would not adversely affect this eligibility. Therefore, with the implementation of the Master Plans Project and taking into consideration all of the other changes that have occurred within the park since the end of the period of significance, the cumulative effect would be that Roeding Park would still be eligible for listing as a historic district.

*Response to Comment Q-3*

This comment states that the reconstruction of contributing resources need to be consistent with the Secretary of the Interior's Standards. The comment states that the mitigation of only one contributing resource was required to be consistent with these standards and stated that all of the reconstructed and relocated contributing resources need to follows these standards.

The contributing features that will be relocated such as the pond feature, Fresno Chaffee Zoo Administration Office Building, historic concrete benches, George C. Roeding Memorial, George Washington Memorial, Frederick and Marianne Roeding Monument will be relocated within the potential Roeding Park Historic District. When relocating a contributing feature, the intent of the Secretary of the Interior's Standards is to relocate the feature within the boundaries of the potential historic district. Each of these features are proposed to be relocated within the potential district.

Two contributing features are proposed to be rehabilitated even though these features will not be impacted. These contributing features are the Pergola and the Lisenby Bandstand. The Fresno Chaffee Zoo agreed to rehabilitate these two features after discussions with the National Trust for

Historic Preservation and California Preservation Foundation. Please see Response to Comment O-6 regarding the addition of Mitigation Measure 4.1(b), which includes the rehabilitation of these two features.

The contributing features that will be relocated, rehabilitated, altered, or modified as part of the proposed Master Plans Project include the following:

- Relocated: pond feature, Fresno Chaffee Zoo Administration Office Building, historic concrete benches, George C. Roeding Memorial, George Washington Memorial, Frederick and Marianne Roeding Monument,
- Reconstruction/Alteration/Modification: circulation patterns, Zookeeper's House, Pergola, and Lisenby Bandstand.

As discussed in Response to Comment O-10, the pond feature would be relocated and the new pond feature would be designed in accordance with historic preservation guidelines as discussed in Mitigation Measure 4.8(a). The new pond feature will become a non-contributing feature of the potential Roeding Park Historic District. As discussed in Impact 4.8, the intent of the construction of new non-contributing features, is to provide a design in keeping with the Secretary of the Interior's Standards. To clarify the timing for the development of the historic preservation guidelines as well as clarify the intent of the guidelines, Mitigation Measure 4.8(a) on page 4-27 is revised as follows.

**4.8(a)**            Prior to the approval of grading plans to construct new non-contributing features within the potential Roeding Park Historic District, develop historic preservation design guidelines that address new design in the context of the contributing architectural and landscape features of the potential historic district. The historic preservation design guidelines shall be prepared by a qualified historic preservation professional.

The Fresno Chaffee Zoo Administration Office will be relocated within the boundaries of the potential historic district. Therefore, this feature will generally follows the Secretary of the Interior's Standards.

The movable contributing features such as the historic concrete benches, George C. Roeding Monument, George Washington Memorial, and the Frederick and Marianne Roeding Monument will be relocated within the boundaries of the potential historic district. Therefore, this feature will generally follows the Secretary of the Interior's Standards.

Circulation patterns will be altered and Impact 4.5 refers to generally following the Secretary of the Interior's Standards to be compatible with the historic character.

As discussed in Impact 4.9, the non-contributing character-defining elements of the Zookeeper's House, which is contributing feature, will be demolished and alter the feature. Impact 4.9 includes a discussion that the demolition would be carried out according to a maintenance plan based on the Secretary of the Interior's Standards for Rehabilitation.

As discussed above, the Pergola and the Lisenby Bandstand will be rehabilitated as discussed in Mitigation Measure 4.1(b).

*Response to Comment Q-4*

This comment states that relocating historic features in a new location in a historic district or the introduction of new non-contributing elements will affect the integrity of the resource and cause adverse impacts.

As described in Response to Comment O-7, individual elements within the park are not independently historical. To the extent any elements have historical significance, it is as a contributing feature to the potential historical district.

The Draft EIR and Supplemental Historical Analysis (see Attachment B of this Response to Comments Document) conclude that the proposed demolition, relocation, and alteration of contributing features of the potential historic district associated with the proposed Master Plans Project would not adversely affect the eligibility of the potential historic district.

*Response to Comment Q-5*

This comment states that the Draft EIR does not provide adequate reasoning as to why the objectives are not being met by the Limited Expansion Alternative, and specifically ask for the reasoning behind the "39 acre" zoo campus compared to the "30 acre" zoo campus under the Limited Expansion Alternative. Based on a review of the land area of 149 Association of Zoos and Aquarium (AZA) zoos, the average size is 66 acres. The Fresno Chaffee Zoo and the City strongly believe a world class zoo can be accomplished with 39 acres (and there are some very good models in the 40 acre plus or minus range), but to reduce the 39 acre size would severely limit the Fresno Chaffee Zoo and the City's ability to meet the objective of Measure Z to "bring back large animal exhibits".

*Response to Comment Q-6*

This comment also states that there is not adequate analysis currently provided in the Draft EIR to state that the Limited Expansion Alternative is not feasible either as prescribed or amended. Chapter 24 of the Draft EIR includes a comparative evaluation of the Limited Expansion Alternative and the proposed project. This Limited Expansion Alternative was found to have less overall environmental impacts. Some of the objectives may not be met as described above (size of zoo); but the majority of the objectives could be met with the Limited Expansion Alternative.

*Response to Comment Q-7*

This comment requested other locations for expansion within the park be analyzed. As discussed in Response to Comment O-9, various factors were reviewed, and the Fresno Chaffee Zoo and the City recognized the need for a balance approach to provide the greatest benefit to the at-large community. The overriding concepts in determining the location of the expansion included sensitivity to the parks place and historic fabric, continuity of spatial organization of the park as a whole, meeting the obligations of Measure Z, application of industry design standards, to the greatest extent possible, maintaining recreational open space, and a pastoral setting for passive leisure opportunities. Based on this review and detailed in Response to Comment O-9, the expansion of the Zoo in a northerly direction is not feasible.

## 10/25/10 Statement to the Press by George Christian Roeding, III

Ladies and Gentlemen,

My name is George C. Roeding, III and I am a **certified arborist** and the grandson of the George Roeding who not only persuaded his parents to donate the land for **Roeding Park** in 1903 and 1908, but also, in cooperation with landscape architect Johannes Reimers, donated and planted the trees that have provided shade and a unique place of free respite for generations of Fresno citizens for over 100 years. I am here to protect the 811 large and historic trees the City is planning to destroy for the benefit of a greatly expanded zoo and the **parking lots** such an expanded zoo will require in the heart of our beloved park.

Today, Fresno's Historic Preservation Commission is being asked by City of Fresno development staff to comment on the staff's and the zoo's Draft Environmental Impact Report that was released only 2 weeks ago. This voluminous document filling 2280 pages, including Appendices, contains detailed studies that the City and the Zoo have had time to develop over 6 years since the passage of Measure Z in 2004. To expect anyone to be able to intelligently comment on this document after only 2 weeks is ludicrous and this is why I am here before you today.

R-1

Suffice it to say, our own experts, with the support of the Fresno-based **Friends of Roeding Park**, have begun the process of analyzing this Draft EIR and have already found numerous errors and omissions in the Page and Turnbull Historic Resource Assessment and already see the City's utter failure to preserve the very essence and collective integrity of this century old park with their inadequate proposed mitigation measures.

Roeding Park is more than just its history - it is a present day resource for hundreds of thousands who enjoy its picnic areas, open spaces each and every day and whom the City of Fresno has failed to count or consider as it takes the easy road of commercializing the majority of the park. We will present our substantial evidence for opposing this Draft EIR by the end of the prescribed public comment period, and we believe that when we do, there will be new and significant information that will require a complete overhaul and recirculation of this fatally flawed document.

It is my hope that Fresno's appointed Historic Preservation Commissioners will have the good sense to continue their agenda item until after the public and the Friends of Roeding Park have had the chance to submit their comments and that they will reserve their judgment of the adequacy or inadequacy of the City's proposed treatment of Roeding Park until they have all the facts before them. It seems to me that City of Fresno staff is attempting to use the Commission to rubber-stamp this document prematurely. It is my hope that this Commission will make the wise decision today to continue this historic discussion impacting all of Fresno to its future meetings.

R-1  
CONT

Thank you.

***George C. Roeding, III - October 25, 2010 (R)***

*Response to Comment R-1*

This comment expresses concern for historical resources within Roeding Park in regards to construction of the proposed project. This comment also states that additional information would be presented prior to the end of the public review period. No specific comments on the Draft EIR are provided in this comment; therefore, no further response is necessary.

Roeding Park, Fresno, CA

City of Fresno:

I grew up in California and became a LEED accredited, licensed landscape architect largely because of early childhood experiences in Southern California. The polarity of the dearth of green open space in the city of Los Angeles and the abundance of it in neighborhood parks was so powerful that it drove my decision to choose this profession. I was inspired very early on to become someone who could help restore beauty and a sense of place to our cities.

Growing up in and around Los Angeles, I visited our local zoos (Los Angeles and San Diego) perhaps once every few years. Alternately, I spent a great deal of time in neighborhood parks all over the southland, taking frequent day trips to visit a variety of unique attractions around southern California. I can speak personally to the influence of enjoying enormous and interesting trees in these public places that were so easily accessible to my family when I was young. My fondness for those experiences persists today and I would be heart broken if one of those places were to be threatened.

Our historic public parks are an important part of California's heritage and of immeasurable value to today's families and future generations. The loss we suffer as a society when mature trees are removed for new development cannot be repaired with new trees. Taking away open space from the public is a severe blow and expanding the zoo will not heal that wound.

S-1

I would far rather enjoy a smaller, but high quality zoo than one that is larger and would be inclined to visit a smaller zoo more frequently. This may seem strange, but by providing a quality experience gives me the feeling that my paid admission supports something worth while. In addition, I assert that a zoo that exists harmoniously within the fabric of other public spaces will be far more successful than one that stands alone. From my own experience, The San Antonio Zoo in San Antonio, Texas surrounded by Brackenridge Park is one shining example of this. In addition, even the world famous San Diego Zoo benefits from the synergy of being in historic Balboa Park.

Our state has lost enough of its aesthetic and cultural value to development, to the faster pace and higher demands on everything. Locales that have fought to preserve their heritage are far more interesting, attractive, and memorable than those that don't. Our cultural heritage is a priceless and dwindling resource that deserves your protection. Please choose to preserve Roeding Park as a rare and irreplaceable resource.

Thank you for listening.

Jennifer de Graaf, RLA, LEED AP, and vice-chair HALS Northern CA Chapter (Historic American Landscapes Survey).  
2028 Franciscan Way, Alameda, CA 94501  
[Jennifer@deGraafAssoc.com](mailto:Jennifer@deGraafAssoc.com)  
510.521.5594

***Jennifer de Graff - October 28, 2010 (S)***

*Response to Comment S-1*

This comment expresses concern for the loss of mature trees and potential impacts on historical resources within Roeding Park. These impacts of the project are analyzed in Chapters 4 and 5 of the Draft EIR, and in accordance with CEQA, mitigation measures are proposed for potentially significant impacts. The remainder of the comment letter discusses the commentor's opinions regarding public parks and zoos, and the merits of the project, but does not raise any other significant environmental issues. Accordingly, no further response is necessary.



**BARRIE D. COATE  
and ASSOCIATES**

Horticultural Consultants  
23535 Summit Road  
Los Gatos, CA 95033  
408/353-1052

November 2, 2010

Janet Gracyk  
LA 5491  
Terra Cognita Design and Consulting  
145 Keller Street  
Petaluma, CA 94952

Dear Janet

Thank you for the warning about the proposed radical changes in the use of the land donated by the Roeding family to the citizens of Fresno.

It would be a tragedy if another memory of old California with its private collections of trees which have grown more majestic with time is sacrificed for modern expedients such as parking lots.

Some of the old Elms in the park may have become hazardous and need removal but that does not justify changes which would change the nature of the park setting.

I certainly agree with you that this plan should be rethought.

Sincerely,

A handwritten signature in cursive script that reads "Barrie D. Coate".

Barrie D. Coate, ISA 586  
ASCA 237

Cc: Kevin Fabino (City of Fresno)

T-1

***Barrie D. Coate and Associates, Barrie D. Coate, - November 2, 2010 (T)***

*Response to Comment T-1*

This comment expresses concern that the proposed project would unnecessarily remove trees and change the nature of the park setting. These impacts of the project are analyzed in Chapter 5 of the Draft EIR, and in accordance with CEQA, mitigation measures are proposed for potentially significant impacts. No other specific comments on the Draft EIR are provided; therefore, no further response is necessary.

David J Driapsa  
Landscape Architect Chartered  
CULTURAL LANDSCAPE RESEARCH PLANNING DESIGN

November 3, 2010

Mr. Kevin Fabino  
Planning Manager  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, CA 93721-3604

**Re: Roeding Park Cultural Landscape**

Dear Kevin:

Preserving Roeding Park from the intrusion of Chaffee Zoo would be heroic. On behalf of the voiceless future generations who would never experience it otherwise without your vision, I ask you to preserve Roeding Park. Thank you.

U-1

With best regards,

David Driapsa, ASLA  
Historical Landscape Architect  
Coordinator of HALS Liaisons  
The American Historic Landscapes Survey  
The American Society of Landscape Architects

Cc: U.S. Department of the Interior  
Historic American Landscapes Survey  
Governor Arnold Schwarzenegger  
State Historic Preservation Officer  
California Attorney General  
California State Parks  
County of Fresno Supervisors  
City of Fresno Mayor and City Council  
City of Fresno Historic Preservation Commission

725 103<sup>rd</sup> Avenue North, Naples, Florida 34108  
Telephone: 239 591-2321  
Email: [djdl@naples.net](mailto:djdl@naples.net)

Florida Registered Landscape Architect Business #26000355

***David Driaspa - November 3, 2010 (U)***

*Response to Comment U-1*

This comment asserts that Roeding Park should be preserved from expansion of the zoo. The comment generally addresses the merits of the project, but does not raise any significant environmental issues. Accordingly, no further response is necessary.

October 22, 2010

Fresno Historic Preservation Commission  
c/o Fresno City Hall, Conference Room A  
2600 Fresno Street  
Fresno, California 93721

RE: Roeding Park Public Hearing

Dear Commissioners,

I have just learned that your commission will hold a public hearing regarding the proposed expansion of Chaffee Zoo in Roeding Park on Monday October 25<sup>th</sup> and wish to request that this hearing not be closed on the 25<sup>th</sup>. My office, PGAdesign, Landscape Architects was asked to prepare documents for the Historic American Landscapes Survey (HALS) for Roeding Park, and I would like to have an opportunity to give testimony to your commission. Regrettably, the very short notice of this hearing precludes my ability to attend.

I had the opportunity to visit Roeding Park in September of this year and completed a HALS survey at that time. It was my pleasure to see and experience your wonderful historic park – and to observe how the people of Fresno enjoy and appreciate this marvelous park. It is truly a special place and an excellent example of a naturalistic style park, which was popularized in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries.

HALS documents have been prepared for Roeding Park and submitted to the National Park Service in Washington DC. Roeding Park has been designated as the 49<sup>th</sup> site in California to be documented through this program. HALS is modeled on the Historic American Building Survey (HABS), which was created in 1933 by President Roosevelt during the depression, as one way of putting architects back to work, and to record our nation's architectural heritage.

I am charmed by Roeding Park – it is such a special place. As members of Fresno's Historic Preservation Commission, I imagine that you share this feeling, and I hope to have the opportunity to comment on the proposed zoo expansion. I apologize that I am unable to attend the October 25<sup>th</sup> hearing.

Sincerely,

Chris Pattillo, Historic Landscape Architect  
President, PGAdesign

Chris      Cathy      Christopher  
Pattillo    Garrett    Kent

444 - 17<sup>th</sup> Street Oakland CA 94612  
Tel 510.465.1284 Fax 510.465.1256

V-1



## United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, N.W.  
Washington, D.C. 20240

IN REPLY REFER TO

2270-681 (HALS)

October 20, 2010

Bruce Roeding  
California Nursery Company  
Niles District, Box 2278  
Fremont, CA 94536.

Dear Mr. Roeding:

This letter is to acknowledge receipt of the excellent and authoritative Roeding Park history produced for the Historic American Landscapes Survey (HALS) by Chris Patillo, Historic Landscape Architect. HALS was established in 2000 to document historically-significant landscape architecture of the United States with measured drawings, written history and large-format photography. HALS is managed within the National Park Service, the quality of its products is overseen by the American Society of Landscape Architects and the archival care and copyright-free distribution of its products is provided by the Library of Congress.

Roeding Park will be the 49<sup>th</sup> historic landscape to be documented in California. It sets a very high standard for quality of work and significance of resource. As you know, California history is entwined with its history. Its existence as a significant naturalistic style municipal park is a direct outgrowth of the historic California nursery industry and the civic pride it engendered in Fresno. This in combination with the association with Johannes Reimers, a notable California landscape architect, makes it an excellent addition to the HALS collection.

I hope this documentation will serve as an excellent academic tool as well as a strong facility management tool to protect this valuable resource and plan for its future preservation.

Should you have any questions, please feel free to call me at 202-354-2116.

Sincerely,

Paul D. Dolinsky, Chief  
Historic American Landscapes Survey

November 10, 2010

Fresno Historic Preservation Commission  
c/o Mr. Kevin Fabino, Planning Manager  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, California 93721-3604

RE: Roeding Park

Dear Commissioners,

The importance of Roeding Park as a historic landscape came to my attention a few years ago when, as chair of the Northern California Chapter of the Historic American Landscapes Survey (HALS), I led our organization in identifying Northern California's historic parks, gardens, arboretums and other cultural landscapes. Roeding Park along with Kearney Boulevard, Kearney Park and the landscape associated with your Old Administration Building are listed as potential landscapes worthy of HALS documentation.

When I was asked to prepare HALS documents for Roeding Park I was pleased to accept the assignment, but upon visiting the park this past September I discovered what a truly exceptional resource you have. Too few cities in America enjoy the benefits offered by a park of this size and quality design. All too often the vacant land around our urban areas is built up and broken into fragments before those who guide city development realize the need to set aside open space for future generations.

Even when towns and cities have the foresight to set aside land – that is not enough. City leaders must continue to resist the ceaseless demands to encroach on these spaces and fill their open areas with more and more buildings, structures and other things their citizens demand, like dog parks, exercise stations, tennis courts, etc.

HALS was created in 2000 by the National Park Service, in part to help people appreciate the value of cultural landscapes and to understand why it is important to retain these unique historic places that contribute to our shared American heritage.

Roeding Park is an exceptional historic park not just because it has maintained integrity despite some losses, for over 100 years, but because it was designed by one of this country's eminent pioneers of landscape architecture, Johannes Reimers.

Chris      Cathy      Christopher  
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The City of Fresno retained Reimers to design their new park in part because of his extensive knowledge of plants that would thrive in Fresno's hot climate. Reimers worked with George Roeding, son of the original land donor, to design and lay out the internal road system, the chain of lakes in the southeast corner of the park, the original picnic areas and structures, and other park features.

Today their vision endures and the residents of Fresno enjoy the benefits. One of the truly unique features of the park is the many groves of trees. Typically, arboretums are filled with single, isolated specimen trees. At Roeding Park by contrast many trees are grouped or massed together, creating a very different effect. Richard Turner, past director of San Francisco's Strybing Arboretum and editor of *Pacific Horticulture* magazine says that "he knows of no other arboretum that does this."

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CONT

Today, large portions of Reimers' original design are present as are other historic landscape features, and these landscape elements form a cohesive whole. By removing or modifying components of the landscape you threaten to damage the whole unless such changes are made with great care and sensitivity. After reviewing the proposed master plan for the expansion of the Chaffee Zoo, I fear that implementation as illustrated will result in devastating harm to the historic park. I do not oppose improving the zoo, but strongly encourage you and your City Council to urge the zoo to remain within their existing footprint within Roeding Park, and to seek an alternate site nearby, of sufficient size, to accommodate large animals and other new exhibits.

Sincerely,



Chris Pattillo, ASLA  
President, PGAdesign<sup>inc</sup>

Enclosures: Historic American Landscapes Survey for Roeding Park, my curriculum vita, and four letters of support for the preservation of Roeding Park

## HISTORIC AMERICAN LANDSCAPES SURVEY

### ROEDING PARK

HALS NO. CA-59

**Location:** 890 West Belmont Avenue, Fresno, California 93728. West of Golden State Boulevard, bounded by Belmont, Olive Avenues and State Route 99, City of Fresno, County of Fresno, California. GIS Coordinates: 36.750839, 119.819892

**Significance:** Roeding Park is significant under National Register criteria A for its association with events that have made a significant contribution to the development of municipal parks in California. Roeding Park exemplifies the naturalistic style of parks that was popularized during the late 19<sup>th</sup> and early 20<sup>th</sup> centuries. Many of the original distinct features remain and retain integrity. It also qualifies under criteria B for its association with George C. Roeding (1868 – 1928) and landscape architect Johannes Reimers (1856 – 1953). Roeding, the son of Frederick and Marianne Roeding, was born in San Francisco, where he attended school. He began his career when he was charged with overseeing the 640-acre Fancher Creek Nursery founded by his father.

Fancher Creek Nurseries was incorporated in 1884 and developed as the Roeding Home Place, advertised at the time as the largest nursery west of the Rockies. According to Roeding's biographer, Henry W. Kruckeberg, "*The Roeding Home Place soon assumed horticultural importance that attracted visitors from all parts of the world, and was destined to become historical as the place where Smyrna fig culture was first introduced in the United States.*"

The Smyrna fig was one of Roeding's earliest passions. It was not commercially successful at first, but through eighteen years of determined efforts Roeding succeeded in establishing the industry, partly by importing a wasp (*Blastophaga grossorum*) from Asia Minor for fertilization, which he described in his 1903 monograph, "The Smyrna Fig at Home and Abroad." These efforts gained Roeding the title "Father of Smyrna Fig Culture."

Roeding also experimented with olives — at one time testing 25 varieties at the Roeding Home Place — which led to the formation of Roeding Fig & Olive Company in 1904. Roeding was a contemporary of Luther Burbank, who was experimenting with propagating, testing and hybridizing fruit varieties in Santa Rosa, California. Roeding was the first to introduce many of Burbank's hybrids that achieved commercial success in the early 1900s, including the Santa Rosa, Formosa and Gaviota plums as well as the Plumcot — a hybrid between an apricot and a plum.

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Roeding not only tested and developed a variety of fruits, he experimented with packing methods that would preserve and protect them for long-distance shipping. This was a key to securing California's position as the leading distributor of fresh fruit to the rest of the United States. He also developed new packaging methods for Japanese persimmons, grapes and figs.

Roeding expanded his operations in 1917 with the purchase of the 463-acre California Nursery Company in Niles. It had been the largest nursery in the western U.S., founded by John Rock — considered “California's foremost plants man” — who introduced many fruits to California's fruit industry. Roeding also formed the Fresno Nursery Company and the Niles Nursery Company, combining them with Fancher Creek Nursery and California Nursery Company in a holding company called the George C. Roeding Company.

From 1904 to 1907, when the original trees were being selected and planted for Roeding Park, George Roeding maintained a professional relationship with the United States Department of Agriculture (USDA). At their request he accepted, planted and evaluated the performance of many tree species introduced to California. A 1910 article in the San Francisco Call reported, *“The United States Department of Agriculture has made arrangements with the secretary of the board of park commissioners to use Roeding Park as an experiment station. All of their importations gathered by agricultural explorers visiting foreign countries, rare trees and shrubs, have been sent for trial, and as a consequence the Fresno park has valuable trees from Africa, Asia and the Pacific Islands, all thriving and doing well.”* This long-term relationship with the USDA led to Roeding's appointment as a member of the Advisory Committee to the USDA, and later to the U.S. Food Administration.

George Roeding played a role in the allied victory during World War I when the War Department commissioned him to supply 5,000 tons of peach pits and apricot shells to make charcoal for gas masks. It had been found that these materials were far more effective than charcoal produced from wood, and he offered his service to the government without charge. When he died, President Herbert Hoover sent this note acknowledging Roeding's contribution during the war: *“It was my good fortune to have the association of Mr. Roeding in public work during and after the Great War. His was an example of willing sacrifice to public service and constant solicitude for the public good.”*

Because of his position in business and his active role in civic affairs, Roeding was appointed Park Commissioner for the City of Fresno from 1905 to 1912. He served as President of the Pacific Coast Association of Nurserymen from 1910 to 1911, when he founded the California Association of Nurserymen along with 14 other charter members. Roeding served as consulting horticulturalist to the Panama-Pacific Exposition at San Francisco, playing a key role in the construction of the Valley Building as well as the exhibit for San Joaquin

County. He was appointed to the Board of Regents for the State University at Berkeley (now the University of California, Berkeley) in 1915. Roeding was elected president of the State Agricultural Society in 1917, and in that capacity oversaw the state fair.

Still another of Roeding's civic roles was as an advocate for "The Garden Beautiful" program in California's state prison system. He donated plants and supported and encouraged prisoners to develop skills as gardeners, offering several men short-term jobs when they were released. They were able to complete their work experience and ultimately re-enter the job market. Roeding was most actively involved with San Quentin Prison in Marin County, expressing these thoughts about the benefits of the program: "*I am firmly of the opinion that a reformatory work of this kind . . . will prove a valuable asset to . . . prisoners . . . society . . . for its humanity in the redemption of damaged lives.*"

#### Johannes Reimers

Born in Norway in 1858, Johannes Reimers settled in California as a young man. He studied at the San Francisco Art Institute and attained fame as an artist. Some of his works are found in the collection at the Oakland Art Museum and the Art Institute of Chicago. He was also a writer, producing an early review of Jack London's *Call of the Wild*; articles about plants, gardens and gardening; and a novel set in Norway, "Unto the Heights of Simplicity." As the landscape architect for the San Joaquin Division of the Santa Fe Railway, he originated the plan to embellish each depot with small parks. It was through his advocacy that parks were constructed at each station from Ashcroft, Arizona, to Richmond, California.

The City of Fresno hired Reimers as a city gardener, in part because of his knowledge — gained while working for Santa Fe — about what species would thrive in hot, dry climates. He went on to complete plans for both Hobart and Roeding Parks. A third park design attributed to Reimers is Mooney Grove Park in Visalia, California, undertaken in 1910. Reimers also designed the garden for the headquarters of the California Nursery Company in Niles, when it was owned by George Roeding. As a contemporary and personal friend of Jack and Charmian London, Reimers advised them about plantings at their Beauty Ranch property in Glen Elen, California.

Johannes Reimers died in San Leandro, California, in 1953. Kurt Culbertson wrote a book about Reimers for the third edition of "Pioneers of American Landscape Design".

In summary, George C. Roeding played a key role in California's nursery industry at a time when great numbers of new plants — both ornamental and food-producing — were being introduced, tested and developed. Along with

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other pioneers in this field, Roeding helped establish not only the Central Valley but California itself as an agricultural mecca. His contributions to the industry were acknowledged by President Herbert Hoover and by numerous appointments to local, state and national positions.

Roeding Park is noteworthy for its extraordinary collection and wide variety of exceptional specimen trees, and as an outstanding example of landscape architect Johannes Reimers' naturalistic design style, popularized during the late 19th and early 20th centuries. For more than one hundred years Roeding Park has provided Fresnoans with a community space for family gatherings and major civic celebrations. An article by Charles Chambers published in 1909 in *The American Florist*, "The Parks of Fresno, Calif," made this claim about Roeding Park: *"This park is considered one of the finest in the state considering its age and in a few years it will be considered one of the beauty spots of our famous state."*

**Description:** Roeding Park is located in the southwest quadrant of the City of Fresno, in California's agriculturally rich Central Valley. This 148-acre designed landscape is both a park and arboretum. The park is generally square in shape. The Chaffee Zoo occupies approximately one third of the acreage in the middle of the southern half of the park. It is separated from the park by a two-lane park road, with parking, and a chain link fence. The remainder of the park retains much of its original character — a park and arboretum designed in a naturalistic style.

The southeast corner of the park includes lily ponds, two large group picnic areas, horseshoe pits and a dog park. The north third of the park includes a tennis complex in the northwest corner, several more group picnic areas, a pergola, a street car shelter, two outdoor dance floors and a memorial to Japanese-Americans at the mid point along the east side of the park.

The southwest corner includes Storyland, Playland and Lake Washington. Storyland is a fairy tale theme park for young children and Playland is an amusement park with rides. These two areas, as well as the zoo, are fenced and require separate entrance fees.

#### Park Entries

There are two entrances into the park: the main entry on the south side, on West Belmont Avenue, and another entry on the north side, from Olive Avenue. Both are marked by curvilinear rough stone walls set back into the park, forming broad, gracious entries. The detailing of these walls is similar, but each has unique "gateway" elements.

The same stone was used to build a wall around the park in the 1960s. The wall is 13 inches wide, with a flat stone cap, and varies in height from 19 to 48 inches. In most places it is topped with a four-foot chain-link fence, and where

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side streets abut the park there are 33-inch-wide openings in the wall to accommodate pedestrian access. On the west side of the park, along Highway 99, there is a six-foot-high concrete block wall, painted blue on the park side.

Circulation

A main drive loops through the park from the West Belmont entry, but is blocked to through traffic just past the entrance to the zoo. It is not apparent why the original looped circulation was changed. The main road is 70<sup>1</sup> to 80 feet wide, one lane in each direction, with a planted median and parallel parking on both sides. Diagonal parking is integrated into the median. Planting in the median includes mown turf or trees — primarily Camphor (*Cinnemomum camphora*) — with shrubs below. As one drives through the park there is a clearly delineated primary circulation route that loses clarity where it merges with surface parking for Playland and the Chaffee Zoo.

There are several secondary roads that branch off from the main drive. These roads are 40 feet wide, sufficient for one lane in each direction and parallel parking on each side. There is no painted center line or marked parking, which conveys the impression of a gracious, generous roadway. All of the park roads are gently curving. Triangular-shaped planting islands — made from the same stone used in the park perimeter wall — are located where roads merge, to help facilitate the flow of traffic. These are planted with a variety of trees and shrubs.

There are few pedestrian circulation paths within the park, leaving visitors to walk along the driving lanes or across lawns. Where paths occur they are uncolored, brushed concrete varying in width from four to eight feet. Outside the park there are sidewalks along Olive Avenue and Belmont Avenue. Park paths connect to the sidewalks at the two main park entries.

An eight-foot-wide pedestrian path, with par course equipment, is located around the Umbrella Grove, Dog Park and the horseshoe pits, north of the lily ponds. There are also paths around the tennis courts and leading to the zoo from the parking area. Narrow paths provide access to each of the restroom buildings.

Vegetation

Roeding Park is both a park and an arboretum. More than half of the acreage consists almost exclusively of broad expanses of turf planted with trees laid out in informal groupings that loosely define large open areas of lawn. There is a tremendous variety of mature tree species throughout the park. Sometimes a single, isolated specimen is placed to mark a view or fill a lawn area, but more frequently trees are grouped. These groupings vary in numbers. For example, they might consist of five Cork oaks (*Quercus suber*) with overlapping canopies, or a group of 30 towering fan palms — a mix of Mexican and California

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<sup>1</sup> For this study measurements are approximate unless a specific dimension with feet and inches is noted.

(*Washingtonia robusta* and *W. filifera*).

In addition to the species listed above there are outstanding examples of many trees, including Blue atlas cedars (*Cedrus atlantica* 'Glauca'), catalpa (*Catalpa speciosa*), Canary island pine (*Pinus canariensis*), date palms (*Phoenix canariensis*), deodar cedars (*Cedrus deodar*), maidenhair tree (*Ginkgo biloba*), pepper tree (*Schinus molle*), silkoak (*Grevillea robusta*), and many varieties of eucalyptus. There are many species of palms throughout the park, including a few exceptional sago palms (*Cycas revoluta*).

Over one hundred species of trees are thriving in the park. Most are mature specimens in good condition, and some new trees have been added throughout the park. Several tree surveys have been done for the park, at different periods of time, providing good, detailed records of what species have been planted.

Shrubs are used sparingly in much of the park, and, where shrubs do occur, beds are typically defined by flush six-inch-wide concrete curbs to facilitate mowing of the adjacent lawn. Many of these shrubs — including oleander (*Nerium oleander*) and tobira (*Pittosporum tobira*) — have attained substantial size, with stout or multi-trunks.

The character of the planting within the Chaffee Zoo and Storyland is quite different from the park/arboretum. In these areas the planting is much more dense. Vegetation is used, particularly in the zoo, to separate and screen exhibits. There are expansive views, looking between tree trunks, in the arboretum portion of the park. Views into the zoo, however, are screened by dense shrub plantings. By design, portions of the zoo feel like a dense jungle, and in places one walks through tunnels of vegetation.

There are more small-scale and decorative planting beds in Storyland than elsewhere in the park. In Playland, planting is limited to mature trees and a few contained shrub beds; most of the area within Playland is pavement around the amusement rides.

### Topography

The topography throughout the park was artfully and subtly contoured by landscape architect Johannes Reimers. While land surrounding the park is relatively flat, Reimers used grading to elevate or lower areas within the park to create specific effects and control the experience of the visitor. Major excavations were implemented to create a series of ponds in the southeast section of the park, and to build Lake Washington in the southwest corner.

The Eucalyptus Grove multi-family picnic area sits in a broad depression, while the Pine Grove picnic area rests on a gentle knoll. The tennis courts in the northwest corner are set low, which helps to downplay the lines of chain link

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fencing and associated equipment when viewed from other areas of the park.

Buildings

There are prefabricated entry kiosks at each of the two main entries. A residential-scale building just inside the Belmont Avenue entrance serves as the zoo office. (It was previously the park office.) The building has wood siding and a shake roof. A new concrete path leads to the front door, and the rear of the building is fenced.

Identical restroom structures, built according to a simple design in concrete blocks, are evenly distributed throughout the park. There are two small utility buildings (approximately 18' x 12') with attached fenced equipment yards.

Buildings within the zoo include the entry building, the Safari Trading Company Gift Shop, a small rustic cabin building with a stone fireplace that now serves as the Zookeeper's office, the Reptile House, the Elephant Barn facility, the Safari Café and a Veterinary Hospital. In the northeast corner of the zoo there is a complex of newer buildings used for education, a laboratory and marketing and development offices.

Within Playland there is a concessions-ticket booth at the entry. Storyland has many buildings — all miniatures modeled on fairy tales.

Structures

**Picnic Shelters:** There are three picnic shelter structures for group use. Their rustic character is similar to the style of structures built by the Works Progress Administration (WPA) crews during the depression. Each has stout, stone columns with trapezoidal shapes. The two larger of these structures are approximately 72' x 32' with four stone columns on each side. Originally they had shake roofs that have now been replaced with brown aluminum roofing.

The picnic structures sit on concrete slabs, and each has seven 20-foot-long concrete picnic tables shaded by the roof structure. The Palm Point picnic area accommodates about 150 picnickers. A second similarly-sized picnic structure is in the Pine Grove picnic area. This site includes a graded apron that extends the useable picnic area on the east side of the structure. The third covered, somewhat smaller picnic area was constructed in the same style, and was built as a street car shelter.

The park also includes dozens of additional picnic areas without shelters that are shaded by the canopies of mature trees. Several picnic areas are laid out to accommodate large groups — others would be suitable for medium to small groups — and there are single, isolated picnic tables for couples or individual families. The Cedar Grove picnic area occupies an area approximately 85' x 75'. Facilities include thirty-five picnic tables, three double barbeques, two work

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tables, one trash enclosure, three trash cans, and three lights for evening use. Facilities at the Umbrella Grove picnic area are similar.

**Music Stand:** The Lisenby Music Stand was inaccessible at the time of this study. It is enclosed within a tall chain-link fence laced with bamboo fabric and engulfed by the Winged Wonders Bird Show exhibit. Historic photos and what I could see of the roof of this building suggest that it is a grand edifice. There is a large outdoor amphitheater associated with the music stand. The soil to build the massive semi-circular mound for the amphitheater came from the excavation of Lake Washington in the southwest corner of the park. The mound is steeply sloped on the back side – offering a tempting landform for children to run up and down, and has a gently-sloped, bowl-shape facing the music stand, with bleacher seating capable to accommodating large numbers of concert attendees.

**Pergola:** A 100-foot-long curving pergola is located at the center of the park, north of the main entry road. This elegant structure leads to the street car shelter. It consists of Tuscan-style masonry columns, two feet in diameter, that taper slightly at the top. Each is set on a 30-inch-square base. The columns are spaced twelve feet apart. The width of the pergola is fifteen feet, six inches.

Double 2x12 wood beams sit on top of the columns, topped by a lattice built from 2x8 wood members that form a grid approximately two feet by four feet. The entire structure is densely covered with wisteria vines that have thick, tangled canes. Sculptural Hollywood junipers (*Juniperus torulosa*) are planted between the columns on the outside of the pergola.

There are three shallow steps leading up and into the pergola walk from the main drive. As you walk through the pergola there is a level area, then a series of five steps, another level area, and another five steps up. The classic styling of this structure is a notable contrast to the rustic character of other park structures.

**Dance Floors:** Two simply designed dance floors include night lighting and elevated stages. One is on the east side, at about the mid point, and the other is near the tennis courts, in the northwest portion. Each dance floor is approximately 120 feet by 80 feet. The stages are 13'6" x 10'6" and 30 inches high, surrounded by a simple galvanized-pipe railing. Each dance floor has six lights on green metal poles about thirty feet high. One of the dance floors has 16 backless wood benches with galvanized pipe legs. These are set in two rows along one side of the dance floor. The benches are placed on a sloping concrete slab nine feet wide. Each bench is 16 feet long and 12 inches high.

**Playgrounds:** Two traditional playgrounds are located in the north half of the park. Each includes metal climbing structures, drinking fountains and seating areas. The newer of the two has a climbing wall and a concrete path surrounding the play structure, suitable for tricycle traffic. A massive, broad-spreading cork

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oak, immediately adjacent to this play area, offers shade to picnic tables.

**Horseshoe Enclosure:** The park has an area set aside for playing horseshoes. It is approximately 60 feet by 75 feet, surrounded by a four-foot chain-link fence with green fabric. Eight horseshoe pits are laid out inside the enclosure, with turf between the pits.

**Tennis Complex:** A large complex in the northwest corner of the park has fourteen tennis courts and one handball court. Amenities include fencing and gates, aluminum bleachers, billboards for scheduling games during tournaments, benches, trash, drinking fountains, nearby parking, and picnic and restroom facilities. All of the courts appear to have been recently renovated and include night lighting.

**Dog Park:** A relatively recent addition to the park is a two-part dog park for small and large dogs that covers an area approximately 150 feet x 210 feet. It is surrounded by a chain-link fence with entry gates and includes accessories such as trash, dog bags, park rules signage, benches and a multi-user drinking fountain. Included within the dog park are mature park trees.

**Playland:** In the southwest corner of the park, Playland is surrounded by a new, six-foot-tall, black ornamental iron fence and gate. Amusement park rides include a range of age-appropriate options, including race cars, caterpillars, flying helicopters, a trampoline, a small roller coaster, two different-sized Ferris wheels, the Willis & Kyle Express miniature train, tilt-a-wheel, and a traditional merry-go-round with music that can be heard throughout this portion of the park. There are a series of square metal shade structures at the entry to Playland, painted red, green, blue or yellow.

Near Playland, and west of the Belmont entry, is a full-size train locomotive donated to the park by the Southern Pacific Company and delivered by military personnel from Fort Ord in 1956. Engine number 1238 was built in 1918.

**Storyland:** A train station for the miniature train links Storyland to Playland, to several pedestrian bridges over a shallow, concrete-lined stream — each with a unique design — and to other structures that are part of this children's fairytale land. Each exhibit is based on a classic fairytale or children's story, including among many others Mother Goose, the Wicked Witch, the Crooked Man, Hansel and Gretel, and Alice in Wonderland. There is a richly detailed pirate ship and a castle with a party room in the tower.

**Zoo:** The Chaffee Zoo includes many structures needed to house and display animals and to provide safe, accessible access for viewing the animals. The character of the structures and buildings in the zoo is notably different from those found in the park/arboretum. Some of the zoo structures incorporate

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dramatic angular, projecting elements and triangularly shaped canopies. Other zoo structures include Japanese-style detailing. There are also adobe-style walls, large timber elements and more. Each exhibit is unique and correlates with the featured animal or country to which it's native.

Maintenance Yard: North of the zoo there is a four-acre city maintenance yard and employee parking lot where equipment, materials and vehicles are stored. There are several small utilitarian buildings and structures in this area.

Monuments and Donor Recognition Features

The park includes several monuments, but not so many that they become intrusive. Most are subtle bronze plaques mounted on boulders or engraved stone. Monuments include the following:

- Near the zoo office, a two-foot-high bronze bust of George C. Roeding holding a fox that is mounted on a three-foot-high triangular pedestal.
- Also located near the zoo office, a granite boulder six feet, six inches high, nine feet wide and four feet deep with a 22"x14" bronze plaque that reads: "Roeding Park a gift of Frederick and Marianne Roeding to the City of Fresno May 2, 1903."
- Inside the zoo on a concrete base, a bronze plaque that reads: "Dedicated to the Children of Fresno and San Joaquin Valley in Memory of the George C. Roeding Family, 1953."
- Near the Umbrella Grove, a granite boulder 22"x31-36"x24" engraved "Presented to the City of Fresno 1980 North Fresno Rotary, President Besley A. Lewis, With Special Thanks to the Park and Recreation Department of Fresno."
- At Lake Washington, a 29-inch-high bronze bust of President George Washington, mounted on a 39"x48" granite pedestal with two 12"x18" engraved bronze plaques that read: "Washington Memorial Grove, A Gift of the Boys and Girls of Fresno, 1930." An engraving in the back states that the monument was made by the Superior Granite Company in Clovis. It is set in a flush concrete band that measures nine by sixteen feet.
- Outside Storyland facing the parking lot, a "United We Stand" tile mosaic that references the 911 terrorist attack on New York's twin Towers.
- At the entry to Playland, a granite memorial to the Challenger Astronauts that is 7'2"x5'3".

The most elaborate monument is dedicated to the Japanese-Americans from the Central Valley who lost their lives during World War II. This monument is currently located on the east edge of the park and consists of two levels of lawn, flanked by shrub beds, and a granite monument that measures 20 feet wide and varies in height from 32 inches to seven feet, two inches. To the left, as one faces the monument, there is a tight group of three very large Italian cypress

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(*Cupressus sempervirens* 'Italica') and to the right are stumps from a matching group. At the monument, along the centerline, stands a mature columnar *Auracaria* tree.

There are several features within Chaffee Zoo that recognize donors. The character of these features is more varied in design and materials, and includes:

- A Japanese-style wood structure with lanterns and donor plaques, on the ramp up to the primate cage.
- A large stone monument shaped like a stylized elephant.
- A free-standing panel collage of terra-cotta carved zoo animals with donor names.
- A granite boulder engraved with Chaffee Zoological Gardens
- A small bronze plaque, mounted on the outside of the Reptile House, identifying it as a memorial to Edward Kane.
- Donor bricks used for paving.
- An etched bronze panel honoring Dr. Paul Chaffee, Zoo Director 1965 - 1990, mounted on several short logs.

#### Water Features

**Lily Ponds:** Just inside the Belmont entrance and to the east is a series of five ponds. Each has low, rounded concrete edging and is laid out in a curvilinear form. Three of the five have islands lushly planted with trees and shrubs. Wooden bridges have simple, galvanized pipe handrails.

Most of the ponds are shaded by canopy trees offering quiet, cool places beneath. Water lilies, including many varieties collected from around the world, originally donated by W.S. Tevis still fill some of the ponds, and children continue to fish here, in keeping with the original intent.

The pond farthest to the east features an ornately decorated cast fountain approximate 36 inches in diameter and 48 inches above the water level. A jet of water shoots up from the fountain 15 fifteen feet. This feature is visible to drivers near the Belmont Circle at the southeast corner of the park.

**Lake Washington:** The other important original water feature is Lake Washington. It has a concrete edge, and like the lily ponds is laid out with a gently curving, naturalistic form. Historically, a Japanese Pagoda and garden existed on the island in Lake Washington. Today, a pirate ship sits shipwrecked on the shore and is part of a boat ride rental from Playland.

When Highway 99 was constructed a portion of Lake Washington was traded for a triangular plot of land north of the Lake. Unfortunately, the take reduced the size of the lake by about half, and the triangular addition has not been well integrated into the park.

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Other Water Features: In addition to the constructed stream running through Storyland there are water features in the zoo as part of the animal exhibits, and in Playland there is a modern water-play area.

Small-Scale Features

Each of the picnic areas has rustic stone barbeques, most have stone trash enclosures, and there are three small stone drinking fountains that all appear to have been constructed at the same time period. Playland has one uniquely designed barbeque that is a round stone-and-concrete structure with three grills and integral concrete counter surfaces. The detailing of these features is similar to work performed by WPA crews.

Distinctively designed wood benches and picnic tables are found throughout the park. These consist of two-inch-thick wood members and galvanized legs that flare out, forming a trapezoidal shape, similar to the columns that support the picnic shelter structures. These appear to date to the historic period of the park, and their condition varies from fair to poor. Newer picnic tables are vinyl-coated steel made by Wabash. Typically, the historic and new tables are set either in a flush curbed area or on a concrete slab, to facilitate mowing of adjacent lawn.

Throughout the park there are custom-designed precast concrete benches with gracefully curving backs and seats. These are five feet, ten inches long, have no arms, and are installed with a concrete pad, to facilitate mowing. Near the lily ponds there are eight cut pieces of granite varying in size from seven to nine feet long, seven to fourteen inches wide and eight to twelve inches high. The character of these features suggests that they are not original to the park.

There is one unique drinking fountain near the dog park. It is made from small, rounded, light-gray cobbles varying in size from two to five inches. The fountain is four feet square, 29 inches high, and has two working spigots.

A modern interpretation of a historic park feature is located inside the park but oriented to be viewed by drivers traveling on Belmont. It is an American flag, 20 feet high by 30 feet long, made of concrete with deep scoring to create stripes, painted red, white and blue. This feature replaced a similar monument that was originally done in multi-colored flowers by the park's chief gardener from 1920 to 1960, Rocco Manuto.

A few additional small-scale features appear to have been added over the lifetime of the park.

Signage

The historic portions of the park are remarkably free of signage, and where it is needed the design, materials and placement is executed in a non-intrusive manner. Signs are typically constructed of wood with carved, painted lettering.

**ROEDING PARK  
HALS NO. CA-59  
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There are signs at each exhibit in Storyland that identify which fairy tale is depicted. These are uniquely designed, playful, small and low. There are many signs in many styles within the zoo, including directional, educational and donor recognition signs.

Lighting

Various styles of lights are found throughout the park, reflecting the adjacent uses. At the Belmont entrance there are ornately detailed fixtures, whereas the picnic grounds and dance floors are lighted by simple fixtures on plain, metal poles about thirty feet tall. In Storyland the lights are ornamental and mounted on twelve-foot poles, in keeping with the child-sized environment. Chaffee Zoo has strings of festive ornamental bulbs as well as “zoo lights” shaped like animals. The lights at the tennis complex have modern, box-shaped luminiers.

History:

On 4 May 1903 Frederick Christian Roeding and his wife Marianne donated 71.76 acres of land to the City of Fresno to build a community park. On 7 April 1908 the Roedings donated an additional 46.64 acres. Sixteen years later, on 2 January 1924, the City of Fresno purchased an additional 40 acres from the Roedings, bringing the total size of the park to 159.78 acres.

In September of 1903 the City of Fresno retained landscape architect Johannes Reimers from Stockton, California, to prepare detailed drawings and specifications for the layout of the park, for the sum of \$300. George Christian Roeding, son of Frederick and Marianne Roeding, worked with Reimers on the park development in his capacity as park commissioner. Roeding also donated most of the trees planted in the park.

Construction of the park began immediately with the planting of trees. Between 1904 and 1906, 55 of the original acres had been planted. By the end of 1906 the remaining portion of the original 40 acres of tree planting was complete. Records note that the original eucalyptus were started from three-foot-tall specimens with quarter-inch-diameter trunk calipers. A bamboo garden was planted in 1905, palms were planted east of the main entry drive between 1905 and 1906, and the Arizona garden as well as the rose garden — which are no longer extant — were planted during the same time period.

Grading of the roads, originally composed of oiled and compacted earth, was underway in 1906. On 19 December 1906 the design for the pergola and wisteria planting was approved. Excavation work to create one of the lakes was underway in November of 1907.

By 1910 Park Commissioner Charles A. Chambers was directing the work. One of his first major projects was to upgrade the road system by applying a hard surface, using clay excavated from the lake construction.

**ROEDING PARK  
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In 1912, as the City of Fresno grew and a trolley system was being built, the decision was made to add a street car station in Roeding Park. That structure is still known as the street car shelter. The trolley line continued beyond the park boundary to the southwest, terminating at Mountain View Cemetery, where Frederick, Marianne, George C and Elizabeth Thorne Roeding are interred. Service on this line continued until 1939.

Sixteen thousand feet of paths had been surfaced by 1914, plans were underway to build a pressurized system for irrigating the park, and Park Superintendent Claybaugh was directing the construction of rustic arbors, tables and benches for the picnic areas. The state Fish and Game department had donated trout to stock the ponds in the park for fishing.

Four tennis courts were added in the 1920s, and Mr. and Mrs. A.V. Lisenby donated funds to build the Music Stand, which continued to offer outdoor concerts until at least 1972.

A zoo component was also added in the 1920s, when residents began donating animals. The City of Placerville gave two bears to the park in 1923. The Fresno Zoological Society formed in 1949, the same year that a campaign was begun to raise funds to buy an elephant. The first zoo director, Eldon M. "Curly" Blocker, was hired away from the San Diego Zoo that same year and lived for a time with his wife Marie and their children in the house that now serves as the zookeeper's office. "Nosey" the elephant made her debut on 11 September 1949, and continued as a beloved attraction until her death at age 47 in 1996.

Over the years the size of the zoo has been expanded to accommodate more exhibits and additional animals. The name of the zoo was changed in 1985 to "The Fresno Zoo" and in 1990 to "Chaffee Zoological Gardens" in honor of long-term director Paul Chaffee, DVM, who served after Curly Blocker's retirement in 1965 through 1990. In 1993, under third zoo director Ralph M. Waterhouse, the Lisenby Music Stand area was incorporated into the zoo and fenced off from the rest of the park.

On 2 April 1927 an event honoring the original donors, Frederick and Marianne Roeding, took place.

In 1930 a Japanese Tea House and gardens were construction on the island in the large lake in the southwest corner of the park. One year later a Japanese Association gave 100 flowering cherry trees, which were planted around the lake. In September of 1939 a local group of Japanese-Americans purchased a large stone lantern from Japan "as symbol of friendship and cooperation." It was installed in the Japanese garden, but the lantern was vandalized and the Tea House was torn down after the bombing of Pearl Harbor. Nisei Liberty Post 5869

**ROEDING PARK  
HALS NO. CA-59  
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donated a new monument in 1950, inscribed “in sacred memory of American soldiers of Japanese ancestry of the Central Valley who gave their lives so that liberty, justice, equality, and the pursuit of happiness might come to all democratic and peace loving people regardless of race, color or national origin.”

In 1932 a portion of the park was carved out for Belmont Circle, 300 feet in diameter, as part of the Belmont subway construction to replace the former Belmont Avenue at-grade railroad crossing at the Southern Pacific Railroad running between Golden State Boulevard and Weber Avenue. This was also the year that Chief Gardener Rocco Manuto first planted the American flag on Belmont, using red, white and blue flowers. More acreage of the park was taken in 1946, when Highway 99 was constructed.

Roeding Park has received large numbers of visitors from the very beginning, as it does to this day. Newspaper articles dating from its earliest years provide evidence that the Park has long been a treasured community resource. It created a sense of pride for residents, and special holiday events at Easter, Mothers Day, Memorial Day and during the Christmas season drew large crowds. Headlines alone tell the story: “Roeding Park is Already Bringing Fame to Fresno as a Beauty Spot” (1910); “Labor Day Picnic is Great Success” (1918); and “Fresno Park Lures Thousands” (1931).

The community also took great pride in its new showplace of trees. A 1935 front-page article in the California County Life section of the Fresno Bee proclaimed “Beautiful Trees Enhance Fame of Fresno.” This pride was evidenced by the tremendous community effort to plant over 600 trees at Lake Washington to commemorate the 200th anniversary of President George Washington’s birth. School children from Fresno raised money for a granite monument and bronze bust of Washington, and students planted 622 trees of 310 species and varieties as part of the celebration. The new grove was dedicated 7 March 1932.

Members of Fresno’s Rotary club raised funds to build Playland amusement park in 1955, and Storyland was added in 1962.

Members of the Roeding family were invited to visit the park in 2004 as part of a celebration marking the 101st anniversary of the original land donation that made Roeding Park a reality. A granite monument with a commemorative plaque was installed near the zoo office.

Sources: Oral interview with Bruce and George C. Roeding, III., grandsons of George C. Roeding, 2 September 2010.

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**HALS NO. CA-59**  
**PAGE 16**

“The Smyrna Fig at Home and Abroad - a Treatise on Practical Fig Culture, together with an Account of the Introduction of the Wild or Capri Fig, and the Establishment of the Fig Wasp (*Blastophagum grossorum*) in America”, by George C. Roeding, published by the author for general circulation, 1903.

“George Christian Roeding ‘The Father of Smyrna Fig Culture in California’ The Story of California’s Leading Nurseryman and Fruit Grower”, by Henry W. Kruckeberg, California Association of Nurserymen, Los Angeles, California, 1930.

“Trees Grow Fast”, Fresno Morning Republican, 12 Oct. 1905.

“Park Commission, Design for Ornamental Entrance to Roeding Park”, Fresno Morning Republican, 19 Dec. 1906, p. 5.

“Roeding Park is Already Bringing Fame to Fresno as a Beauty Spot” by Charles A. Chambers, Fresno Morning Republican, 1 January 1910, no page number.”

“Acres of Sand Converted into Beautiful City Park”, by Charles C. Chambers, San Francisco Call, v. 107, no. 124, 2 Apr 1910.

“Much Work Done at Roeding Park”, The Fresno Morning Republican, 21 December 1913, pg. 2

“Social Center is Planned in Fairmont, Roeding Park to be Opened in Spring as Picnic Resort”, Fresno Morning Republican, 9 Oct. 1914, p. 31.

“Start Roeding Park Improvements Soon”, Fresno Morning Republican, 4 Oct. 1916, p. 14.

“Labor Day Picnic is Great Success”, Fresno Morning Republican, 3 Sep 1918, pg. 3

“Fresno Parks Lure Throngs”, Fresno Morning Republican, 21 Jun 1931.

“First Trees To Be Planted In Washington Memorial Grove at Rites Monday, Fresno Independent, 21 February 1932, pg. 1.

“Fresno Honors Washington as Grove Started”, Fresno Independent, 23 February 1932.

“Beautiful Trees Enhance Fame of Fresno”, California Country Life – The Fresno Bee, 24 March 1935, pg. 1-2.

Stevens & Bean ad in the Fresno Guide that features the Tea Garden in 1934, 13

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Oct. 1969.

“George C. Roeding – The Man and His Trees”, Fresno Past & Present, by Wanda Podgorski Russel, Vol 26, No. 2, Summer, 1984, pg. 1-3.

“Roeding Park – A Community Center” by Wanda Podgorski Russell, pg. 2-7 in unidentified journal from Fresno County Public Library.

“Roeding park Zoo, written and published by Fresno Zoological Society, 1962.

“Parks of California – Roeding Park”, PG&E Progress, dated 16 October 1974 in the Fresno Co. Public Library collection.

“Official Guide Book of the Fresno Zoo”, published by the Zoological Society of Fresno, ca. 1985.

“Old Glory Renewed – American Flag and an Old Tradition Bloom Again in Roeding Park” by Zeke Minaya, Fresno Bee, 3 July 2001.

“Rediscover Roeding Park”, Imagine Fresno, undated, page 50-55.

Ask/Art The Artists BlueBook worldwide edition.

<http://www.askart.com/AskART/artists/biography.aspx?searchtype=BIO&artist=116477>

Supplementary Historic Building Survey of the Ratkovitch Plan Area by John Edward Powell, <http://www.historicfresno.org/surveys/ratko.htm>

E-mail communications between Marlea Graham and Kurt Culbertson regarding Mr. Culbertson’s book on Johannes Reimers, landscape gardener and artist (1856-1953) for the Pioneers of American Landscape Design, vol III., 2008.

“The Parks of Fresno, Calif” an article in *The American Florist* by Charles Chambers, from Google Books, pg. 7, date unknown, provided by Marlea Graham.

“The Gardens of California” by Johannes Reimers, *For California* 4, No. 6, July 1907, provided by Marlea Graham.

Historian: Chris Pattillo, Historic Landscape Architect, PGAdesign, 444 17<sup>th</sup> Street, Oakland, CA, 94612, [pattillo@PGAdesign.com](mailto:pattillo@PGAdesign.com). Date: 24 Sep 2010

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Photo



Caption

The lily pond in the southeast corner of Roeding Park features a curvilinear edge, a ramp into the pond for maintenance, water lilies and a fisherman. In the background are mature shade trees framing one of the open lawn areas. View is northeast. (Chris Pattillo, September 2010)

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Photo



Caption

The Pine Grove picnic area was built in the rustic style, with trapezoidal columns and concrete picnic tables 20 feet long. View is to the north. (Chris Pattillo, September 2010)

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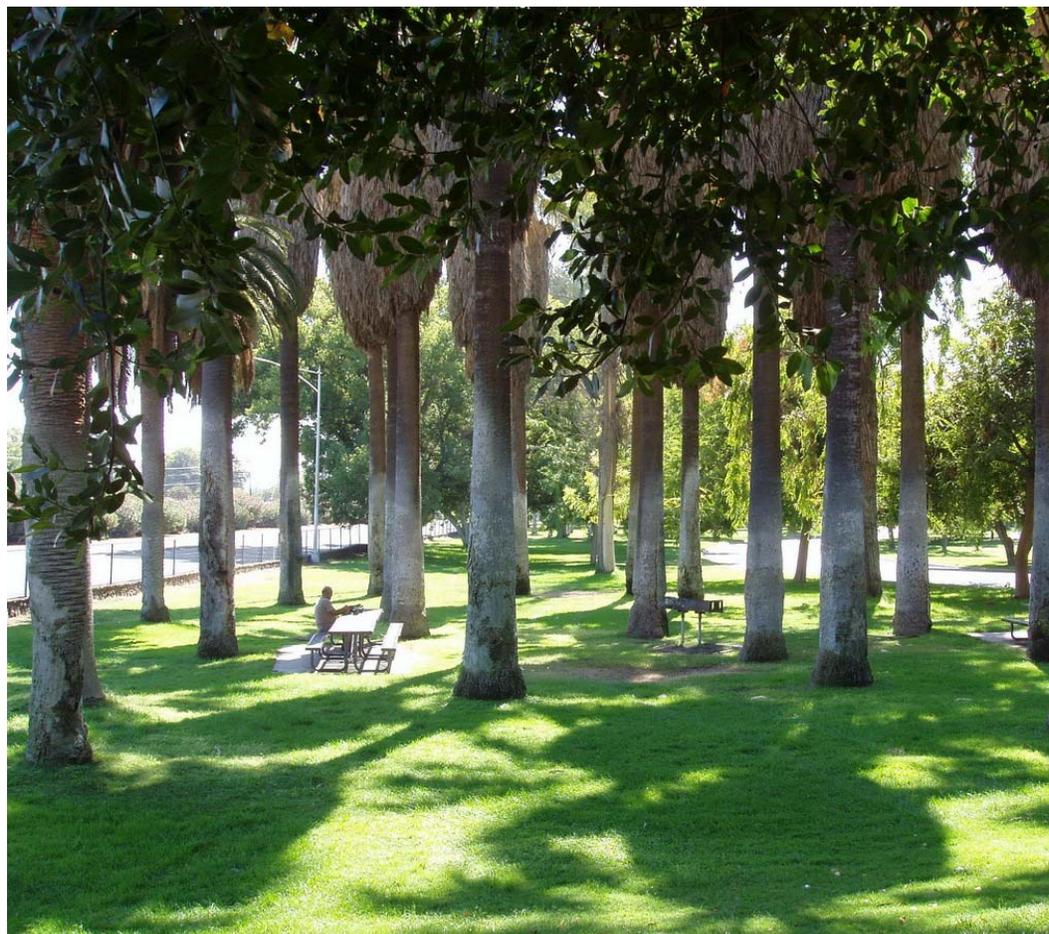
Photo



Caption

According to Sunset Western Garden Book, the Camphor Tree (*Cinnemomum camphora*) grows slowly to 50 feet tall and 60 feet wide, but this colossal specimen north of the zoo entrance is estimated at 85 feet tall with a 95-foot spread. A Maidenhair Tree (*Ginkgo biloba*) is also planted in the median of the main entry drive, at left. View is to the east.

Photo



Caption

A grove of fan palms near the Japanese-American memorial on the east side of the park is one example of the many multi-tree plantings of palms. A single table and barbeque offer a quiet place for a picnic. View is southeast, with Golden State Boulevard on the left. (Chris Pattillo, September 2010)

## CHRIS PATTILLO

**PROFESSIONAL EXPERIENCE**

PGAdesign<sup>inc</sup>, 1979 to present

**EDUCATION - REGISTRATION**

Master of Landscape Architecture, 1975, UC Berkeley  
 Bachelor of Arts, 1972, UC Berkeley  
 California Landscape Architect, #1925

**ASSOCIATIONS – AWARDS**

Historic American Landscapes Survey (HALS), No. California Chapter,  
 Co-Founder 2004, Chair 2004-2009 & Vice Chair 2010  
 American Society of Landscape Architects (ASLA), Member  
 ASLA Hist Preservation Professional Practice Committee, National Chair  
 & Vice Chair 2006-2009  
 California Genealogy Society, Vice President & Boardmember 2010  
 Garden Conservancy, Member  
 California Preservation Foundation, Member  
 California Garden Society  
 National Trust, Member  
 Oakland Heritage Alliance, Member  
 Oakland Chamber of Commerce, Member  
 Oakland Chamber of Comm Economic Develop Advisory Committee  
 Open Space Conserv. & Rec. Elements (OSCAR), Advisory Committee

**AWARDS**

Oakland Chamber of Commerce: "Small Business of the Year" 1995  
 Oakland Chamber of Commerce: "Woman Owned Business of the  
 Year" 2000

**PRESENTATIONS**

*Exploring Cultural Landscapes Through Case Studies*, California  
 Preservation Foundation (CPF), August 2010  
*Historic American Landscapes Survey – An Overview*, American Society  
 of Landscape Architects (ASLA), July 2010  
*Doyle Drive HALS at the Presidio of San Francisco*, CPF, May 2010  
*Landscape Within The Historic Context*, American Institute of Architects  
 (AIA) Historic Resources Committee, San Francisco, CA, June 2009  
*Historic American Landscapes Survey – Tools of Preservation*, UC  
 Berkeley Extension, Landscape Architecture Program, May 2009  
*Alviso Adobe Park: History & Design Process – Opening Remarks*,  
 Pleasanton, CA, October 2008



## **PRESENTATIONS continued**

*Historic American Landscape Survey – A Panel Discussion*, ASLA Annual Conference, San Francisco, CA, October 2007

*Olmsted in the East Bay – tour leader & speaker*, ASLA Annual Conference, San Francisco, CA, October 2007

*Oakland Waterfront Parks – tour speaker*, ASLA Annual Conference, San Francisco, CA, October 2007

*Historic American Landscapes Survey – An Overview*, Oakland Heritage Alliance (OHA), Oakland, CA, Summer 2007

*Historic American Landscapes Survey – An Overview*, Town & Gown Club, Berkeley, CA Spring 2007

*Cleveland Cascade – Rehabilitation of a Howard Gilkey Landscape*, OHA, Oakland, CA, March 2007

*Making a Splash: Preservation of Pools and Fountains*, CPF Conference, Sacramento, CA, April 2006

*Peralta Hacienda Historical Park – Planning and Design*, Friends of Peralta Hacienda, Oakland, CA, December 2005

*Kaiser Roof Garden and The Gardens of the Museum of California: Comparing Two Mid-Century Modern Roof Gardens*, OHA, Oakland, CA, July 2005

*After The Fire and Earthquake*, ASLA Annual Conference, San Jose, CA, October 2002

*Site and Insight*, tour speaker, ASLA, Oakland, CA April 2002

*Irrigation Design (lecture given nine times)*, UC Davis and UC Berkeley, 1986 – 1992

*What The Designer Had in Mind*, Merritt College, Oakland, CA, February 1989

*Irrigation Design for Water Conservation*, Conference on Water Conservation, Sacramento, CA, November 1988

*Planning and Public Policy: The Urban Planning Process*, Department of City & Regional Planning, UC Berkeley, April 1983

## **PUBLICATIONS**

*"Preparing a Historic American Landscapes Survey (HALS) History: Brief Guide to Identifying and Documenting HALS Sites,"* co-author, *National Park Service, US Dept of the Interior, Washington DC, August 2010*

*"Doyle Drive: Using Innovation HALS Methodology,"* SF Heritage News, Vol. XXXVII, No. 2, Summer 2010

*"Innovation HALS Methodology Developed for SF Presidio Project,"* CPF News, Summer 2009

*"Growing Rental Property: Becoming Bay-Friendly in Your Landscaping Can Save Both Water and Cash - featured project,"* Rental Housing Association, August 2010

**PUBLICATIONS continued**

"North Beach Place - featured project," *Award Winning Green Roof Design*, Schiffer Publishing, 2008

"Irvington Terrace - featured project," *Collection: Landscape Architecture*, Braun Publishing, Germany, 2009

**HISTORIC AMERICAN LANDSCAPES SURVEY (HALS)  
NOMINATION FORMS**

Berkeley Women's City Club, Berkeley, 2010

Boyd Memorial Park, San Rafael, 2010

California Nursery Company Historic Park, Niles, 2008

Call Ranch at Fort Ross State Park, Jenner, 2009

Captain Fletcher's Inn & Manager's House, Navarro, 2009

Centerville Pioneer Cemetery, Fremont, 2008

Children's Fairyland, Oakland, 2009

China Camp State Park, San Rafael, 2009

Fern Dale (Shaw House), Ferndale, 2009

Forest Theater, Carmel, 2010

Henry H. Meyers Garden, Union City, 2010

La Mirada Adobe, Monterey, 2010

Marin Art and Garden Center, Ross, 2009

McConaghy Estate, Hayward, 2009

Meek Mansion & Carriage House, Hayward, 2009

Mendocino Woodlands Demonstration Recreation Area,  
Mendocino, 2009

Micke Grove Park, Lodi, 2009

Mountain View Cemetery, Oakland, 2010

Point Arena Cove, Point Arena, 2010

Point Arena Lighthouse, Point Arena, 2010

Point Cabrillo Lighthouse, Casper, 2009

Rancho Higuera Adobe Historical Park, 2008

Ravenswood Estate, Livermore, 2009

Robson-Harrington Park, San Anselmo, 2009

Shibata Japanese Garden (Mount Eden Nursery), Hayward,  
2010

Shinn Historical House & Arboretum, Fremont, 2008

Sun House, Ukiah, 2009

Tor House, Carmel, 2010



# United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, N.W.  
Washington, D.C. 20240

IN REPLY REFER TO:

2270-681 (HALS)

October 20, 2010

Bruce Roeding  
California Nursery Company  
Niles District, Box 2278  
Fremont, CA 94536.

Dear Mr. Roeding:

This letter is to acknowledge receipt of the excellent and authoritative Roeding Park history produced for the Historic American Landscapes Survey (HALS) by Chris Patillo, Historic Landscape Architect. HALS was established in 2000 to document historically-significant landscape architecture of the United States with measured drawings, written history and large-format photography. HALS is managed within the National Park Service, the quality of its products is overseen by the American Society of Landscape Architects and the archival care and copyright-free distribution of its products is provided by the Library of Congress.

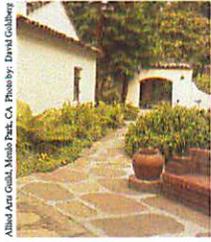
Roeding Park will be the 49<sup>th</sup> historic landscape to be documented in California. It sets a very high standard for quality of work and significance of resource. As you know, California history is entwined with its history. Its existence as a significant naturalistic style municipal park is a direct outgrowth of the historic California nursery industry and the civic pride it engendered in Fresno. This in combination with the association with Johannes Reimers, a notable California landscape architect, makes it an excellent addition to the HALS collection.

I hope this documentation will serve as an excellent academic tool as well as a strong facility management tool to protect this valuable resource and plan for its future preservation.

Should you have any questions, please feel free to call me at 202-354-2116.

Sincerely,

Paul D. Dolinsky, Chief  
Historic American Landscapes Survey



### HALS

Historic American Landscape Survey  
Northern California Chapter  
444 17th Street, Oakland, CA 94612  
Telephone: 510/465-1284

Mr. Kevin Fabino, Planning Manager  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, California 93721-3604

November 9, 2010

Dear Mr. Fabio,

The members of the Northern California chapter of the Historic American Landscapes Survey (HALS) have learned of the proposed expansion of the Chaffee Zoo in Roeding Park, and we are concerned that the proposed changes will negatively impact the park.

HALS is a national program created in 2000 to document our nation’s cultural resources, and to raise public awareness of, and appreciation for these national treasures. Our group identified Roeding Park as a historic resource several years ago, and we understand that the park has now been designated as California’s 59<sup>th</sup> HALS site – congratulations for receiving this recognition.

The residents of Fresno, and of our state, are fortunate that the city had the foresight to accept the donation of land from the Roeding family, and to have invested the effort to develop a wonderful park, that for over 100 years has provided residents a place to enjoy the open space, extraordinary collection of heritage trees, picnicking, tennis, fishing and other recreation activities.

We maintain that the greatest value of this park lies in its existing open expanses of lawn and trees. Currently the zoo and its associated parking are settled into a portion the park, which works reasonably well. The proposal would alter this relationship, making the experience of open parkland secondary to other uses. The additions of Playland in 1955, Storyland in 1962, the dog park and the expansion of the tennis courts complex have already removed large portions of land – evidence of the gradual chipping away of open space within this park. These intrusions and loss of open space typically occur over long periods of time such that the gradual transition makes it difficult to fully recognize the cumulative impact of the loss.

Few cities in the country enjoy the benefits offered by such a sizeable park and the amenities they offer. Often park land is seen as available open space - ready to be filled up with buildings and other structures. Parks such as Golden Gate Park in San Francisco, Central Park and Battery Park (both in New York) are important to the experience of a great city. There is significant documentation that well designed and managed parks improve property values, and create community pride.

**Chapter Founders** ■ Betsy Flack ■ Cathy Garrett ■ Chris Pattillo

V-3

Certainly the aging zoo is in need of rejuvenation, but not by the loss of the open space and tree canopy. It is possible to achieve improvements to the zoo without the insensitive intrusion currently proposed. Our organization believes that the entire site requires analysis of the characteristics that make a great park experience. By conducting a careful study of the park with a view to retaining its most valuable attributes, a more sensitive solution can be forged. We believe that the proposed changes as illustrated in the "Illustrative Roeding Park Facility Master Plan" would significantly, negatively, and irrevocably alter the character and feeling of Roeding Park.

In his book "The Last Landscape" William Whyte describes the forces that threaten our country's parks and open spaces. He advocates that, "What is needed is a basic policy statute declaring that parkland serves one of the highest public purposes and should not be taken unless there is no alternative – and that the burden of proving there is no alternative should be on the taker."

We urge you to consider these observations during your deliberations, and we offer the expertise of our professional membership, if we can assist you in any way. Our organization includes qualified landscape architects from throughout California, and other allied professionals.

It is not that Fresno is going too far with this proposal; it is that the city is not going far enough.

Yours truly,



Janet Gracyk  
Chair, HALS, Northern California Chapter

CC:

City of Fresno Historic Preservation Committee  
Secretary Ken Salazar - U.S. Department of the Interior  
Paul Dolinsky - Historic American Landscapes Survey  
Governor Arnold Schwarzenegger  
M. Wayne Donaldson, FAIA - State Historic Preservation Officer  
Jerry Brown - California Attorney General/Governor Elect  
Director Ruth Coleman - California State Parks  
Patty Keating - Office of Grants and Local Services  
County of Fresno  
John Navarrette - County of Fresno CAO  
Supervisor Susan Anderson - County of Fresno  
Supervisor Phil Larson - County of Fresno  
Supervisor Henry R. Perea - County of Fresno  
Supervisor Debbie Poochigian - County of Fresno  
City of Fresno  
Mayor Ashley Swearingin - City of Fresno

Lee Brand - Fresno City Council  
Mike Dages - Fresno City Council  
Henry T. Perea - Fresno City Council  
Cynthia Sterling - Fresno City Council  
Larry Westerlund - Fresno City Council  
Blong Xiong - Fresno City Council  
City of Fresno Historic Preservation Commission

V-3  
(CONT)

**David J Driapsa**  
**Landscape Architect Chartered**  
CULTURAL LANDSCAPE RESEARCH PLANNING DESIGN

November 3, 2010

Mr. Kevin Fabino  
Planning Manager  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, CA 93721-3604

**Re: Roeding Park Cultural Landscape**

Dear Kevin:

Preserving Roeding Park from the intrusion of Chaffee Zoo would be heroic. On behalf of the voiceless future generations who would never experience it otherwise without your vision, I ask you to preserve Roeding Park. Thank you.

V-4

With best regards,

David Driapsa, ASLA  
Historical Landscape Architect  
Coordinator of HALS Liaisons  
The American Historic Landscapes Survey  
The American Society of Landscape Architects

Cc: U.S. Department of the Interior  
Historic American Landscapes Survey  
Governor Arnold Schwarzenegger  
State Historic Preservation Officer  
California Attorney General  
California State Parks  
County of Fresno Supervisors  
City of Fresno Mayor and City Council  
City of Fresno Historic Preservation Commission

725 103<sup>rd</sup> Avenue North, Naples, Florida 34108  
Telephone: 239 591-2321  
Email: [djdl@naples.net](mailto:djdl@naples.net)  
Florida Registered Landscape Architect Business #26000355



**BARRIE D. COATE  
and ASSOCIATES**

Horticultural Consultants  
23535 Summit Road  
Los Gatos, CA 95033  
408/353-1052

November 2, 2010

Janet Gracyk  
LA 5491  
Terra Cognita Design and Consulting  
145 Keller Street  
Petaluma, CA 94952

Dear Janet

Thank you for the warning about the proposed radical changes in the use of the land donated by the Roeding family to the citizens of Fresno.

It would be a tragedy if another memory of old California with its private collections of trees which have grown more majestic with time is sacrificed for modern expedients such as parking lots.

Some of the old Elms in the park may have become hazardous and need removal but that does not justify changes which would change the nature of the park setting.

I certainly agree with you that this plan should be rethought.

Sincerely,

Barrie D. Coate, ISA 586  
ASCA 237

Cc: Kevin Fabino (City of Fresno)

V-5

RE: Roeding Park, Fresno, CA

City of Fresno:

I grew up in California and became a LEED accredited, licensed landscape architect largely because of early childhood experiences in Southern California. The polarity of the dearth of green open space in the city of Los Angeles and the abundance of it in neighborhood parks was so powerful that it drove my decision to choose this profession. I was inspired very early on to become someone who could help restore beauty and a sense of place to our cities.

Growing up in and around Los Angeles, I visited our local zoos (Los Angeles and San Diego) perhaps once every few years. Alternately, I spent a great deal of time in neighborhood parks all over the southland, taking frequent day trips to visit a variety of unique attractions around southern California. I can speak personally to the influence of enjoying enormous and interesting trees in these public places that were so easily accessible to my family when I was young. My fondness for those experiences persists today and I would be heart broken if one of those places were to be threatened.

Our historic public parks are an important part of California's heritage and of immeasurable value to today's families and future generations. The loss we suffer as a society when mature trees are removed for new development cannot be repaired with new trees. Taking away open space from the public is a severe blow and expanding the zoo will not heal that wound.

I would far rather enjoy a smaller, but high quality zoo than one that is larger and would be inclined to visit a smaller zoo more frequently. This may seem strange, but by providing a quality experience gives me the feeling that my paid admission supports something worth while. In addition, I assert that a zoo that exists harmoniously within the fabric of other public spaces will be far more successful than one that stands alone. From my own experience, The San Antonio Zoo in San Antonio, Texas surrounded by Brackenridge Park is one shining example of this. In addition, even the world famous San Diego Zoo benefits from the synergy of being in historic Balboa Park.

Our state has lost enough of its aesthetic and cultural value to development, to the faster pace and higher demands on everything. Locales that have fought to preserve their heritage are far more interesting, attractive, and memorable than those that don't. Our cultural heritage is a priceless and dwindling resource that deserves your protection. Please choose to preserve Roeding Park as a rare and irreplaceable resource.

Thank you for listening.

Jennifer de Graaf, RLA, LEED AP

V-6

**M E M O R A N D U M**

Date: November 12, 2010  
From: Chris Pattillo  
Project: **Roeding Park**  
Re: Historic Preservation Commission Hearing

Commissioners,

My name is Chris Pattillo. I am the founding partner of PGAdesign Landscape Architects. I have been a licensed landscape architect for over 30 years. I am also one of 3 founders of the Northern California Chapter of the Historic American Landscapes Survey – HALS for short.

I was asked to assess Roeding Park to determine its worthiness for HALS and to prepare documentation if I found that it qualified. Initially, when I read that the existing 18 acre zoo was proposing to double in size by adding 21 acres, I thought oh, well that's not so bad. It still leaves over 100 acres of the historic park intact. But later, as I read the details of the zoo expansion master plan a picture of how much of Roeding Park will be impacted became clear. I did a sketch of the impacted areas and was stunned. This exhibit shows what I am referring to.

- Gold = existing zoo
- Orange = 20 acre expansion

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- Turquoise = entry road, parking, plaza hub, and plan area plus the relocated dog park, maintenance yard, and open lawn, and the fenced off Lake Washington
- Pink = all the other features that will be enhanced according to the master plan

What this exhibit illustrates is that essentially the entire park will be impacted by the proposal. Roeding Park as you know it to day will be irrevocably transformed.

While I have tremendous respect for the consultants who prepared the Historical Resource Assessment, I do have questions about some of their findings and proposed mitigations. If I were you, I would seriously question the claim that building two new, peanut shaped ponds separated by a 70-80' wide new entry road really qualifies as mitigation for the destruction of what is now a peaceful oasis of a chain of lakes with footpaths, simple wood bridges, kids fishing and all shaded by a nearly continuous canopy of 100 year old trees. Mitigation measure 1 claims that with the building these 2 "the impact to the historic district would be avoided".

V-7

I would also question Mitigation 2 that suggests that moving the existing zoo office into the far NW corner of the park and re-commissioning it as part of the relocated maintenance yard would enable it to "retain its status as a contributor to the historic district.

The changes proposed for the W Belmont entrance appear to be dramatic, so that your commission should request a statement of facts upon which the consultant bases their conclusion that these changes are "less than significant and no mitigation is required."

V-8

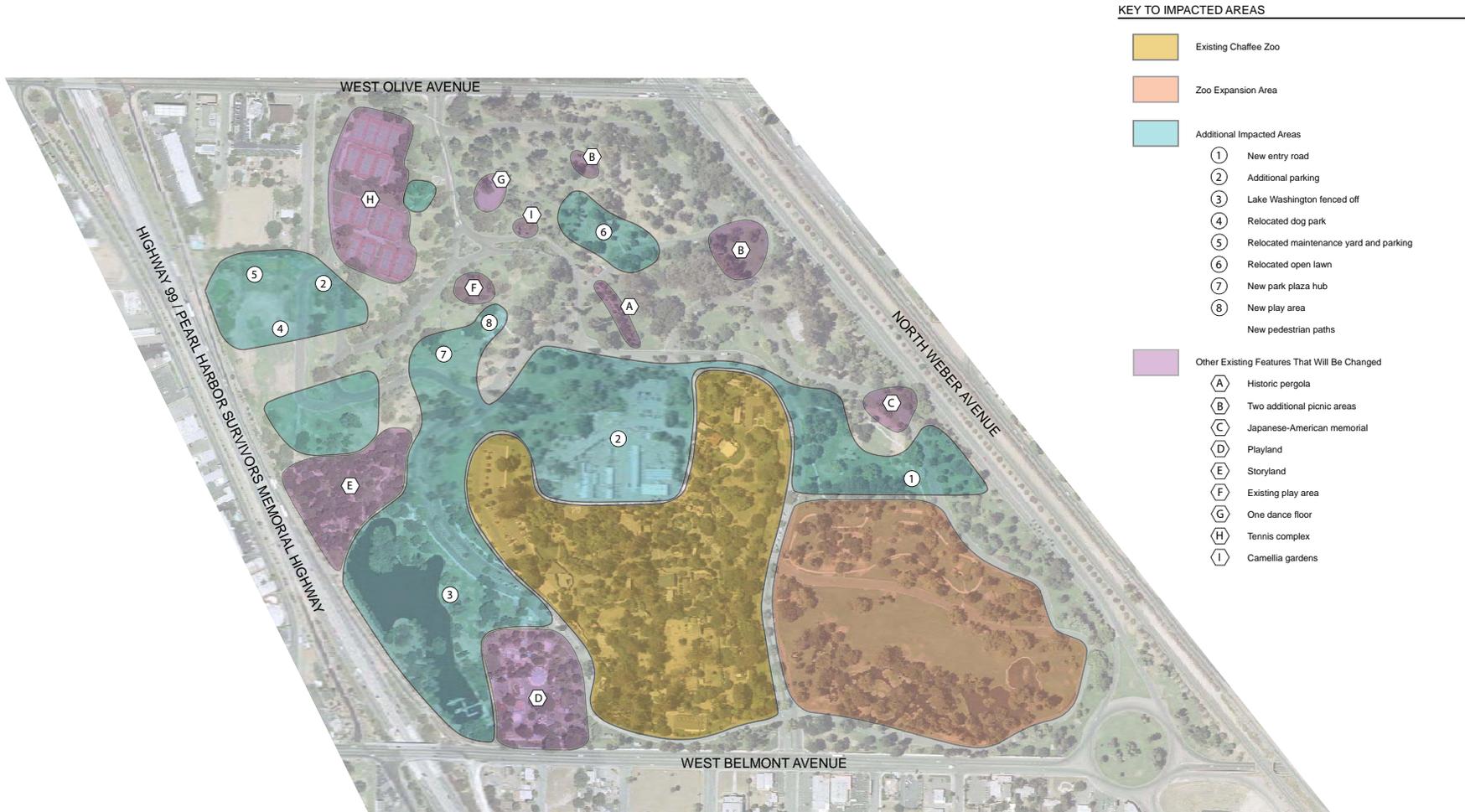
I have other concerns but insufficient time to address each item, so I'd like to close with one general observation.

Roeding Park is more than just a well-loved community park – as a cohesive whole it represents a significant and unique example of our state's and nation's cultural and arboricultural heritage. As members of the historic preservation commission that you understand the weight your opinion carries in this decision. I urge you to question the findings of the consultants and request analysis of the significant impacts to the historic features of the park. You should request avoidance of these impacts by keeping the proposed project within the current footprint of the zoo.

v-9

Thank you for the opportunity to address your commission.

I am available to answer questions.



## ROEDING PARK - AREAS IMPACTED BY PROPOSED ZOO EXPANSION

As Depicted in The Facility Master Plan, June 2009

November 23, 2010

Kevin Fabino  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, California 93721-3604

RE: Roeding Park – Proposed Expansion of Chaffee Zoo

Dear Mr. Fabino,

I was pleased to have the opportunity to meet you and Karana Hattersley-Drayton, and to address the Fresno Historic Preservation Commission at their hearing on November 15th. I was impressed by the comments made by the commissioners who expressed concern about protecting the historic features of Roeding Park and finding ways to protect this important cultural resource. It appears that you and your commission appreciate that Roeding Park is not simply a wonderful, old community park but also a resource with statewide and national significance.

As I testified I am the founding partner of PGAdesign<sup>inc</sup> (PGA) and have practiced as a licensed landscape architect in California for over 30 years. I am also one of three founding members of the Northern California chapter of the Historic American Landscapes Survey (HALS). I was asked to assess Roeding Park to determine its worthiness for HALS and to prepare documentation if I found that it qualified. I previously submitted copies of the results of my assessment to you and have attached a PDF of that document with this letter. I also provided copies of several letters in support of historic Roeding Park. I ask

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that you include this material, in the responses to the draft EIR along with a copy the exhibit my office prepared that illustrates how extensively the park will be impacted if the zoo expansion plan is approved as currently presented.

At the Historic Preservation Commission hearing I was able to raise four points of concern within the time allowed to speakers. A copy of those comments is attached. The remainder of my comments are presented here. These points are organized in two categories: general concerns and specific concerns about the adequacy of the Historical Resources Assessment.

### General Concerns

The Page + Turnbull (P+T) assessment refers to there being 47-age eligible historic features within the park, and that of these only 25 are contributors. Please provide a complete list of all features and an explanation of how they determined which contribute and which do not contribute.

V-10

Provide an explanation for how the period of significance was determined. Playland which is 55 years old certainly qualifies to be included under the *Secretary of Interior Standards for The treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. I believe Playland may also qualify. Our HALS chapter initiated a Theme Park Challenge in 2010 and encouraged historic landscape architects to submit HALS documentation for a theme park in their state. For that challenge the National Park Service stated, "that sites only thirty years old could be considered eligible". Storyland is now 49 years old so a case for it being included in the period of significance should be made in the EIR.

V-11

By adding both Storyland and Playland the number of contributing historic features will increase substantially. These are important historic resources that Fresno residents no doubt share many fond memories of. It is important that

they be afforded the protection garnered by being included in the period of significance, and the impacts to these resources should be addressed in the EIR.

V-11  
CONT

One of my concerns is the proposed change in land use within the park from picnicking and other passive forms of recreation to the display of animals. Historically the zoo component has represented only a relatively small area of the park – 18 of the total 148 acres plus the associated parking. The proposed zoo expansion, and associated expansion of other facilities needed to support the expanded zoo, would change its ratio profoundly. As shown in the attached exhibit at least 60% of the total acreage of the park would be impacted by the zoo expansion.

V-12

The EIR should identify locations where comparable replacement picnic facilities can be provided as mitigation. These picnic areas should include similar amenities, i.e. custom designed, high-quality picnic structures able to accommodate small parties to large groups, and they should be built in locations with existing mature trees that will provide essential shade similar to that found in Roeding Park. The majority of these facilities should be provided within a half-mile radius of Roeding Park. At a minimum a one-to-one replacement should be provided prior to any demolition at Roeding Park.

V-13

Another deficiency in the DEIR is insufficient data on current park users. Surveys should be conducted that provide daily use counts during the week, on Saturdays and Sundays, on holiday and non-holiday weekends during the summer and the warmer months. This survey should show how many visitors come to the park primarily to visit the zoo and how many come to take advantage of other facilities in the park.

V-14

The P+T assessment references a tree survey prepared by Arbor Pro, Inc., yet this survey was not included in the DEIR, that I could find. This is a substantial omission. A list of what trees will be destroyed or transplanted, and their specific

V-15

location within Roeding Park indicated on a map should be included in the EIR. Provide specifications for how the transplanting work will be executed. An independent arborist should then be retained to assess the specifications, and to determine the value of the trees that are proposed for demolition<sup>1</sup>. An arborist who regularly calculates tree values for municipalities informs us that each individual tree would be conservatively valued at between \$30,000 and \$75,000. That means that the project is proposing to destroy between \$24 and \$61 million dollars worth of trees.

V-15  
CONT

The EIR should also include an assessment of the value of lost environmental benefits per AB 32 on global climate change. This assessment should quantify the dollar value of annual environmental benefits that will be lost as a result of the proposed tree removals and should assess the impacts to energy conservation, air quality, CO2 reduction, and storm water treatment requirements.

V-16

Parks need open space. Many seem to hold the view that parks are merely places to be filled up with stuff. In truth, doing so diminishes parks. In my HALS narrative I made a point about the fact that the number and nature of monuments in the park has been handled well – they do not overwhelm the park. This is not always the case. I recently visited a one block park in Carmel that has a monument every few feet and it is too much. If Roeding Park continues to be filled up with stuff, the character of the park will be significantly, negatively impacted. This needs to be addressed in the EIR.

V-17

### Concerns Regarding the Historical Resources Assessment and Proposed Mitigation Measures

In their assessment, Impact 1, paragraph 3, P+T should have acknowledged that the area around the ponds does more than just “create a comfortable setting

v-18

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<sup>1</sup> This valuation should be completed by a registered certified arborist and follow the approved methodology established by the Society of Professional Arborists.  
[http://www.consultingarboristsociety.com/Member\\_listings/Tree\\_Valuation/](http://www.consultingarboristsociety.com/Member_listings/Tree_Valuation/)

for picnicking.” Fishing, relaxing and strolling were omitted. And, the large open area north of the ponds, where informal games are played on weekends, was barely acknowledged. The impacts to these areas needs to be addressed separately and thoroughly. They are important land uses within the park.

V-18  
CONT

In Mitigation Measure 1.0, the last sentence claims that by recreating two new ponds at the new entry, “the impact to the historic district will be avoided.” This is clearly erroneous. Building two new, peanut shaped ponds separated by a 70-80’ wide new entry road is inadequate mitigation for the destruction of what is now a peaceful oasis of a chain of lakes with footpaths, simple wood bridges, kids fishing, all shaded by a nearly continuous canopy of 100 year old trees.

V-19

In Mitigation 2, 4<sup>th</sup> paragraph P+T discusses moving the zoo office into the northwest corner of the park where it will be incorporated into a new maintenance yard and take more park land. This location does not qualify as retaining it as a contributor to the historic district – the maintenance yard is not publicly accessible. By moving the building, it diminishes the integrity of the historic resource. The National Register program gives seven qualities of integrity: location, setting, feeling, association, design, workmanship and materials. Moving the building will mean that the resource has no integrity for location and it is likely that setting, feeling and association will all be diminished significantly.

V-20

Impact 3, 2<sup>nd</sup> paragraph. PGA is concerned about the proposed changes to Roeding Park’s circulation patterns and additions to pedestrian circulation. Historically the park has had very few – almost no - pedestrian walks within the park. Today, ADA codes require us to provide some, but these should be minimized to retain the historic character of the park. This is not addressed adequately in the DEIR.

V-21

Impact 3. The proposal to create a new entry to the park off Golden State and to change the Belmont entrance to pedestrian and delivery only is a huge change, yet the historic assessment deems it to be “less than significant and no mitigation is required.” This is clearly erroneous. There needs to be a more convincing argument to demonstrate that it will not impact the historic district’s ability to convey its significance – though in my professional opinion this is not possible. Additional mitigations are needed to address these impacts.

V-21  
CONT

Impact 4, paragraph 1 - How many benches will be displaced? Where will they be moved? If they are moved, they should remain within the park, not the zoo, and should include the same installation detailing as the original. PGA recommends that the Roeding family be consulted as to where the monuments honoring the family go and be offered the opportunity to review the details of installation.

V-22

Impact 5, paragraph 1 - It is an excellent idea to move the maintenance yard out of the middle of the park, but taking more park land in the northwest corner is not acceptable. The city should purchase additional acreage and move the facility entirely out of the park.

V-23

Impact 5. We need to know the specifics of the impacts to the nine non-contributing features. The Palm Point picnic shelter is listed as one of the nine, but on page one this facility is identified as one of the contributing features that will be demolished. This should be clarified.

V-24

Impact 6. The impacts of the proposed expanded parking, circulation and infrastructure improvements are inadequately addressed in the DEIR. Overall, the Master Plan seeks to fill up the park with highly programmed, object-heavy, for fee uses in place of the ponds and picnic areas which are pastoral, placid, quiet passive uses. These are very significant impacts to the character of the park and need to be thoroughly analyzed and mitigated.

V-25

Impact 6. It is good that the historical assessment acknowledges the importance of the Lisenby music stand and states that it should be protected. More detail needs to be provided. This facility in particular was a gift to the people of Fresno and was meant to be enjoyed by residents at no charge – how will the loss of this use be mitigated?

V-26

Mitigation measure 6 should include a provision that precludes further expansion of the zoo into Roeding Park in the future.

V-27

Impact 7. PGA would argue that it is not possible to mitigate the expansion of the zoo fence into the southwest corner of the park to where it will have a “less than significant impact.” Currently this corner of the park is completely open. In order to draw in paying visitors the zoo must hide the animals within from view, as they do with the existing zoo. Changing the southeast corner of the park from a space with open views beneath the tree canopy to one that completely obstructs views is not something that can be mitigated.

V-28

In part H. Analysis of Cumulative Impacts the assessment makes the point that “Roeding Park has been continually adapted to meet the needs of the current day” and that “this project continues the trend of upgrading Roeding Park and the Fresno Chaffee Zoo to accommodate new recreational uses ....” PGA would argue that the trend at Roeding Park seems to be to fill up the park with money generating venues. What is the limit to this? One could also argue that the zoo has already expanded too much and is already diminishing the historic park.

V-29

The plan to fence Storyland and Playland together as one large fenced (and pay to enter) area would mean that the public would no longer have continuous free access to Lake Washington. This was not addressed in the Historical Resources Assessment and represents another significant omission.

V-30

Conclusion – The Historical Resources Assessment states that the proposed plan “would maintain the majority of the site’s contributing features (including, but not limited to, the vegetation, circulation patterns, buildings, structures, objects, and associated landscape features.)” In contrast, PGA’s assessment of the Master Plan as proposed in the Draft EIR is that well over 50% (perhaps as much as 2/3) of the site’s contributing features are being impacted. What percentage of the park’s trees have already been incorporated into the zoo, Storyland and Playland and how many more will be taken as part of this plan? It appears to us to be well over 50%.

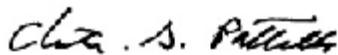
V-31

Additional mitigation measures should include a determination of eligibility for listing on the National Register of Historic Places, and that a qualified landscape architect be retained to complete level 1 HALS documentation for the entire park, prior to any demolition or other changes to historic features of the park outside the current zoo fence.

V-32

PGA thanks the City of Fresno for the opportunity to comment on this Draft EIR and will make our firm available to administrative staff, Historic Preservation Commissioners, Planning Commissioners and City Council Members for any questions or further information.

Sincerely,



Chris Pattillo  
President, PGAdesign<sup>inc</sup>

**PGAdesign Landscape Architects, Chris Pattillo - October 22, 2010; November 10, 2010; November 12, 2010; and November 23, 2010 (V)**

*Response to Comment V-1*

This comment stated that documentation was prepared for the Historic American Landscapes Survey (HALS). However, no specific comments on the Draft EIR are provided; therefore, no further response is necessary.

*Response to Comment V-2*

This comment provides a history of the initial development of Roeding Park and request that the Fresno Chaffee Zoo remain within its existing footprint within Roeding Park. This comment also requests an alternative site nearby, of sufficient size, to accommodate large animals and other new exhibits. Pages 24-2 through 24-4 in Chapter 24 of the Draft EIR provides a discussion of alternative project locations. As discussed in the Draft EIR, relocating the Fresno Chaffee Zoo to an alternative location and not within Roeding Regional Park is not feasible for the following reasons:

- The Measure Z funds that would pay for zoo-related redevelopment and expansion activities can only be used for the Fresno Chaffee Zoo at Roeding Regional Park. Measure Z states: “To help ensure survival of the Chaffee Zoo by providing necessary funding to repair and restore the zoo, bring back large animal exhibits, further revitalize the zoo, and preserve the zoo’s Species Survival Plan and ongoing Education Program, shall Fresno County voters approve a one-tenth of one percent sales tax for ten years with all net proceeds dedicated exclusively to the Chaffee Zoo?”
- A very large investment in buildings, site improvements and infrastructure has already been made at the current location over a period of many years. Abandonment of the facilities at this location for an alternative location would constitute an enormous waste of an existing publicly beneficial investment, and would require substantial additional investment in land, buildings and infrastructure at another location, including permitting processes and environmental review, for which there is no funding. The Measure Z funding that was overwhelmingly approved by the voters would be squandered.
- Development of the zoo at an alternative location would fail to meet the basic project objectives, most of which are based upon the assumption that the zoo would remain at Roeding Regional Park (see Table 24-2 in Chapter 24 of the Draft EIR).
- The Fresno Chaffee Zoo Corporation has an existing lease agreement with the City of Fresno that allows for expansion into the area proposed for zoo expansion.

*Response to Comment V-3*

This comment urges the city to study the park with a view to retaining its most valuable attributes. The commentor asserts that the proposed changes as illustrated in the Roeding Regional Park Master Facilities Plan would significantly, negatively, and irrevocably alter the character and feeling of

Roeding Regional Park. Where feasible, contributing features of the potential historic district are left unaffected by the project, or alterations and relocations are proposed in a manner that will preserve the features' contribution to the potential historic district. The Supplemental Historical Analysis provided in Attachment B of this Response to Comments Document evaluated ten contributing features to the potential historical district and determined that with the demolition, relocation, and alteration of the contributing features as well as the implementation of the proposed mitigation measures, the remaining contributing features and the mitigated contributing features would still contribute to the park's eligibility as a historic district.

*Response to Comment V-4*

This comment asserts that Roeding Park should be preserved from expansion of the zoo. The comment generally addresses the merits of the project, but does not raise any significant environmental issues. Accordingly, no further response is necessary.

*Response to Comment V-5*

This comment expresses concern that the proposed project would unnecessarily remove trees and change the nature of the park setting. These impacts of the project are analyzed in Chapter 5 of the Draft EIR, and in accordance with CEQA, mitigation measures are proposed for potentially significant impacts. No other specific comments on the Draft EIR are provided; therefore, no further response is necessary.

*Response to Comment V-6*

This comment expresses concern for the loss of mature trees and potential impacts on historical resources within Roeding Park. These impacts of the project are analyzed in Chapters 4 and 5 of the Draft EIR, and in accordance with CEQA, mitigation measures are proposed for potentially significant impacts. The remainder of the comment letter discusses the commentor's opinions regarding public parks and zoos, and the merits of the project, but does not raise any other significant environmental issues. Accordingly, no further response is necessary.

*Response to Comment V-7*

This comment questions the adequacy of the mitigation proposed for Impact 1.0 in the Historical Resources Assessment - CEQA Evaluation (see Appendix B-1 in the Draft EIR) related to the demolition of the ponds. Please see Response to Comment P-3 regarding the effect of removing the ponds and eliminating a major historic recreational use within the potential historic district.

This comment also questions the adequacy of the mitigation proposed for Impact 2.0, relocation of the Zoo Administration Building. This comment raises concern over the selection of the Maintenance Yard as the new site for the building, and asserts that this location would not enable it to retain its status as a contributor to the potential historic district.

The Zoo Office serves an administrative function in Roeding Park, and this relationship and use will be maintained as part of the proposed project. The building served as the first office of the zoo superintendent, and after it is moved, the building will serve as an office for the Roeding Park Manager. The movement of the building within the boundaries of the potential historic district will allow for the continued association of the building with the zoo's administrative operations as an office for internal staff, not a public building. To ensure adequate documentation of the Zoo Administration Office is provided, Mitigation Measure 4.2 on page 4-22 of the Draft EIR is revised as follows.

- 4.2** Relocate the Fresno Chaffee Zoo Administration Office within the boundaries of the historic district that is consistent with its historic setting. Consistency with the historic setting shall be determined by a city-approved historian. Historian American Building Survey (HABS) documentation shall be prepared for the Administration Office by a qualified historic preservation professional prior to relocation.

*Response to Comment V-8*

This comment requests additional justification for the changes proposed to the West Belmont entrance and the conclusion that these changes are less than significant and no mitigation is required. The proposed changes to the West Belmont entrance are discussed in Impact 4.5 in Chapter 4 in the Draft EIR. As discussed on page 4-25 in Chapter 4 of the Draft EIR, although the project will alter the entry sequence currently experienced by visitors due to the introduction of a new entry along Golden State Boulevard, the historical layout of the park included an entrance along the eastern edge of Roeding Regional Park as early as the 1920s, and during a portion of the period of historical significance. Therefore, since the entry changes would be compatible with the character of the historic entrance, this change would not adversely impact the ability of the potential historic district to convey its significance nor the district's eligibility for listing in the California Register of Historic Resources.

*Response to Comment V-9*

This comment requests analysis of the significant impacts to the historic features of the park. As described in Attachment B (Supplemental Historical Analysis) of this Response to Comments Document, individual elements within the park are not independently historical. To the extent any elements have historical significance, it is as a contributing feature to the historical district. As discussed in Attachment B, ten contributing features were evaluated for individual historical significance. As discussed, none of the ten contributing features were found to be an individual significant historic resource.

*Response to Comment V-10*

This comment requests a complete list of contributing features of the potential Roeding Park Historic District and an explanation of how contribution was determined.

A complete list of Contributing/Non-Contributing features is included on page 5-7 of the Historical Resources Assessment (HRA) in Appendix B-2 in the Draft EIR. The justification for the contributing/non-contributing determination for each feature, including discussion of integrity of individual features is found in the accompanying DPR 523A forms in the appendix of the HRA. In addition the Supplemental Historical Analysis in Attachment B of this Response to Comments Document provides additional information regarding the contributing features. Contribution was determined based upon whether a feature was associated with the significance themes identified for the district, retained integrity, and was constructed during the period of significance.

*Response to Comment V-11*

This comment requests an explanation for how the period of significance was determined. This comment also asserts that Playland and Storyland should be included as contributors to the potential historic district.

The period of significance justification is described on page 25 of the HRA (Appendix B-2 of the Draft EIR). The end date of the period of significance signifies “when the development focus shifted from the park as a whole to attraction-specific development of the Roeding Park Zoo and other amusement areas within the park.” The shift in development towards more amusement-focused uses in the park, included the Zoo as it evolved in the 1950s, as well as Playland and Storyland. It is not appropriate to include Playland and Storyland in the potential historic district because the themes do not fit within the historic context and significance outlined for the potential historic district.

*Response to Comment V-12*

The comment expresses concern over the proposed change in land use and expansion of the zoo, resulting in the change in land use from park to zoo. As discussed in Impact 3.1 in Chapter 3 of the Draft EIR, the 2025 Fresno General Plan designates the project site as a regional park that provides a wide range of recreational facilities and activities. These forms of recreation and recreational facilities and activities expressly include commercial recreation, such as water parks and amusement parks. The expansion of the zoo will not impact the amount of regional park land available to the public. It will simply adjust the ratio of active to passive recreational opportunities within the existing Regional Park.

*Response to Comment V-13*

This comment requested picnic facilities that are removed should be relocated either within the park or within one-half mile of the park. The proposed project includes picnic groves and play zones in the northeastern portion of the park. The picnic groves will include shade pavilions, tables, chairs, and tot lot equipment. The picnic area will be located within the existing tree groves to provide

shade. This comment requested a one-to-one replacement, however, the active and passive recreational areas of Roeding Regional Park are currently under-utilized during non-peak hours.

*Response to Comment V-14*

This comment states that the Draft EIR is deficient in providing data on current park users. The PARCS Department provided data on the number of people entering Roeding Regional Park by car in 2008. A parking survey of vehicles entering Roeding Regional Park was conducted in December 2008. In addition, traffic counts were performed at the park entrances and exits in August 2007, May 2008, and June 2008. These counts and surveys provided adequate data on current park users. A comparison of the parking survey of vehicles entering Roeding Regional Park and the data on the number of visitors to Fresno Chaffee Zoo, Playland and Storyland was conducted. As discussed on page 3-7 in Chapter 3 of the Draft EIR, of the estimated 600,000 people entering Roeding Regional Park in 2008, 72 percent visited the Fresno Chaffee Zoo and 19 percent visited Rotary Storyland or Playland (or both).

*Response to Comment V-15*

This comment requested to review the tree survey prepared by Arbor Pro, Inc. The tree survey was referenced as a source within various tables in Chapter 5 of the Draft EIR. This survey report has been available to anyone who requested to review it and is still available for review at the City of Fresno Development and Resources Management Department, 2600 Fresno Street, Fresno CA 93721-3604. The reference to the Arbor Pro tree report information was inadvertently left out of the discussion of Sources on page 5-33 of the Draft EIR. Therefore, the following is added as the first source on page 5-33 of the Draft EIR.

Arbor Pro, Inc. No Title. Collection of tables and exhibits that provide information about the existing trees within Roeding Regional Park. 2009.

*Response to Comment V-16*

This comment asks that the dollar value of annual environmental benefits resulting from the loss of trees be quantified. Determining the dollar value of annual environmental benefits from the loss of trees would be speculative and beyond the scope of CEQA. In addition, according to Section 15131 of the CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment.

This comment also asks for an assessment of impacts to energy conservation, air quality, carbon dioxide reduction, and short-term and long-term storm water (treatment) requirements. Chapter 10, Air Quality, provides a discussion of the amount of energy use (i.e., electrical and natural gas) and identifies carbon dioxide reductions within the greenhouse gas evaluation. Chapter 10, Air Quality, also provides a discussion of impacts on air quality. Impacts related to stormwater quality requirements are addressed in Impact 14.1 in Chapter 14 of the Draft EIR.

*Response to Comment V-17*

This comment asserts that “If Roeding Park continues to be filled up with stuff, the character of the park will be significantly, negatively impacted” and needs to be addressed in the Draft EIR. This comment is in specific reference to monuments and similar features. Please see Response to Comment P-4 regarding the expansion of the Fresno Chaffee Zoo and taking into consideration all of the other changes that have occurred within the park since the end of the period of significance. The cumulative effect would be that Roeding Park would still be eligible for listing as a historic district.

*Response to Comment V-18*

This comment states that the Draft EIR did not sufficiently outline all of the uses associated with the ponds, including fishing, relaxing, strolling and playing informal games. This comment requests that these areas be addressed separately and thoroughly.

Page 4-20 of the Draft EIR states that “Overall, the demolition of ponds A, B, C, D will adversely affect the overall ability of the historic district to convey its significance by eliminating a major historic recreational use within the historic district, and will affect the district’s eligibility for listing in the California Register of Historical Resources.” The recreational use associated with the ponds (including fishing, relaxing, strolling and playing informal games) is addressed and the impacts identified.

*Response to Comment V-19*

This comment challenges the conclusion in the Draft EIR that the re-creation of ponds according to the current design will mitigate the impact to the potential historic district. Please see Response to Comment O-10 regarding the introduction of a new pond feature to provide public recreational uses. As clarified in the revised Mitigation Measure 4.1(a) (see Response to Comment O-10), the intent of the mitigation measure is not to re-create or replicate the pond feature, but to design the new pond feature in the context of the contributing architectural and landscape features of the potential historic district.

*Response to Comment V-20*

This comment states that the relocation of the Zoo Office to the Maintenance Yard (as outlined in Mitigation 2.0 in the HRA) will result in the loss of integrity of setting of the historic resource.

Please see Response to Comment V7 regarding the relocation of the Zoo Office. This historic resource is the entire potential historic district, and the proposed change in one feature will not result in the loss of integrity of location, setting, feeling and association.

*Response to Comment V-21*

This comment raises concern about the proposed changes to Roeding Regional Park’s circulation patterns (including entrances) and additions to pedestrian circulation. This comment states that this issue is not adequately addressed in the DEIR.

Based on a review of pages 65 through 68 of the HRA, historical changes have occurred to the circulation pattern within the Roeding Regional Park. The proposed design of the project maintains open space, spatial organization and the circulation pattern to ensure continuity of the entire park setting.

Exhibit 2-5, Illustrative Roeding Park Facility Master Plan, of the Draft EIR shows the conversion of a portion of the existing vehicular circulation pattern to pedestrian and bicycle pathways. These pathways are identify by an adobe color on Exhibit 2-5 showing connectivity from the West Olive Avenue entrance/exit, running along the northern part of the park then parallel with Golden State Boulevard and back westerly to the West Belmont Avenue entrance/exit. This proposed design would create a more walkable leisure setting and experience of the park surroundings.

To enhance accessibility to the park, the project includes a pedestrian gate on Golden State Boulevard, just south of the intersection of Olive Avenue and Golden State Boulevard. This design creates an entry point accessible to the neighborhood to the northeast as well as potential foot traffic. The new gate and pathway connecting to the main circulation pattern is approximately less than 200 feet in length.

Another modification to the circulation system is the elimination of a short road segment that runs east and west generally connecting the Eucalyptus Grove and the Street Car Shelter. This would remove approximately 56,000 square foot of surfacing for the purpose of creating additional open space. Moreover, the removal of this roadway provides greater continuity, enhances spatial organization of the park, and enhances accessibility to open space.

Due to historical changes that have occurred to the circulation pattern within Roeding Regional Park and the proposed accessibility changes that are proposed, these modification to the existing circulation system are considered to have a less than significant impact to the integrity of the potential historic district setting.

*Response to Comment V-22*

The comment requests clarification about the number of benches that will be displaced, moved, etc. The comment also recommends that the Roeding family be consulted about the placement/relocation of monuments in the park. As identified in Impact 4 of the HRA CEQA Evaluation (Appendix B-1 in the Draft EIR) as well as the Supplemental Historic Analysis (Attachment B of this Response to Comments Document), the historic concrete benches that are randomly located near the ponds and the park boundary will be relocated. At this time, concrete benches will be relocated within the potential historic district; however, the specific locations have not been determined. Because these concrete benches will be relocated within the potential historic district, the relocation of these features would generally follow the intent of the “Secretary of the Interior’s Standards.”

*Response to Comment V-23*

This comment supports the removal of the maintenance yard from the middle of the park, but does not support the placement of the maintenance yard in the northwest corner of the park. No specific comments on the Draft EIR are provided; therefore, no further response is necessary.

*Response to Comment V-24*

The comment requests additional information about the impacts to non-contributing features, especially the Palm Point Picnic Shelter, which the commentor incorrectly identifies as a contributing feature.

As outlined in Chapter 4 of the Draft EIR, “Non-contributing features do not contribute to the historic significance of the historic district...and demolition or alteration of non-contributing features does not have a significant impact on the historic district.” The Palm Point Picnic Shelter is a non-contributing element that was added in circa 1960 and does not contribute to the significance of the potential historic district or the contribution of the Palm Point Picnic Grove to the potential historic district.

*Response to Comment V-25*

The comment raises concern that the impacts of the proposed expanded parking, circulation and infrastructure improvements are inadequately addressed in the Draft EIR. The commentor states that these improvements would significantly impact the character of the park. The modifications to the vehicular entrances, streets, sidewalks, landscape and infrastructure within the potential historic district are evaluated in Impact 4.5 in Chapter 4 of the Draft EIR. Based on the evaluation, these modifications within the potential historic district were found not to adversely impact the ability of the potential historic district to convey its significance nor the district’s eligibility for listing in the California Register of Historical Resources, and therefore, the impact is considered to be less than significant.

*Response to Comment V-26*

This comment commends the evaluation of the Lisenby Bandstand and recommends more detail about how the loss will be mitigated.

As discussed in Impact 4.8 in Chapter 4 of the Draft EIR, the Lisenby Bandstand is identified as a contributing feature to the potential historic district. The proposed project will protect the Lisenby Bandstand in place and will restore it. The comment is not clear about what “loss” to which it is referring. The bandstand is currently located within the boundaries of the zoo and is only accessible through paid entry into the zoo. If the comment is referring to a loss of public use, there will be none; the bandstand is already located in the zoo, and there is no change in accessibility as a result of the proposed project, and therefore, not an impact of the proposed project. Please see Response to Comment V-6 regarding the Fresno Chaffee Zoo Corporation’s agreement to rehabilitate the Lisenby Bandstand even though the proposed Master Plans Project would not impact this contributing feature.

*Response to Comment V-27*

The comment recommends that Mitigation Measure 6.0 in the HRA (Appendix B-1 of the Draft EIR) which is also Mitigation Measure 4.8(a) in Chapter 4 of the Draft EIR include a provision that precludes further expansion of the zoo into Roeding Park in the future. Mitigation Measure 4.8(a) would further reduce a less than significant impact associated with the construction of new non-contributing features within the potential Roeding Regional Park Historic District. Since the impact would be less than significant, no mitigation measures would be required; however, the project applicants have agreed to develop historic preservation design guidelines. Future expansion of the zoo would be required to address potential environmental issues associated with such expansion, and include mitigation measures, if required. Any future expansion is not part of the proposed Master Plans Project and therefore, not part of the scope of this environmental evaluation.

*Response to Comment V-28*

This comment asserts that it is not possible to mitigate the expansion of the zoo fence in to the southeastern corner of the park because this change will result in alteration of the open views in this area. Impact 4.3 in Chapter 4 of the Draft EIR acknowledges that the introduction of the proposed fence in the southeastern portion of the park will introduce a physical and visual barrier. Mitigation Measure 4.3 in Chapter 4 of the Draft EIR provides design concepts to reduce the physical and visual barrier to less than significant and create a perimeter that is an element of the park.

*Response to Comment V-29*

This comment refers to the Analysis of Cumulative Impacts Under CEQA in the HRA CEQA Evaluation provided in Appendix B-1 of the Draft EIR. This comment states that the trend at Roeding Park towards filling up the park with money generating venues should be limited and is already diminishing the potential historic district. As discussed in the HRA's cumulative evaluation on page 32 in Appendix B-1 of the Draft EIR as well as in the Supplemental Historical Analysis in Attachment B in this Response to Comments Document, the proposed project will impact individual contributing features of the potential historic district; however, with the implementation of the recommended mitigation measures, the proposed project would not impact the eligibility of the potential Roeding Park Historic District for listing in the California Register of Historical Resources.

*Response to Comment V-30*

This comment raises concerns over the proposed fencing of Storyland and Playland together, which would limit public access to Lake Washington. The proposed project does not include fencing that would limit public access to Lake Washington.

*Response to Comment V-31*

The comment asserts that over 50 percent of the site's contributing features will be impacted by the proposed project. As discussed in the Supplemental Historical Analysis in Attachment B of this Response to Comments Document, the potential historic district includes 23 contributing features. The proposed Master Plans Project will impact 10 contributing features (3 to be demolished, 5 to be

relocated, and 2 to be altered). Therefore, the proposed Master Plans project will impact less than 50 percent of the contributing features.

This comment also states that several historic trees have already been incorporated into the zoo as a result of previous projects. The percentage of the park's trees that have already been incorporated into the zoo, Storyland, and Playland is not known. Figure 2-7 in Chapter 2 of the Draft EIR illustrates the disturbance areas for the Master Plans Project that are planned for two time periods: (1) 2014 or Before and (2) After 2014. The disturbance areas depict general areas that will experience grading to accommodate the proposed project. Specific grading plans have not been developed for the proposed project. As the plans are prepared, the intent is to preserve as many existing trees as possible.

Table 5-3 in Chapter 5 of the Draft EIR shows that approximately 962 trees are subject to removal with the implementation of the proposed Master Plans Project. Of the 962 trees, 811 of the trees have a 6-inch diameter at breast height. Of the 811 trees, there are 710 trees that have a 6-inch diameter at breast height and are not dead or severely diseased. Although the implementation of the proposed Master Plans could result in the removal of these 710 trees, Mitigation Measure 5.2(b) minimizes the removal of these trees to a maximum of 30 percent or 213 trees that have a 6-inch diameter at breast height and are not dead or severely diseased. The implementation of Mitigation Measure 5.2(b) will preserve a majority of the larger trees that were anticipated to be removed as part of the Master Plans Project.

*Response to Comment V-32*

This comment states that additional mitigation measures should be included that requires a listing of Roeding Regional Park on the National Register of Historic Places and have a level 1 HALS documentation prepared for Roeding Regional Park prior to any changes within Roeding Regional Park. These two additional measures will not further reduce potential impacts associated with the implementation of the proposed Master Plans Project. However, the Fresno Chaffee Zoo Corporation and the City of Fresno have agreed to include HALS documentation for the existing ponds (see revised Mitigation Measure 4.1(a) in Response to Comment O-10).

1243 42<sup>nd</sup> Avenue  
San Francisco, CA 94122  
November 14, 2010

By US Mail and by e-mail

Mr. Kevin Fabino  
Planning Manager  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, CA 93721-3604

Re: In opposition to the Roeding Park / Chaffee Zoo development proposal

Dear Mr. Fabino,

I have learned with concern of the plan to destroy part of Roeding Park to expand the Chaffee Zoo. Why would the city of Fresno wish to do this? You are proposing something that detracts from your City. It is unfortunate that open space, no matter how beautifully landscaped, is viewed as fair game for development. The Zoo proposal does just that.

Roeding Park includes over 3700 extraordinary specimen trees from all parts of the world; it is both a park and an arboretum. It is a lovely respite from the crowded City of Fresno, which will only expand as time goes on. The new project will destroy much of the park; it is not possible to relocate such tree specimens without great expense and the real possibility of loss of the trees.

As a landscape architect, I appreciate the beauty of Roeding Park and the need to preserve it from this thoughtless development proposal. It is more than historically important; it is a real asset to the adults, children, and older people of the community.

W-1

Perhaps you can take the funding you have received for this project and build a completely new zoo in another location outside of the densely populated area it is in now. This would give the zoo animals more room, and the current zoo land could be donated to Roeding Park.

People visit zoos only occasionally, but local, beautiful parkland such as Roeding Park is an asset that will be visited often and treasured for future generations.

Sincerely,



Katherine Howard, ASLA  
Landscape Architect

cc: Chris Patillo, HALS

***Katherine Howard - November 14, 2010 (W)***

*Response to Comment W-1*

This comment expresses concern for the loss of urban forest and the expansion of the Fresno Chaffee Zoo into Roeding Regional Park. However, no specific comments on the Draft EIR are provided; therefore, no further response is necessary.

**Law Offices of  
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November 24, 2010

**VIA EMAIL AND ONTRAC OVERNIGHT DELIVERY**  
**[Kevin.Fabino@fresno.gov]**

Kevin Fabino, Planning Manager  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, CA 93721

Re: Roeding Regional Park Facility Master Plan and Fresno  
Chaffee Zoo Facility Master Plan  
Conditional Use Permit No. C-08-186  
Conditional Use Permit for Storm Drain Facility  
Draft Environmental Impact Report  
SCH No. 2008031002  
Date of Public Availability: October 7, 2010  
Comment Due Date: November 24, 2010  
Comments and Objections Submitted by Friends of Roeding Park,  
Roeding Family, Janet Moore, Ed Byrd, and Patricia Ann Espinoza

Gentlepersons:

As the Applicant, City of Fresno, is well aware from my previous communications, this office and Kenneth R. Mackie of the Canelo, Wilson, Wallace & Padron firm represent the interests of the Roeding family, who donated virtually all of the property which the Applicant has identified for the development of the proposed Projects; the Friends of Roeding Park, a California unincorporated association, having its principal place of business in the City of Fresno; and residents of the City and County of Fresno, including, without limitation, Janet Moore, Ed Byrd, and Patricia Ann Espinoza.

The following comments and objections are submitted on behalf of my clients, who are acting on behalf of themselves and the public interest, as private attorneys general, pursuant to Code of Civil Procedure section 1021.5.

## INTRODUCTION

At the outset, these Commentators want to bring to the lead agency's attention a preposterous misstatement of fact which sets the tone for and permeates this misleading and grossly inadequate environmental review document.

Specifically, the Executive Summary makes the following unsupported and conclusory statement:

### **“Areas of Controversy/Issues To Be Resolved**

There are no areas of controversy or issues to be resolved with the Master Plans Project.”  
[DEIR, Executive Summary, p. S-3]

This statement constitutes neither substantial evidence nor does it comply with the procedural requirements of the California Environmental Quality Act (“CEQA”) [Public Resources Code (PRC) section 21000 et seq.].

The Public Resources Code defines abuse of administrative discretion under CEQA in PRC section 21168.5, as follows:

“21168.5. In any action or proceeding, other than an action or proceeding under Section 21168, to attack, review, set aside, void or annul a determination, finding, or decision of a public agency on the grounds of noncompliance with this division, the inquiry shall extend only to whether there was a prejudicial abuse of discretion. Abuse of discretion is established if the agency has not proceeded in a manner required by law or if the determination or decision is not supported by substantial evidence.”

X-1

PRC section 21082.2, subd. (c), provides, as follows:

“21082.2.

...

(c) Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

Likewise, CEQA Guidelines, section 15384 provides:

(a) "Substantial evidence" as used in these guidelines means enough relevant

information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.

(b) Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

X-1  
CONT

Based on the foregoing authorities, the DEIR statement regarding the absence of “Areas of Controversy/Issues to be Resolved” is “argument, speculation, unsubstantiated opinion or narrative and does not constitute substantial evidence and is meaningless. This statement should be deleted from the EIR or revised to provide substantial evidence relevant to the potentially significant adverse impacts to the physical environment caused or generated by the proposed Master Plans and Conditional Use Permit.

**1. Failure to disclose, analyze, and consider the fact that Roeding Park is a federally protected resource**

The DEIR fails to disclose that Roeding Park, since 1980, according to the U.S. Department of the Interior, National Park Service, has been a federally protected resource under the Land and Water Conservation Fund (LWCF) Act of 1965, when the City of Fresno accepted an LWCF development grant in the amount of \$127,000.00 for the refurbishment of the tennis courts in the park (see attached documentation).

Section 6(f)(3) of the Act states:

“No property acquired or developed with assistance under this section shall, without the approval of the Secretary, be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location.”

X-2

This section 6(f) protection extends not only to the tennis courts, but, rather to the entire Roeding Park open space resource. Although zoos are generally included in California’s adopted outdoor recreation plan, indoor venues such as restaurants, conference and meeting centers, indoor exhibit halls, movie theaters, and similar buildings designed for indoor activities are not. These commentators respectfully submit that the status of Roeding Park as a federally-protected section 6(f) resource be fully disclosed, analyzed, and considered in a Revised DEIR, so that the

state and federal agencies that oversee the LWCF program may be properly informed and given the opportunity to comment upon the indoor portions of the Master Plans Project proposals.

X-2  
CONT

**2. Failure to circulate Notice of Preparation and Draft EIR to the federal agencies, with jurisdiction over Roeding Park, including the National Park Service**

In light of the fact that the City is required to obtain the approval of the Secretary of the Department of the Interior for the proposed conversion of a substantial portion of Roeding Park into non-open space uses and the fact that the lead agency has failed to demonstrate any effort to consult with the federal agencies responsible for the environmental review required pursuant to the National Environmental Policy Act (NEPA) [42 U.S.C. § 4321 et seq.], the California Environmental Quality Act ("CEQA") requires the Applicant to revise and re-circulate the DEIR and should prepare a Joint Environmental Impact Statement and Environmental Impact Report. [Public Resources Code (PRC) section 21000 et seq., section 21083.7; CEQA Guidelines (Cal. Code of Regs., Title 14, section 15000 et seq.), sections 15088.5 and 15222-15223; see, also, Remy, Thomas, Moose & Manley, *Guide to CEQA (California Environmental Quality Act)*, Solano Press Books, Eleventh Edition, 2006 (hereinafter referred to as "*Guide to CEQA*"), at pages 702-705, noting at p. 705 that "Section 102, subdivision (D) of NEPA (42 U.S.C. § 4332, subd. (D))... does not authorize federal funding agencies to rely on *locally*-prepared documents. See *Greenspun v. Federal Highway Administration* (D.Md. 1980) 488 F. Supp. 1374, 1378-1380."]

Under the circumstances of the proposed expansion into the federally protected Roeding Park open space resource, the omission of this material fact constitutes substantial new information which is significant in the context of the analysis and consideration of the potentially significant adverse impacts to the historic resources within Roeding Park and the Fresno Chaffee Zoo.

X-3

Finally, since the federal environmental impact analysis pursuant to NEPA does not allow for a statement and finding of overriding considerations, the potential significance of the substantial adverse impacts to federally protected open space resources is critical and requires a good faith effort at full disclosure and analysis under NEPA of alternatives which would avoid the impacts to the federally protected section 6(f) resources within Roeding Park as a whole and as a nationally protected historic landscape. Moreover, given the evidence that the expansion of the Fresno Chaffee Zoo into the federally protected open space will cumulatively impact over sixty percent (60%) of the total Roeding Park, this is a potentially significant impact on the federally protected section 6(f) resource. [See, Comments of Chris Pattillo, PGAdesign, inc., which are incorporated herein by reference, at page 3.] Thus, the project alternatives analysis under NEPA could be substantially more stringent than the project alternatives analysis pursuant to CEQA.

Therefore, the failure of the lead agency to notify the federal agencies which have jurisdiction over Roeding Park, including the Department of the Interior, National Park Service, of the Notice of Preparation or the Draft EIR or to consult with those agencies in a good faith effort to avoid or minimize potentially significant adverse environmental effects, is an abuse of discretion which requires the revision and re-circulation of the Draft EIR and the preparation of a Joint EIS/EIR environmental review document under CEQA Guidelines, sections 15088.5 and 15222-15223.

[See, DEIR, pp. 2-41 to 2-43 and Appendices A3, pp. 58-60 and A4, pp. 104-106; no federal agency listed on the “NOP Distribution Lists” for the 2008 and 2009 NOPs, respectively.]

In the final analysis, there is simply no mention of the Secretary of the Department of the Interior’s discretionary approval required for the development of the proposed Projects, nor is there any reference of the need for a Finding of No Significant Impact or any other federal environmental review of the proposed Projects, pursuant to NEPA. This is not the good faith effort at full disclosure mandated by CEQA and constitutes an intentional effort on the part of the lead agency to avoid disclosing significant information to the public and to the public decision-makers who are charged with the duty to disclose, analyze, and consider ways to avoid and/or reduce substantial adverse impacts to the physical environment from the approval of the proposed projects.

X-3  
CONT

The DEIR must be revised and re-circulated, accordingly.

### 3. Failure to include Tree Survey Results

At the Historic Preservation Commission (“HPC”) meeting of October 25, 2010, the Commissioners acknowledged on the record that they had not located a Tree Survey in the DEIR, nor had the lead agency provided them with such a survey. [Transcript of hearing.] Similarly, Chris Pattillo at PGAdesign, inc. states in her comment letter that she was unable to find the Tree Survey referred to in the Page + Turnbull assessment, which references a tree survey prepared by Arbor Pro, Inc., [Pattillo Comment Letter, p. 3, final paragraph]

As a result, Tables 5-1 through 5-4 found in the DEIR at pages 5-22 through 5-27, are not supported by, nor is the primary information and data included in the Arbor Pro, Inc. “Tree Survey” disclosed to the public and to the public decision-makers. This is particularly important, because the Commentator’s experts cannot inspect or validate the summary data provided in the DEIR, and because Commentators have been informed by George C. Roeding III, who is a licensed Arborist, that certain tree species are deciduous and may appear to be diseased or dying during certain times of the year. Consequently, without being provided the date of the inspection of the specific trees and the specific location, both the public and the public decision-makers are deprived of crucial data and information and the right to participate in a meaningful fashion in the environmental review process mandated by CEQA, in violation of CEQA Guidelines, p. 183, section 15201; see, “Note” section and case citations following the section; and, see *Concerned Citizens of Costa Mesa, Inc. v. 32nd District Agricultural Association* (1986) 42 Cal.3d 929, 231 Cal.Rptr. 748, cited in *Guide to CEQA, supra*, p. 34.]

X-4

In addition, the DEIR’s incorporation by reference of the Arbor Pro, Inc. “Tree Survey,” without providing the public access to the document and informing the public where the document may be available for inspection violates CEQA Guidelines, p. 148, section 15150, subd. (b).

Therefore, without providing the public and public decision-makers with the location of and access to the specific documentary evidence which allegedly supports the assertion in the DEIR

that over 300 trees are dead, diseased, or dying and must be removed, violates the “good faith effort at full disclosure” standard referred to in CEQA Guidelines, p. 149, section 15151, citing PRC sections 21061, 21083, and 21100 and *San Francisco Ecology Center v. City and County of San Francisco* (1975) 48 Cal.App.3d 584.

X-4  
CONT

**4. Failure to disclose, analyze, consider significant impacts to parking and failure to provide reasonable alternatives and mitigation measures**

Section 9 of the DEIR purports to address the parking needs and impacts caused by the Park and Zoo Master Plans. [DEIR, pp. 9-1 through 9-5]

At page 9-5, the DEIR states:

“Roeding Regional Park would have 76 acres of landscaped, or public, land under the Master Plans. Assuming this land is considered “active recreational area,” the park would need 662 parking spaces to comply with the 1 space per 5,000 square feet requirement (76 acres x 43,560 sq. ft. per acre / 5000 sq. ft. = 662 parking spaces). *The proposed 1,205 on-site parking spaces exceed this requirement by 543 spaces. The additional spaces could be considered available for Fresno Chaffee Zoo and Rotary Storyland*

and

*Playland parking. As such, under normal conditions, the Master Plans Project would have a less than significant impact as to parking.*

**Special Events**

Although the future peak daily parking demand resulting from full build-out of the Master Plans Project during the peak months of May and June is approximately 1,137 vehicles, less than the total on-site and off-site parking available, during special events, the total demand for parking may exceed capacity. However, under the Proposed Master Plans, the number of special events that currently are held at Roeding Regional Park are not proposed to be increased. *Therefore, the continued use of a traffic management plan for special events (i.e., quickly collecting tolls at the park entrances and providing on-site grass parking or off-site parking, if necessary) would be needed. The Master Plans project would not increase an impact on the existing parking availability during special events.*” (emphasis added)

X-5

Earlier in the document, the DEIR makes the statement:

“Because these active commercial recreation facilities (i.e., the Fresno Chaffee Zoo and Rotary Playland and Storyland) are and will continue to be located entirely within Roeding Regional Park, the Master Plans Project will not impact the amount of regional park land available to the public, it will simply adjust the ratio of active to passive recreational opportunities within the existing Regional Park.” [Section 3, p. 3-9]

Later in the same section, the document makes the statement:

“Although the City presently has an unmet regional parkland need of approximately 414 acres, the Master Plans Project, after completion, would not result in the net reduction of regional parkland. Specifically, although the Master Plans Project would result in the transfer of land presently used as active and passive recreation areas to the Fresno Chaffee Zoo (21 acres) and Rotary Playland and Storyland (2 acres), the land uses contained within Roeding Regional Park will continue to be recreational in nature since such active commercial recreation is consistent with the City’s vision for providing open space and recreational opportunity to the community.” [DEIR, p. 3-10]

And, further on in the same section, the document states:

“The projected increase in visitors, however, would not generate usage to an extent that such increase would have an adverse impact on the active and passive recreation areas of Roeding Regional Park.” [DEIR, p. 3-10]

As the foregoing sections indicate, the DEIR is internally inconsistent with respect to whether there will be a reduction in the usage of the remaining “active” open space in Roeding Park, which varies from 76 to 118 acres, depending on the section, and whether there will be an exponential increase in the so-called “passive commercial” open space uses of the Fresno Chaffee Zoo. For purposes of public relations, the Executive Director of the Fresno Chaffee Zoo Corporation has been reported stating that the new Sea Lion Cove Exhibit Project is going to be “stellar,” “world class,” and “literally, one of the best sea lion exhibits in the world.” [Scott Barton, on Bill McEwen interview program, on KYNO radio, on November 17, 2010, and, in his Executive Director’s Report to the Fresno County Zoo Authority at the Board meeting on November 19, 2010, when the FCZC was asking for Measure Z funding for the Sea Lion Cove Exhibit Project.]

X-5  
CONT

However, for purposes of determining whether there is a need for more on-site or off-site parking for the Park and Zoo patrons, DEIR concludes that there will be a need for: “*the continued use of a traffic management plan for special events (i.e., quickly collecting tolls at the park entrances and providing on-site grass parking or off-site parking, if necessary) would be needed.*” (cited above) In fact, the DEIR concedes that:

“ During special events and certain holidays such as Easter, however, parking demand exceeds parking availability, and visitors park along nearby streets. On some of these days, the park is closed to additional incoming vehicles after parking reaches full capacity. Special events typically occur on weekends during the spring and fall.” [DEIR, p. 9-1]

Nevertheless, the DEIR concludes that there is adequate parking for the “unreduced” active open space users and the increased number of users of the new exhibits, such as the Sea Lion Cove Exhibit, which will be “literally, one of the best sea lion exhibits in the world.” In addition, the calculation regarding the number of persons who currently use the active open space is flawed and under-counted, due to the fact that the count does not quantify or include those

persons who, in order to avoid paying a fee to enter the Zoo, *walk* into the park *without paying and being counted*. In all likelihood these Park users will not be paying to enter the Zoo, where they will not be allowed to bring their own food or barbeque, due to the commercial vendors and restaurants which have the exclusive concession for the sale of food inside the Zoo.

Therefore, the vehicle count and the need for additional *off-site* parking has not been adequately disclosed, analyzed, quantified, or considered. Moreover, parking on the grass and off-site for special events will further impact the use of the open space when other *commercial* special events are scheduled for the Zoo and the Park. As a result, the analysis of the significance of the actual adverse impacts from parking on-site and off-site have not been accurately identified or calculated; and, thus, the mitigation analysis is deficient, due the lack of substantial evidence in the record and the failure to proceed in the manner required by law.

Consequently, these commentators submit that the lead agency must prepare an updated and accurate traffic study and parking study during the busy months of the year, as represented in the DEIR, and the mitigation analysis should be revised and corrected to disclose the true and accurate number of off-site parking spaces which will be required. In addition, the revised parking study should include an analysis of alternative mitigation measures, including the acquisition of off-site parking (just as the Master Plans propose to acquire a 3.7-acre off-site storm water basin, without disclosing where or when it will be acquired).

Furthermore, the revised parking study should consider the use of the cleared Bel-Air Motel site, located on the east side of the Union Pacific Railroad (UPRR) tracks, at the intersection of West Olive Avenue and Weber Avenue, which is owned by the lead agency through the City Redevelopment Agency. In addition, the lead agency should consider the alternative of acquiring the 3-5 acre K-Mart property (now utilized as a “super swap meet”), located to the west of the UPRR tracks on the north side of West Olive Avenue, to the east of the Lyles Development and Lyles Diversified commercial office buildings. The lead agency should analyze and consider re-striping Golden State Boulevard as a linear parking lot or constructing a two-level parking garage, with the first floor below grade and the second level at grade. Likewise, the lead agency should analyze and consider the use of the area south of the existing Park, along West Belmont Avenue, which could be striped for diagonal parking after Caltrans closes the SR 99 and Belmont Avenue freeway interchange. [See comment of former Caltrans employee, Moses Stites, in the NOPs at DEIR, Appendix A-1, pp. 13-14.]

More important, the lead agency should analyze and consider using an electric shuttle buses to transport all Park and Zoo patrons from off-site parking sites, such as those mentioned hereinabove, in order to reduce the on-site parking (9 acres) and thoroughfares, to reduce air pollution from traffic congestion during special events, and to provide efficient pick-up and transportation of disabled patrons to the Zoo, Storyland, Playland, and Park. This readily available and feasible alternative would facilitate traffic circulation, traffic safety, and efficient and convenient parking for all patrons, especially for ADA compliance purposes, with reduced air pollution and reduced impacts to the existing open space within the Park. Moreover, this alternative would result in safer access for disabled patrons who will have to cross the UPRR tracks east of Golden State Boulevard.

X-5  
CONT

**5. Failure to disclose, quantify, analyze, and consider adequately the significant adverse effects on traffic circulation at the Belmont Avenue/SR 99 interchange and the Olive Avenue/SR 99 interchange**

As referred to above, in Appendix A-1, at pages 13-14, Caltrans representative, Moses Stites makes the following public comment:

“Moses Stites, Caltrans

Mr. Stites stated that that (*sic*) the EIR must address the Belmont Avenue/State Route 99 Interchange since it is scheduled for closure within the next 10 years. Mr. Stites explained that the purpose for closing the interchange is the insufficient spacing between the interchange and the State Route 180/State Route 99 interchange to the south.

In addition, Mr. Stites indicated that the EIR must address the planned expansion of State Route 99 from 6 lanes (3 in each direction) to 10 lanes (5 in each direction). With regard to timing, Mr. Stites stated that initially the highway would be expanded to 8 lanes (4 in each direction) in the near term and full build out to 10 lanes would occur in the future. No specific year for full build out was given.”

Despite these specific comments by the representative of a responsible agency, the DEIR completely fails to discuss the proposed closure of the Belmont/SR 99 freeway interchange, due to the impermissibly short distance between the westbound SR 180 and northbound SR 99 freeway interchange and the northbound off-ramp onto West Belmont Avenue. The DEIR fails to disclose, analyze, or consider the fact that as traffic increases on westbound SR 180 and northbound SR 99, the traffic circulation and safety hazard impacts of stacking on the northbound off-ramp onto West Belmont Avenue will increase, thereby resulting in the closure of this freeway interchange by Caltrans. There is no mention of this potentially significant adverse traffic circulation and safety impact.

In addition, Section 8 fails to disclose, analyze, and consider the potentially significant adverse cumulative impacts to traffic circulation and safety at the northbound off-ramp onto West Olive Avenue and to the northbound SR 99/ West Olive interchange resulting from the additional traffic impacts resulting from the closure of the SR 99/West Belmont Avenue interchange.

Further, in Section 8, there is no disclosure, analysis, or consideration of the potentially significant adverse impacts to traffic circulation and safety resulting from special events held at the Zoo, including the new “world class” Sea Lion Cove Exhibit Project which will create even greater traffic circulation impacts and vehicle/pedestrian safety impacts.

Finally, at Mitigation Measure 8.2(a), the DEIR finds that there will be “significant and unavoidable impacts” prior to the widening of the Belmont Avenue and SR 99 interchange and the Olive Avenue and SR 99 interchange:

“These mitigation measures require the widening of the Belmont Avenue and State Route 99 (SR 99) interchange and the Olive Avenue and SR 99 interchange. Due to the uncertainty of when these interchanges would be widened by Caltrans, the project’s contribution to potential significant impacts at the interchange ramps in 2030 is considered to remain significant, and therefore, significant and unavoidable.” [DEIR, p. S-3]

However, nowhere in Section 8 or elsewhere in the DEIR is there a disclosure, analysis, or consideration of how the lead agency will address these “significant and unavoidable impacts” until Caltrans elects to widening and improve these two interchanges. This scenario is reminiscent of a similar situation involving the so-called “Fresno 40” project at Friant Road and SR 41, in which the project applicant was disinclined to pay its fair share of the cost of the traffic infrastructure improvements for the project-related impacts on the state-financed infrastructure improvements impacted by its project. [See, *Woodward Park Homeowners Association v. City of Fresno* (2007) 150 Cal. App. 4th 683; 58 Cal. Rptr. 3d 102, in which the Court of Appeal for the Fifth Appellate District held that the project applicant had to pay its fair share of the state-financed traffic infrastructure improvements required for Friant Road and SR 41.]

With respect to the City’s discretionary approvals of the Roeding Park and Fresno Chaffee Zoo Master Plan and CUP projects, there is no mitigation proposed for the future traffic infrastructure improvements which will shifted from the Fresno Chaffee Zoo Corporation and the City to the state taxpayers. The assumption advanced by the DEIR is the Fresno Chaffee Zoo Corporation, a public benefit non-profit corporation, and the City, as the Applicant for the subject projects, should get a *free ride* from Caltrans and the state taxpayers for the necessary traffic circulation and safety improvements at Belmont and SR 99 and Olive and SR 99----if and when they occur. Such an indefinite completion schedule for necessary mitigation measures and the absence of identification of the vague financial source of such costly mitigation violates the CEQA mandate for project specific mitigation with performance standards and a time table set for such mitigation measures.

Since the Measure Z taxpayers’ funds are not authorized for off-site use, where is the Applicant City of Fresno going to obtain its “fair share” of the funding for the impact mitigation measures? The Fresno Chaffee Zoo Corporation has not volunteered to raise such funds for its own project, despite the fact that the Measure Z taxpayers will be paying some \$3.0 million per year to support the Zoo’s operating expenses. According to the Measure Z sales tax initiative, the City of Fresno was supposed to be relieved of future operating and capital infrastructure expenditures for the Fresno Chaffee Zoo Corporation; yet, here we see another potential bottomless pit of public expenditures similar to the Fresno Metropolitan Art Museum and Granite Park projects, which cost City taxpayers millions of dollars in re-financing and transaction costs to issue the bonds to bail out these fail public projects.

X-6  
CONT

The foregoing issues need to be disclosed, analyzed, and considered in the revised DEIR and re-circulated for the public and the responsible and trustee agencies to review and comment on.

X-6  
CONT

**6. Failure to disclose, analyze, quantify, and consider the potentially significant adverse impacts from noise due to the High-Speed Rail project**

According to the DEIR, an evaluation of whether either route of the High Speed Rail (“HSR”) project could potentially affect the Master Plans and CUP Projects, or of whether the Master Plans and CUP Projects could potentially affect the High Speed Rail (HSR) Project is considered speculative at this time. More detailed planning of the HSR is expected to occur in the future and a future EIR/EIS evaluating potential environmental impacts of established alignments will be required.

The commentators submit that the HSR project for California is already far more developed than the “speculative” stage referred to by the DEIR, due to the substantial amount of state and federal taxpayer dollars that have been and continue to be spent for its development and the highly developed plans that have been presented in public meetings throughout the State by the California High-Speed Rail Authority.

The Mayor of Fresno, Ashley Swearengin, has been actively lobbying for federal grants and American Reinvestment and Recovery Act funds to be dedicated for funding the first section of the HSR system through the City of Fresno and has been successful in gaining a ***\$4.3 billion*** commitment from federal officials “that the entirety of federal funding California has received so far must be spent in one of the two Central Valley sections of the project.” Both sections route the HSR through Fresno. (see California High Speed Rail Authority Press Release dated 11/4/2010 attached hereto and incorporated by reference). [Valley Voice, November 11, 2010, p. 3; copy attached hereto.]

X-7

At the same time, Mayor Swearengin has not raised any objections to the location of the HSR route directly adjacent to the proposed Fresno Chaffee Zoo expansion area or the placid and historic Roeding Park. In fact, the Mayor has been reported in the local press to be aggressively ramrodding the project on behalf of the Applicant, to the point where she has alienated numerous state officials by her efforts and by her efforts to obtain \$25 million for the HSR project in the City of Fresno. Either the Applicant City and its Mayor are actively seeking to locate the HSR project in the City, adjacent to the Master Plans projects, or the City is wasting its money trying to do so.

In either case, the DEIR makes no mention of this potentially significant impact and potential colossal waste of taxpayer money if it is later found that the Zoo cannot successfully exhibit the animals it contemplates in such close proximity to the HSR elevated right-of-way. The City of Fresno has full knowledge that the California High Speed Rail Authority has, in fact, narrowed its proposed routes through Fresno to two, both of which will pass by Roeding Park parallel to the Union Pacific Railroad directly adjacent to the Golden State Boulevard side of Roeding Park and the proposed Zoo expansion area identified in the DEIR as “Safari Trails”

areas. The proximity of the HST to the proposed new wild animal exhibits in these areas represents a substantial conflict due to the sound and vibration levels projected to be produced by dozens of daily HSR through trains traveling at approximately 220 mph and the yet-unstudied effects of such constant noise and vibration on the Safari Trails animals, many of which are presumed by the commentators to be world-wide endangered species.

There is no disclosure, analysis, or consideration of the substantial potentially significant adverse impacts from noise from the HSR traveling 80 times per day at heights over 60' above the Zoo animals and the persons attending events at the Park and the Zoo. In addition, the DEIR fails to disclose the location of the information relied upon by the EIR preparer and there is no identification of the location where the public may gain access to the sources of information relied upon by the DEIR preparer or where the public might obtain a copy of the Draft EIS/EIR for the HSR project, as required by CEQA Guidelines, section 15150, previously cited above.

X-7  
CONT

The foregoing issues need to be disclosed, analyzed, and considered in the revised DEIR and re-circulated for the public and the responsible and trustee agencies to review and comment on. In addition, the Socio-Economic impacts of the construction of the HSR project adjacent to the Park and the Zoo are sufficiently known or susceptible of discovery, so that the assertion that the potentially significant adverse impacts of the HSR project's construction is a canard and should be rejected out of hand. The lead agency has the duty to locate and disclose the readily available relevant and material information in the DEIR. Therefore, the DEIR should be revised and re-circulated, accordingly.

#### **7. Failure to disclose, analyze, quantify, and consider the potentially significant adverse impacts from Project's energy consumption**

The commentators acknowledge the DEIR proposes, in Mitigation Measure 10.1(a) that the Project "Provide shade (within 5 years)..." as well as "Install a solar power system in at least one onsite location." However, there is no discussion of the existence, nor impacts of the proposed removal of the already-existing canopy of mature trees that provide substantial shade today nor an evaluation of the capacity of one onsite solar power system to adequately mitigate the substantial increase in power consumption proposed by the Master Plans Project. Proposed Project components will require far more energy than the Park alone, but these amounts are not quantified. As an example, the Sea Lion Cove exhibit will presumably require sizable (~5hp?) electric water pumps operating 24/7 through filtration equipment to maintain water quality. Also, larger indoor venues proposed such as the restaurant, indoor exhibit halls (Diversity of Life Pavilion and new Educational Center) will require heating and air conditioning (HVAC) of size and scope not currently used in the mostly outdoor exhibits and outdoor patio dining areas of the Zoo.

X-8

Furthermore, Playland/Storyland's proposed indoor 3D Movie theater is presumed to require significant energy for HVAC, lighting and movie projection equipment. Again, these amounts are not analyzed or disclosed. Similarly, the disclosure and discussion of the use of renewable energy sources on-site is not addressed in an adequate manner. The revised DEIR should disclose, analyze, and consider the alternative and readily feasible and available use of

Photo-Voltaic and Photo-Thermal solar technology should be considered, in order to reduce the use of fossil fuel energy, to save money, and to demonstrate the science of renewable energy to the school children and other visitors to the Park and the Zoo.

In fact, the Financial Statements of the FCZC submitted to the Fresno County Zoo Authority in support of the Zoo's request for Measure Z funding at the November 19, 2010 meeting of the FCZA Board reported that the Zoo is expending \$400,000 per year for utilities. Certainly, the Zoo should be required to disclose, analyze, and consider this money-saving alternative---especially, in view of the fact that taxpayers' funds will be supporting the operating expenses of the Zoo to the tune of \$3.0 million per year. With an annual utility budget of \$400,000, there is substantial justification to consider this energy-saving, GHG reduction, and money-saving alternative. More to the point, there are programs under which the Zoo could generate all of its own energy within the current Zoo footprint on the roofs of the restored and repaired structures, along with the new ones, such as the Sea Lion Cove Exhibit---and sell the surplus energy back to PG&E.

X-8  
CONT

The Section on Energy should be substantially revised and include the analysis referred to hereinabove in the Revised DEIR and re-circulated to the public and the responsible and trustee agencies, such as the California Energy Commission and the California Public Utilities Commission, which have a bona fide interest in this subject within their respective jurisdictions.

**8. Failure to disclose, analyze, quantify, and consider the potentially significant adverse Project impacts to Regional Air Quality as a result of the proposed removal of 811 trees**

Although referenced in the Page + Turnbull Historic Resource Assessment, the DEIR does not include a copy of the Arbor Pro, Inc. tree survey, which these commentators submit represents a fatal flaw in the DEIR.

The impacts to air quality, carbon sequestration, greenhouse gas reduction and global climate change by the removal of 811 large, mature trees proposed by the Master Plans Project are also not disclosed or evaluated in the DEIR's Air Quality Impact Assessment. It is our understanding that the URBEMIS2007 (Version 9.2.4) computer modeling program used in the analysis does not calculate the air quality impacts of removing trees in accordance with the National Ambient Air Quality Standards, particularly as these standards are applied in the currently designated San Joaquin Valley Air Basin nonattainment area for ozone precursor pollutants. The UFORE model and data-collection methodology provides a relatively easy and low-cost means of assessing and quantifying urban forest structure and functions in cities across the United States and we recommend that this widely-used program be utilized to analyze the current average annual carbon sequestration rate for each Roeding Park tree slated for removal (studies have shown that a typical urban tree removes 66 kg CO<sub>2</sub> (146 lb) per year x 811 = 118,486 lbs/2000=59.2 tons).

X-9

While the DEIR discusses California AB 32 in some detail, a plan for the City's voluntary participation in statewide efforts to preserve and expand urban forests as a means to mitigate

climate change in support of the spirit AB 32 is not discussed. The DEIR does not disclose the costs associated with the Project's removal and/or transplanting of trees outside of the Zoo's footprint nor does it identify the funding sources for such removal and/or transplanting or the costs of mitigating the effects of increased micro-climate temperatures within Roeding Park on ROG and NOx, which are precursors to ozone formation, caused by the reduction of shade now provided by the existing mature trees.

X-9  
CONT

Mitigation measures such as the trees will be "replaced by the same species of tree at a ratio of between 1.0 to 5.0 trees per tree lost" and "the design of the relocated grove area(s) shall reflect the current landscaping and natural setting of the existing grove area(s)" are not specific enough nor adequately analyzed to properly disclose to decision-makers or to the public the adequacy of such proposed replacement trees to replace the large, 100-year-old trees in terms of long-term carbon sequestration, shade loss or pollutant absorption.

**9. Failure to disclose, analyze, and consider the incompatible land uses identified in the DEIR as active open space uses and passive commercial open space uses**

In the DEIR, the primary rationale for allowing the Applicant to proceed with expropriating from the Fresno public more open space and green space is that the passive commercial open space uses will be utilized by the people who are unable to use the active open space which is being confiscated for use by the Zoo, its members, and paying members of the Fresno community.

These commentators note two inadequacies in the DEIR with respect to the Applicant's rationalization for removing additional active open space from the public, when the City is already deficient under its own General Plan standards.

First, there is no disclosure of evidence of a General Plan zoning matrix which identifies passive enclosed commercial open space as a land use or zoning allowed under the land use and zoning designated as "Open Space."

X-10

Second, since there are federal discretionary actions required for the approval of the Master Plans and CUP entitlements (Department of the Interior and the U.S. Department of Agriculture), the Joint EIS/EIR should include an analysis of the Environmental Justice issues which are not disclosed, analyzed, or considered in the DEIR. President's Executive Order requiring Environmental Justice policies and guidelines for all federal agencies should be disclosed, analyzed and considered in the Revised DEIR for two major reasons:

1) The majority of the current users of Roeding Park (outside the enclosed Zoo) are persons of color, such as African-Americans, Latin-Americans, Asian-Americans, and other minority groups in the City and County of Fresno; and 2) Although the Fresno Chaffee Zoo Corporation is funded by taxpayers' funds for its operations and the capital expenses to be incurred for the construction of the Zoo infrastructure in the Zoo footprint and in the proposed Zoo expansion area, there is no person of color on the Fresno Chaffee Zoo Corporation Board or the Fresno County Zoo Authority, the public agencies charged with the control and oversight of the expenditure of these public funds. This socio-

economic issue and impact on the local minority community which uses Roeding Park should be disclosed, analyzed, and considered in the Revised DEIR.

X-10  
CONT

**Conclusion**

On behalf of the commentators and my clients, we respectfully submit that the lead agency must prepare and re-circulate a Revised Draft EIR responding to the foregoing deficiencies in this legally inadequate environmental review document to the public and to the public decision-makers charged with the responsibility of reviewing and certifying the Final EIR.

X-11

Respectfully submitted,

  
RICHARD L. HARRIMAN

Enc.: Attachments [Hard Copies to follow]

cc: Clients  
Fresno Bee  
Valley Voice

dents upset by large increases in their city water bills -- and also by Townsend's \$160,000 annual salary and the \$100,000+ salaries paid to more than a dozen other city officials. Townsend, 49, who has been out on a medical leave after receiving heart stints earlier this fall, confirmed this week his decision to quit was spurred by ongoing threats and intimidation directed at him and his family. The city council issued a letter late Friday thanking him for his years of service and Lindsay Mayor Ed Murray called Townsend "a visionary."

\*Last week's **heavier-than-expected vote** -- especially by those who took advantage of the vote-by-mail option -- clearly caught county election officials by surprise. In the days leading up to the Nov. 2 vote, election officials were predicting no more than 30 to 35 percent turnout by registered voters. Instead, turnout in Tulare County is expected to total 54 percent, according to Hiley Wallis, Tulare County's chief deputy treasurer-tax collector. Since Nov. 2, the county election office has been processing 19,700 mail-in and provisional ballots and Wallis reports that it's likely a final election tally will not be certified until some time around Thanksgiving.

→ \*More hopeful signs emerged last week that the first segment of California's proposed **\$43-billion high-speed rail** system will be built in the Central Valley. Federal government officials indicated on Nov. 3 that they want all initial funding of the project -- nearly \$2.5 billion -- directed to construction of a single segment either between Fresno and Merced or Fresno and Bakersfield. The Central Valley portion of the route would form the backbone of a system linking San Francisco and Anaheim. Eventually, the system would connect to Sacramento and San Diego. Rob Kulat.

\*Tulare County supervisors recently approved the donation of the county surplus vehicle to Farnerville and Krstic said the truck replaces a well-used 1998 Ford F150 pickup equipped

a major source of citizen complaints. "I'm getting more animal complaint calls than road issue calls," he said.

Traditionally calls or complaints about road and street conditions are at

a spokesman for the Federal Railroad Administration, said the focus on the Central Valley was made in collaboration with the California High-Speed Rail Authority. Under the current proposal, a total of \$4.3 billion in federal and state funds would be targeted for one of the Central Valley sections. Officials say they want to pump the first few billion dollars into the economy as fast as they can and build an operational piece of the system quickly. "We want to get people working," Kulat said. It's still not clear how or when the California High-Speed Rail Authority would secure the tens of billions of dollars needed to finish the first phase of the project. The proposed route between Bakersfield and Fresno runs west of state Highway 99 for 113 miles. Planners, who estimate that the Fresno-Bakersfield trip would take 37 minutes, hope to break ground on the first section of track by 2012.

\*A raw milk cheese product sold at Costco warehouses and made by Traver-based specialty cheesemaker **Bravo Farms** was linked to a multistate outbreak of E. coli. The cheese -- Bravo Farms' Dutch Style Gouda -- was made by Bravo Farms at its Traver facility and sold between Oct. 5 and Nov. 1 in 1.5-pound packages in about 50 Costco warehouses in Arizona, Colorado, New Mexico, Nevada and Southern California. Costco officials say Valley



Costcos never carried the product. Late last week Bravo Farms initiated a voluntary recall of its product. Jonathan Van Ryn, one of Bravo Farm's partners, said via e-mail, "We're working with the FDA right now." The Food and Drug Administration alerted the public to the outbreak on its website last Friday. Siobhan DeLancey, a spokeswoman for the agency, said it's still not clear what caused the contamination. Individual Costco stores are using purchase records to alert consumers who bought the cheese -- Costco item 40654. The cheese sold or sampled at Costco stores has been linked to illnesses in 25 people, including one in San Diego. No deaths have been reported, but nine people were hospitalized -- one with possible kidney failure, the FDA reported. And this week, an Arizona woman filed a lawsuit seeking reimbursement for medical expenses after she claimed Bravo cheese she sampled at a Phoenix area Costco sent her to the hospital for three days.

On Tuesday, Bravo posted the following message on its website: "First and foremost to the people sickened in recent weeks, we are taking this very seriously and are deeply saddened. We've never chosen profits over our customers, and will continue to make decisions based on your safety not the safety of the company. We are working to be certain our cheeses are completely safe, and to identify the cause of this tragedy. We pray that God gives us wisdom to make the best decisions on locating the source, and to also keep anyone else

## MERCED TO FRESNO & FRESNO TO BAKERSFIELD HIGH-SPEED TRAIN PROJECT

### Public Information Meeting

The planners of California's high-speed train project invite you to a public meeting to review the selection of options being studied for the train's path through the city of Fresno. The California High-Speed Rail Authority is studying several alternatives, some of which are at ground level and others that are above the ground on long bridges. All of the options are adjacent to existing railroad lines. The goal is a path that minimizes impacts to existing freeways and streets and allows for electrified trains to travel up to 220 mph through Fresno and access a downtown station.

The project's planners are seeking your input on which alternative(s) you prefer and your ideas and comments on high-speed train features such as the location of a station in downtown Fresno. Representatives will be on hand to answer your questions and listen to your ideas. Please come join us for this discussion, and invite a friend or neighbor.

### Reunión de Información Pública

Los urbanistas del Proyecto del Tren de Alta Velocidad de California le invitan a participar en una reunión pública donde se revisarán la selección de opciones que están siendo estudiadas para el trayecto del tren a través de la ciudad de Fresno. La Autoridad del Tren de Alta Velocidad de California está estudiando varias alternativas, algunas de las cuales son a nivel del suelo, y otras que presentan estructuras por encima del nivel del suelo, como en el caso de los puentes de larga distancia. Todas las opciones son adyacentes a las vías de ferrocarril existentes. El objetivo es un trayecto que minimice los impactos a las autopistas y calles existentes, y permita a los trenes eléctricos viajar a una velocidad de hasta 220 millas por hora a través de Fresno y acceder una estación en el centro de la ciudad.

Los urbanistas del proyecto solicitan su opinión en relación a cuál(es) alternativa(s) Usted prefiere, y también sus ideas y comentarios en cuanto a las características del tren de alta velocidad, como por ejemplo la ubicación de una estación en el centro de la ciudad de Fresno. Representantes de la Autoridad estarán disponibles para contestar sus preguntas y escuchar sus ideas. Por favor acompañenos, e invite a un amigo o vecino a que también participe.

For more information please contact Eric VonBerg at (559) 256-1458



CALIFORNIA  
HIGH-SPEED RAIL  
AUTHORITY



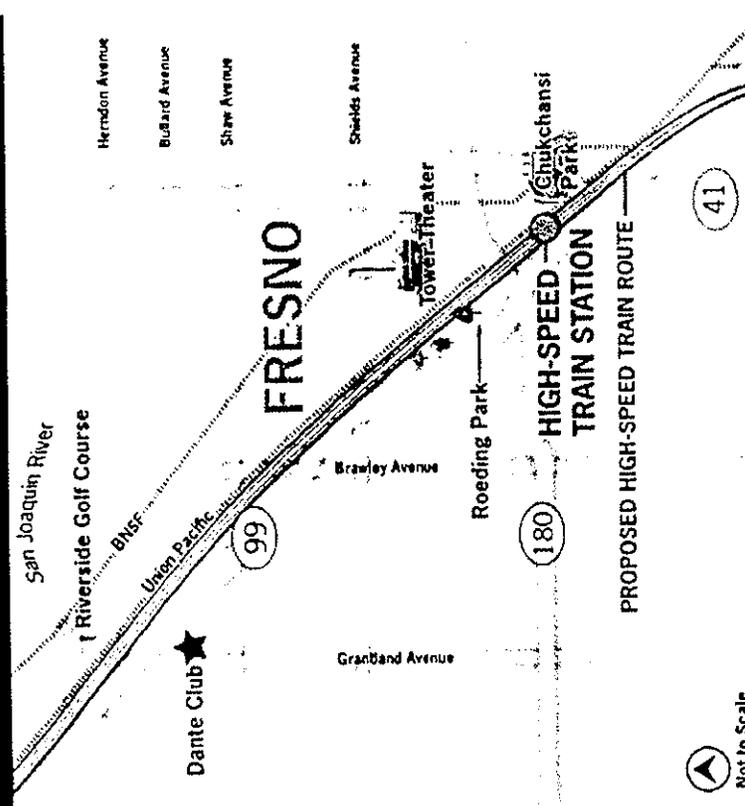
U.S. Department  
of Transportation  
**Federal Railroad  
Administration**

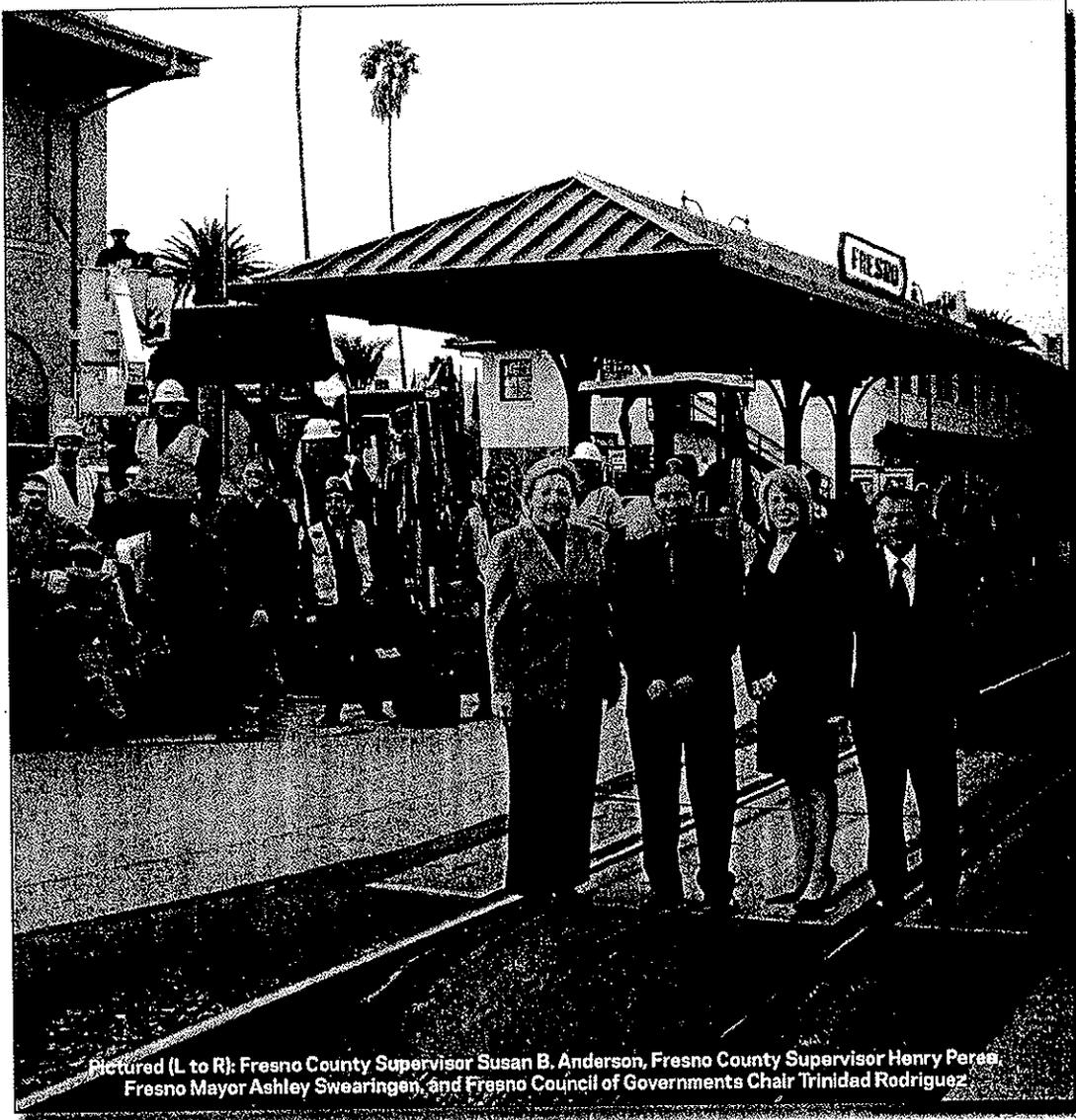


All facilities are handicap accessible

**March 16, 2010  
4:00 - 7:00pm**

**Dante Club  
6176 North Grantland Avenue  
Fresno, CA 93723-9334**





Pictured (L to R): Fresno County Supervisor Susan B. Anderson, Fresno County Supervisor Henry Pera, Fresno Mayor Ashley Swearingen, and Fresno Council of Governments Chair Trinidad Rodriguez

Leadership • Vision • Accord

The Heavy Maintenance Facility represents an immense opportunity for the Fresno County community. Realizing its potential will require a determined effort from everyone who calls Fresno County their home. Our role is to guide that effort; marshal resources, generate enthusiasm, coordinate effort, negotiate obstacles, anticipate setbacks and restore momentum when needed. In a larger sense ours is to capture a sustaining vision, one that will galvanize all of Fresno and indeed the State of California around an HMF worthy of the great new enterprise of high-speed rail. We are joined in accord in this venture, together with the Authority to create an HMF that will be a global showcase for high-speed rail, drawing investment and commerce from around the world.

**That is the Fresno Works promise.**



## County of Fresno

BOARD OF SUPERVISORS  
SUPERVISOR SUSAN ANDERSON – DISTRICT TWO  
SUPERVISOR HENRY PEREA – DISTRICT THREE

January 14, 2010

Mehdi Morshed  
Executive Director  
California High Speed Rail Authority  
925 L Street, Suite 1425  
Sacramento, CA 95814

Dear Mr. Morshed:

It is with great pride that we, Fresno Works, submit this Heavy Maintenance Facility Expression of Interest to the California High Speed Rail Authority. Fresno Works is an unprecedented coalition of community leaders dedicated to illustrating to the Authority that the County of Fresno is by far the best location for the High Speed Train Heavy Maintenance Facility. From government to business to labor to education, we represent a wide cross-section of this proud Fresno County community. The Fresno Works effort is collaboration at its best, and we believe the fruits of our labor will yield Fresno County as your ultimate site selection.

First and foremost, the site we are presenting to your Authority is a flexible, unencumbered site close to the mainline and freeway access. Upon review of this expression of interest, you will find all land within our study area is outside of the Williamson Act and would require little to no displacement. We know this site feature is of as much importance to you as it is to our community.

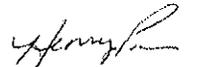
As an incentive for locating the Heavy Maintenance Facility in Fresno County, Fresno Works is prepared to support a process to result in a minimum of \$25 million for land acquisition and site improvements. These funds may be used as the Authority deems appropriate for the Heavy Maintenance Facility.

The County of Fresno boasts a strong and vast work-ready labor force and a wide selection of world-class educational institutions available to train our residents. We envision this site and your Heavy Maintenance Facility as the heart of what essentially could become an international campus for high speed train maintenance. This facility will draw ancillary business and services and the site's surrounding area is ideal for such use.

It goes without saying that the placement of your Heavy Maintenance Facility will impact the County of Fresno and its residents in a phenomenal way. We are eager for you to review the following pages and would be happy to answer any questions that arise. We hope you'll agree with us – Fresno Works.

Respectfully,

  
Susan B. Anderson, Supervisor  
Fresno Works Co-Chair

  
Henry Perea, Supervisor  
Fresno Works Co-Chair



MAYOR ASHLEY SWEARENGIN

January 11, 2010

Mr. Curt Pringle, Chairman  
California High Speed Rail Authority  
925 I. Street  
Sacramento, California 95814

Re: Support for the Fresno Works Proposal

Dear Mr. <sup>Curt</sup> Pringle:

On behalf of the City of Fresno, we are pleased to support the "Fresno Works" proposal submitted by the County of Fresno. The City of Fresno has been an active collaborator in the development of the proposal, and we are committed to doing our part to ensure its successful implementation. The Fresno City Council passed a resolution in support of this proposal on December 17, 2009.

The Fresno Works proposal not only meets all the specifications outlined in the Authority's "Request for Expressions of Interest," but it exceeds the specifications in several key areas. The Fresno Works proposal offers the Authority:

- **A competitive site area of nearly 700 acres** – The Site Area is next to the BNSF right-of-way with excellent highway access, little to no hindrances to land assembly, and access to the only portion of the HSR system where trains will reach true high speeds.
- **Compelling financial incentives** – The Fresno Works proposal offers up to \$25 million to be used for site acquisition, infrastructure, utilities and/or construction.
- **An abundant supply of a qualified workforce and the Central Valley's largest educational and training institutions** – We have already identified over 2,100 people who today meet minimum qualifications likely to be required by the HMF. In addition, every year in Fresno County almost 95,000 people are pursuing higher education and vocational training across over a dozen public and private college campuses. We offer the Authority a robust and comprehensive educational system and can ensure a talent pipeline for the HMF.
- **Access to the region's most robust emergency and medical services** - Central California's emergency response and medical services are headquartered in Fresno County, a critical distinction between Fresno's proposal and other sites, given the size and importance of the HMF to the rest of the HSR system and the nature of the work to be done at the HMF.

Again, please accept our support for the County of Fresno's application. We look forward to working with the Authority to ensure the success of the HMF and the overall HSR system.

Sincerely,

Handwritten signature of Ashley Swearengin in black ink.

Ashley Swearengin  
Mayor

CITY OF FRESNO  
CITY HALL • 2600 FRESNO STREET • FRESNO, CALIFORNIA 93721-3600  
(559) 621-8000 • FAX (559) 621-7990 • [www.fresno.gov](http://www.fresno.gov)

**JIM COSTA**  
20th District, California  
EMAIL: [costajim@house.gov](mailto:costajim@house.gov)  
WEB PAGE: [www.house.gov/costa](http://www.house.gov/costa)  
COMMITTEE ON NATURAL RESOURCES  
Subcommittee on  
Energy and Mineral Resources  
Conservation  
Subcommittee on  
Water and Power

**Congress of the United States  
House of Representatives  
Washington, D.C. 20515**

COMMITTEE ON AGRICULTURE  
Subcommittee on  
Conservation, Forestry, and Fisheries  
Subcommittee on  
Energy, Oceans and Rivers  
COMMITTEE ON FOREstry  
REFORESTATION  
Subcommittee on  
Conservation and  
Management and Forestry

January 6, 2010

The Honorable Curt Pringle, Chair  
California High Speed Rail Authority  
925 L Street  
Sacramento, CA 95814

RE: Support for High Speed Rail Heavy Maintenance Facility in Fresno County

Dear Mr. Pringle:

I am pleased to express my unequivocal support for locating the necessary high speed train heavy maintenance facility in Fresno County. It is my ardent belief that Fresno County is the most advantageous location for the heavy maintenance facility, and will best serve the needs of both the California High Speed Rail Authority (CHSRA) and the traveling public.

My vision and perpetual dedication of bringing a high speed rail system to our state began nearly three decades ago. I believed then as I believe now, California would be the ideal state for the development of High Speed Rail as the 21<sup>st</sup>-century mode of transportation. We are now seeing our common vision, shared during our tenure as state legislators, come to fruition.

CHSRA has been tasked to identify the most effective and efficient siting of not only the routes, but of the necessary support facilities for high speed rail. I am confident a heavy maintenance site in Fresno County can and will provide everything that California needs in the locating of this critical support facility.

The larger Fresno area is well-prepared to provide any necessary assistance and support to bring high speed train service to the Valley. As one of the state's largest and most centrally located cities, Fresno has the necessary resources to help CHSRA make this project a showcase for transportation throughout the world. Furthermore, being centrally located to serve the rail system, Fresno has the population and educational base to best meet the workforce and support needs of a major maintenance and testing facility. Fresno County also has the necessary property ideally located with existing infrastructure to service a maintenance facility of this magnitude.

WASHINGTON OFFICE  
1214 LITTLE ROCK AVE., SUITE 210  
WASHINGTON, DC 20515  
Phone: (202) 225-1341  
Fax: (202) 225-1329

FRESNO OFFICE  
250 E. SHERMAN, SUITE 240  
FRESNO, CA 93711  
Phone: (559) 497-1620  
Fax: (559) 497-1027

SACRAMENTO OFFICE  
2750 M STREET, SUITE 220  
SACRAMENTO, CA 95811  
Phone: (916) 450-1629  
Fax: (916) 450-1021

California High Speed Rail Authority  
January 6, 2010  
Page 2

There continues to be strong and unanimous public support for locating the heavy maintenance facility within Fresno County. With an estimated 1,500 jobs created by the construction and maintenance of this facility, the economy of Fresno and the San Joaquin Valley will be positively impacted. It is refreshing to see so many agencies working alongside Fresno County to ensure this first-rate proposal is presented to CHSRA.

As the Congressman representing the 20<sup>th</sup> Congressional District which includes Fresno, Kings and Kern counties, it is with great expectation and pleasure, I support Fresno County in their efforts to bring the high speed train maintenance facility to Fresno. It is my hope you give Fresno County's proposal your most serious consideration. Thank you in advance for CHSRA's continuing leadership and your attention to this request.

Sincerely,



JIM COSTA  
Member of Congress

cc: Medhi Morshed  
Executive Director, CHSRA

Susan Anderson  
Chairman, FCBOB

Ashley Swearengen  
Mayor, City of Fresno

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**TAB 1  
EXECUTIVE SUMMARY**

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- Traffic and Transportation
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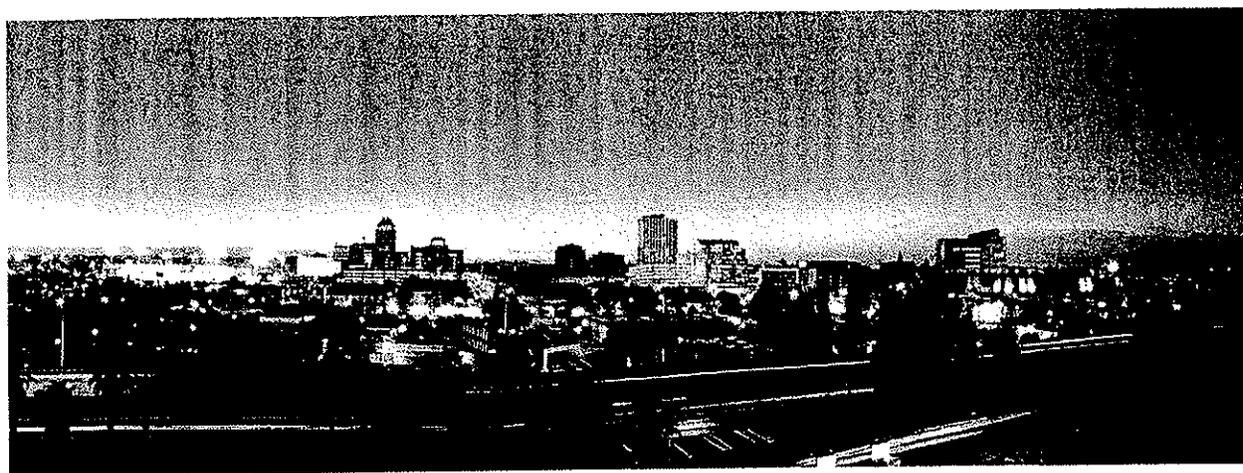
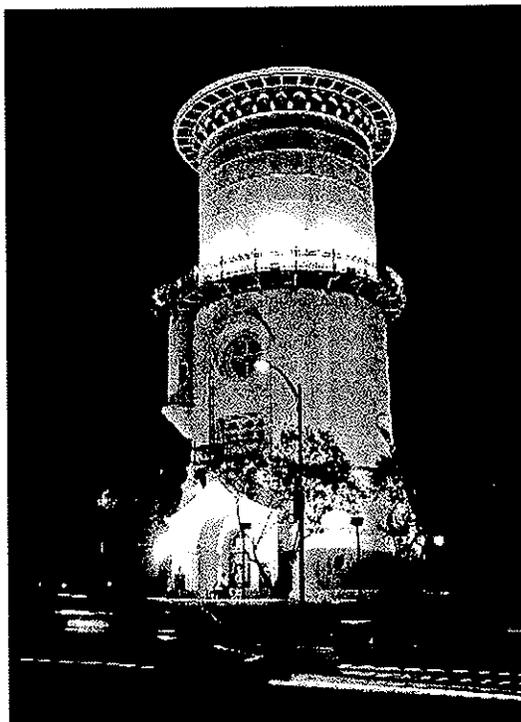
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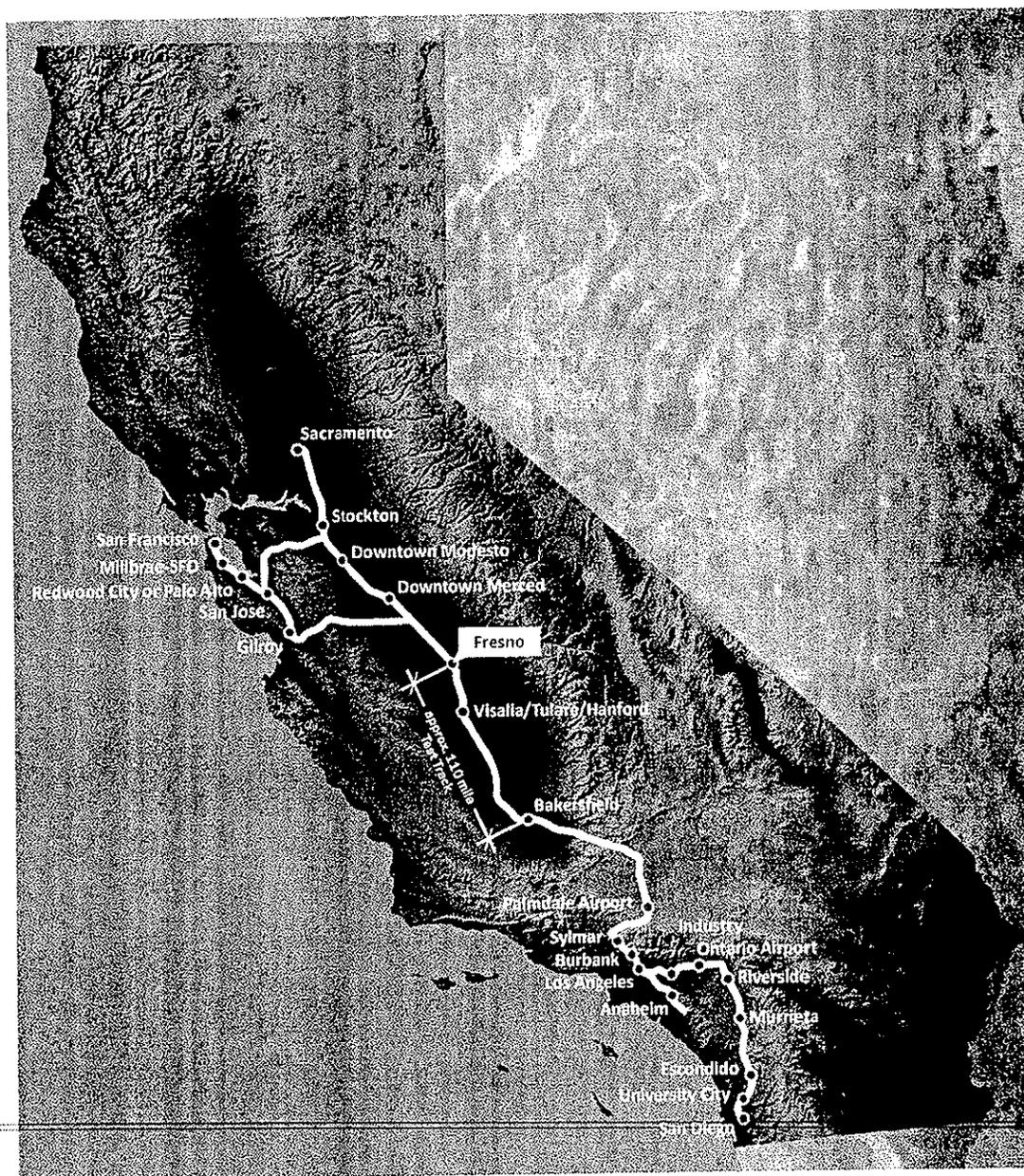
# EXECUTIVE SUMMARY

## INTRODUCTION

We're calling our Expression of Interest for the California High-Speed Rail Heavy Maintenance Facility "Fresno Works." The name echoes a term commonly used for industrial plants of the past. We believe the name is apt, as Fresno County's offering will truly "work" in every respect for the California High Speed Rail Authority.

The Fresno Works proposal provides the exceptional combination of:

- **700 acre** flexible site area to accommodate any HMF configuration
- **Site attributes** that are an ideal match for the Authority's requirements;
- **110 miles** (test track) to Bakersfield;
- **Trained workforce** with over 2,300 candidates already identified today who are a direct match for the HMF skill requirements;
- **\$25 million** in economic incentives that are flexible for the Authority's use; and
- **Extensive emergency response** and medical services headquartered in Fresno.



# EXECUTIVE SUMMARY continued



## UNIFIED SUPPORT

Fresno Works is an unprecedented coalition of officials from the City of Fresno, Fresno County and the Council of Fresno County Governments working together to ensure the success of the California High-Speed Rail initiative and the HMF in Fresno County. These local government authorities have come together in support of this effort to bring forward a technically responsive and compelling expression of interest in locating the HMF in Fresno County. The Fresno County Board of Supervisors and the Fresno City Council have both passed resolutions supporting action to welcome the HMF to Fresno County and provide the financial incentives and cooperation necessary to make it happen. Fresno County is proud of the fact it provided the largest percentage vote of any county in the San Joaquin Valley in support of Proposition 1A, the Safe, Reliable High-Speed Passenger Train Bond Act, on the November 2008 ballot.

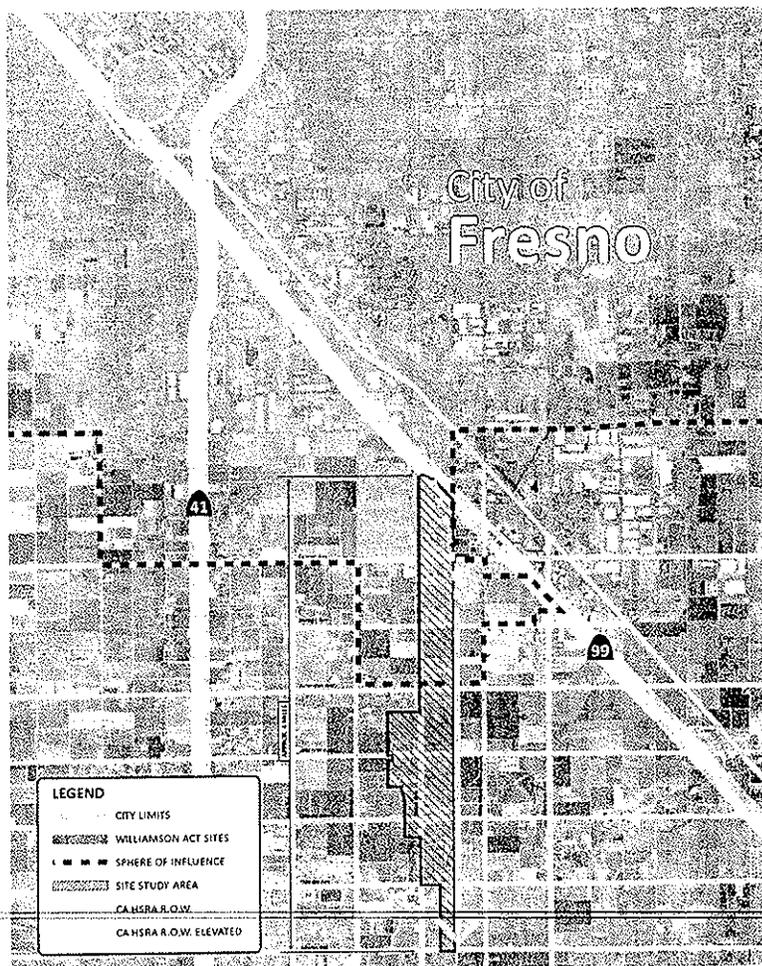
We are very pleased to offer the Authority this expression of interest and believe you will find it to be the most practical, cost-effective and efficient solution for the Authority.

Taking all the elements of our proposal together, it is clear that Fresno County citizens are ready and available to go to work to ensure the success of the California High Speed Rail initiative and its Heavy Maintenance Facility.

## SITE AREA - MAXIMUM FLEXIBILITY

Rather than limit the Authority to a single 150-acre parcel, Fresno County has instead set aside a site area encompassing nearly 700 acres adjacent to the BNSF alignment and partially within the Fresno City limits. This location starts within an area that is already zoned for heavy industrial use and extends south into rural Fresno County, avoiding properties protected by the Williamson Act, as well as avoiding significant impact to prime agricultural land.

The entire site area complies with all the Authority's stated criteria for utilities and other requirements, and poses no discernable issues that may impede development of the HMF. **The Fresno County site would also provide the Authority with an HMF at the north end of 110-miles of flat, relatively straight track, likely without any stations or other interruptions - ideal for the HSR test track.** Several conceptual layouts are provided for the Authority's consideration. There is universal support among the community behind the location. We believe this site area gives the Authority maximum flexibility in how it may wish to develop the HMF.



# EXECUTIVE SUMMARY continued



## ENVIRONMENTAL REVIEW

Fresno County is prepared to assist the Authority in expediting the environmental review process for the site in accordance with CEQA/NEPA as applicable. Currently, the site poses no significant known issues that may hinder development of the HMF, and there is wide support for the location within the community. By working with the Authority and local jurisdictions including state and regional agencies (Caltrans District 06, San Joaquin Valley Air Pollution Control District, CPUJ, CHP) the Fresno Works team believes it can expedite the environmental review process by several months, saving the Authority millions of dollars and getting the project in the ground to meet the 2012 project date. These are important considerations when weighing the timing of ARRA funding available for shovel ready projects.

*"...\$25 million in financial support the Authority can use for site acquisition, infrastructure, utilities and/or construction."*

## WORKFORCE AVAILABILITY

One of the key strengths of the Fresno Works proposal is the depth and breadth of the available labor pool in Fresno County. As the most populated area in the Central Valley, the access to a qualified workforce is abundant. Our proposal outlines an estimate of the size of the workforce ready to go to work today for the HMF, as well as the robust education and training capacity Fresno County offers to ensure a steady pipeline of labor in the future (from vocational training to graduate education all within a 15 mile radius of the proposed site area).

The skilled labor required for the HMF is a perfect fit for our region's labor supply. We understand the HMF would employ people at all levels, but largely technically trained workers will be required. Maintenance and rail machinist-type workers will require technical training degrees. Our educational and training institutions have been close collaborators on this proposal and

have documented their current ability to provide the appropriate levels of technical training required, as well as their willingness to expand education and training programs as required to ensure the success of the HMF. Fresno County has a comprehensive and exceptional educational and training infrastructure to support the required labor market.

## HIGHER EDUCATION

Fresno County has a number of higher education institutions that can provide the trained work force necessary for the development and sustainability of the HMF. Leading the way is Lyles College of Engineering at California State University, Fresno. With more than 1,400 students and a large number of highly qualified faculty in civil, computer, electrical, mechanical and geomatics engineering, and in construction management, the college is a valuable resource for the HMF. In addition, the State Center Community College District, which includes Fresno City College, Reedley College, Clovis Center and Willow International provide nationally recognized vocational education. These institutions can provide education and training in virtually every field and discipline that may be needed by the HMF.

Institution	# of Students
Fresno State University	21,728
Fresno Pacific University	2,649
SCCCD	
Fresno City College	33,763
Reedley College	8,839
Willow International	8,155
Madera Center	4,118
Oakhurst Center	1,033
SCCCD Sub Total	55,908
WHCCD	
Coalinga	3,830
Firebaugh	2,860
Lemoore	7,557
Lemoore/NAS	170
WHCCD Sub Total	14,417
Grand Total	

## ECONOMIC INCENTIVES

In order to maximize the Authority's flexibility in development of the HMF in Fresno County, we have committed \$25 million in financial support the Authority can use for site acquisition, infrastructure, utilities and/or construction. The magnitude of this financial commitment demonstrates our willingness to partner with the Authority in developing the best possible HMF for the CHSR and Fresno County. We believe at this stage it is best to commit to a dollar amount that can be used by the Authority in any number of ways to develop the HMF, as opposed to specifying exactly how the incentives must be used. With this approach, we are providing the Authority with maximum flexibility to invest the funds to produce the most in return.

# EXECUTIVE SUMMARY continued

The body of our proposal outlines potential sources to fund the \$25 million incentive package, which include our local voter approved, half-cent sales tax, Measure C. The Fresno Works team has also been active in exploring public-private partnership opportunities. We have had numerous meetings with private, public and institutional groups anxious to participate in development of the HMF and its ancillary facilities. Knowing the Authority's interest in exploring such public-private options for finance, development and even operations, Fresno Works is prepared to participate with the Authority in developing a PPP option for all or parts of the HMF, if the Authority wishes.

*"Fresno County region has initiated a Plan Amendment process to redirect an initial \$25 million of these funds to the HMF..."*

### FUNDING SOURCE: MEASURE "C"

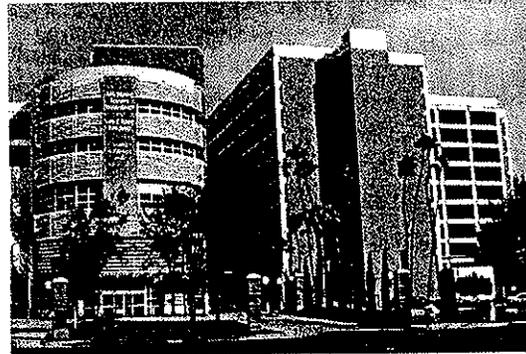
Originally approved by Fresno County voters in 1986, Measure "C" is a 1/2 cent sales tax dedicated specifically to transportation purposes. Over the life of the original measure (1986 to 2006), over \$700 million in revenues were generated to meet the transportation needs of Fresno County. Based on the success of the original measure, in 2006 Fresno County voters reauthorized Measure "C". Over its 20 year life (2007-2027), the new measure is anticipated to raise nearly \$1.7 billion in revenues for a variety of multi-modal transportation projects and programs in Fresno County.

Contained within the Measure "C" Expenditure Plan are two funding programs that have the potential to be redirected to the HMF: New Technology and Rail Consolidation, which between them have the potential of providing at least \$139 million in dedicated funding over a 20 year period to help secure and improve the High Speed Rail Maintenance site. Under the control of the Council of Fresno County Governments and the Fresno County Transportation Authority, with oversight provided by a Citizens Oversight Committee, the Fresno County region has initiated a Plan Amendment process to redirect an initial \$25 million of these funds to the HMF, should Fresno County be selected as the site.

### REGIONAL HEADQUARTERS FOR EMERGENCY RESPONSE AND MEDICAL SERVICES

Fresno has the facilities, services, and specialized training to fully protect the HMF's employees, riders and property. While we certainly hope that none of these resources are required for emergency response or medical services, we believe Fresno's ability to respond to regional-scale emergency and medical incidents is a significant factor in favor of locating the HMF in Fresno County.

provide support with both voice and data interoperability communications. An investment of approximately \$30 million over the last several years has enabled public safety first responders to communicate with 47 agencies across multiple jurisdictions and disciplines, including the law enforcement agencies in 15 cities, fire districts and emergency medical services.

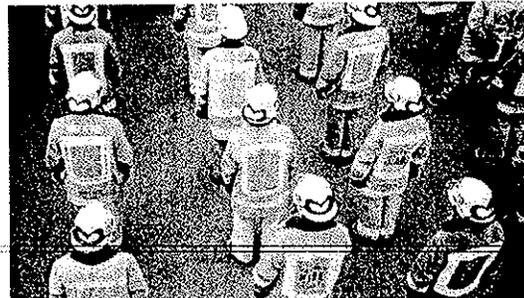


Fresno County is home to Community Medical Centers (Community), the largest provider of health services in the Central Valley serving more than 600,000 people each year. The system's flagship campus is in downtown Fresno, 10 minutes from the HMF site area. The downtown campus operates the only combined burn and Level 1 trauma units between Los Angeles and Sacramento, providing critical care and other specialty services to patients from well outside the primary service region. The downtown campus is also home to one of the busiest emergency rooms in California with 135,000 visits each year. It is the only 24-hour, fully staffed burn center between Los Angeles and Sacramento.

### Community has invested more than \$400 million in its 58-acre Community Regional campus, the largest private renewal project in Fresno County history.

Community has a \$1 billion operating budget, and is the region's largest private employer with more than 6,000 employees and 1,100 medical staff as well as 900 volunteers who serve a 15,000 square mile region of Kings, Tulare and Mariposa Counties.

In addition, the County currently provides dispatch services for emergency medical services in four counties: Fresno, Kings, Madera and Tulare. Fresno County has



For example, in the event of an accident or emergency, the County is able to immediately

# EXECUTIVE SUMMARY continued

also negotiated mutual aid and instant aid agreements with law enforcement and fire agencies in the surrounding four counties and through the County's dispatch center is able to dispatch ambulances, helicopters, fire trucks and mobilize/direct necessary public safety resources.

There are two City of Fresno fire stations and two County of Fresno fire stations all within 4 miles of the Site Area. Between the Fresno and Clovis Fire Departments, there are three Type 1 (highest level) emergency response units, giving Fresno County the most units in that category in the region. Type 1 units include hazardous materials equipment at the highest possible level and can respond to emergencies up to and including incidents involving weapons of mass destruction. The City of Fresno also has 53 people trained in Type 1 emergency response, the highest possible training.

The Fresno Police Department maintains a Level II, S.W.A.T. team capable of responding to all manner of tactical incidents and has specifically trained in the response to passenger rail events. Fresno PD also maintains a Level III Explosive Ordinance Disposal team that is capable of responding to multiple incidents, simultaneously, throughout the City. Both teams have trained separately and together to respond to terrorist incidents, should they arise. The Fresno Police Department also has two department members assigned to the F.B.I.'s Joint Terrorism Task Force here in Fresno.

### FRESNO YOSEMITE INTERNATIONAL AIRPORT

The Fresno Yosemite International Airport is the Central Valley's largest and only international airport. The FYI Airport is located six air miles northeast of downtown Fresno. The Airport serves the six-county region

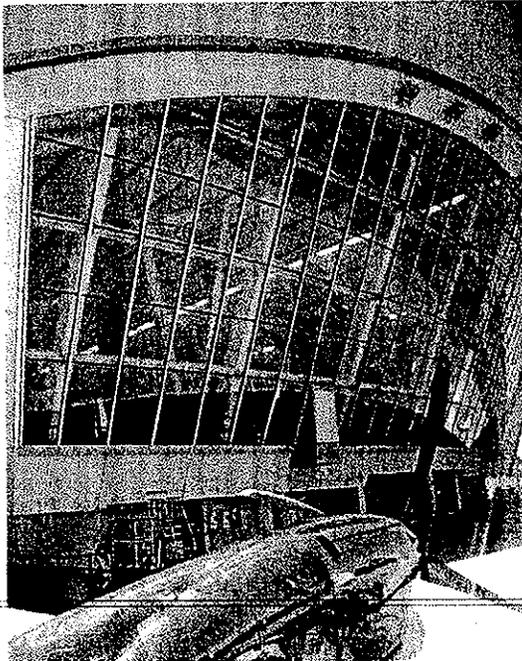


comprising the Central San Joaquin Valley and is the only major international airport in the Central Valley. Airlines offer nonstop flights to regional hubs of major airlines, including Los Angeles, Denver, San Francisco, Phoenix, Salt Lake City, Seattle, and Dallas/Fort Worth. Other destinations include Las Vegas, Portland, and international air service to Guadalajara, Mexico. Carriers currently provide more than 2,070 daily departure seats for Fresno passengers.

### A BROADER VISION

We believe the Fresno Works Expression of Interest is the best choice for the HMF based on (1) our quality site offering, (2) access to an abundant supply of skilled labor and our unmatched network of education and training services, (3) substantial financial incentives, and (4) access to regional emergency response and medical services.

*"...the Fresno Works HMF will be a global showcase for high-speed rail, drawing investment and commerce from around the world."*



However, we want the Authority to understand that Fresno County has a broader vision for what the HMF could represent for California and our nation. We think that as the centerpiece of the California High-Speed Rail system, the Fresno Works HMF will be a global showcase for high-speed rail, drawing investment and commerce from around the world. We envision a facility the nation will look to for direction as various parts of the country develop their own high-speed rail systems. As such, we believe facilities ancillary to the HMF such as a HSR showcase, national training academy, conference center, and research and innovation facility will be developed. Preliminary concepts for such facilities and programs are outlined in our proposal.

### THE HEART OF CALIFORNIA: HIGH QUALITY, LIVABLE AND ACCESSIBLE

Fresno County offers an unmatched diversity of urban and rural amenities; natural beauty, and recreational opportunities, including easy access to three national

# EXECUTIVE SUMMARY continued

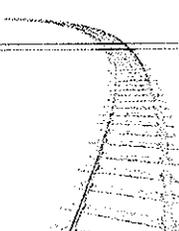
**parks, national forests and wilderness areas.** Within the City of Fresno, California's fifth largest city, there are museums, galleries, quality lodging and event venues, music and entertainment nightly, national and regional shopping opportunities, as well as countless locally owned stores and restaurants that offer one-of-a-kind experiences. Outside of the metropolitan area, Fresno County offers country farm trails featuring the bountiful harvest of the nation's #1 agricultural county, its majestic lakes and rivers, awe-inspiring foothills and mountain ranges, and a wide variety of unique cultural arts festivals and entertainment opportunities. In summary, Fresno County is a unique blend of urban and rural landscapes with one of the nation's most distinct and diverse mixes of people and ethnicities.

Fresno County remains one of California's best and most livable places. Housing prices are among California's most affordable, and the schools, roads and weather are among the state's best. While the foundation of Fresno County's economy is international agribusiness, the area economy has diversified to include a growing manufacturing base, professional services, and regional headquarters for educational institutions and medical services.

## FRESNO'S RAIL HISTORY - FRESNO'S RAIL FUTURE

The early growth and development of Fresno County is closely linked to the railroad. The City of Fresno itself was established by the Central Pacific Railroad in 1872 and many other communities in Fresno County were similarly established. Railroads were important for the movement of both freight and people. While Amtrak currently provides rail passenger service, the high speed rail system will greatly enhance access from Fresno County and the San Joaquin Valley to the Los Angeles Basin and San Francisco Bay Area. High speed rail can be expected to reinvigorate those communities within which stations are located.

*"...Fresno County is a unique blend of urban and rural landscapes and one of the nation's most distinct and diverse mix of people and ethnicities."*



# SITE OVERVIEW

## SITE DESCRIPTION AND LOCATION

Fresno County has identified a site area on the south edge of the City of Fresno suitable for location of the HMF. The site area is approximately 4 miles long in the north-south direction, bounded on the north by Highway 99; on the south by Adams Avenue; on the east by the Burlington Northern Santa Fe (BNSF) Railroad right-of-way; and, on the west by Cedar Avenue. Between American Avenue and Clayton Avenue the site area includes additional land west of Cedar Avenue to allow Cedar Avenue to be realigned to the west, in order to provide a site that is wider in the east-west direction for location of the HMF in the compact layout that is illustrated by the High Speed Rail Authority in the "Heavy Maintenance Facility Concept Plan" (Drawing TM 5.1-A). **The total site area encompasses approximately 696 acres of land.**

The site area provides the option to develop either a linear layout of the various maintenance functions to be located at the HMF facility, or develop a compact layout of the facility as shown in the "Heavy Maintenance Facility Concept Plan" (Drawing TM 5.1-A). A potential site of approximately 200 acres is shown illustrating specific property parcels that could be acquired between American Avenue and Clayton Avenue to accommodate the compact layout shown in Drawing TM 5.1-A. Additional property both north of American Avenue and south of Clayton may be required to accommodate the "lead track" connecting the HMF to the CHSR mainline tracks. A CHSR Authority owned property of approximately 154 acres in size could be subdivided from those parcels to provide a compact site for the HMF.

### Distance from CHSR Right-of-Way

The site area borders the BNSF right-of-way on the east for its entire length. It is assumed that the Authority will acquire a CHSR right-of-way in the approximately 60 foot wide strip of land adjoining the west side of the BNSF right-of-way. The HMF site would directly adjoin the west side of the CHSR right-of-way, providing direct access to the site.

### HMF Layout Template

The site area can flexibly accommodate the HMF template as illustrated (reflecting the Authority example layout), or Alternative Site Layouts two and three. These options illustrate the ability of the Site Area to provide the Authority's maximum flexibility in siting the HMF to best logistical advantage and with least cost and property impacts. By its proximity to existing industrial areas within the City of Fresno, utilities may be readily extended to any location within the site area.

The northern half of the site area is within the City of Fresno and/or within the City of Fresno Sphere of Influence (planned growth area). Much of the area is zoned for manufacturing and industrial uses (M-3), compatible with a HMF. Since the completion of Highway 41 improvements in 1999 and North Avenue improvements in 2006, the area has attracted considerable industrial and logistics development, but retains substantial capacity for new growth. Additional investment in transportation improvements are planned

for the larger industrial/commercial area in which the site area is located.

The northerly reach of the site area lies to a substantial degree within the footprint of the CHSR mainline alignment, which is anticipated to be elevated to cross over Highway 99 beginning its grade north of Malaga Avenue. **The parcels underneath the elevated section will create underutilized, inaccessible, or otherwise unattractive land for private uses, but which may be utilized for HMF train storage and related operations, minimizing HMF land acquisition.**

### Consistency with Fresno County/City Planning and Zoning

The northern portion of the site area, from Highway 99 south to E. Malaga Avenue, is within the City of Fresno limits. The area is currently planned and zoned for Heavy Industry land uses, and is shown in the Fresno General Plan 2025 as continuing in Heavy Industry land use.

The Fresno "Sphere of Influence" extends south of the city limits approximately one-half mile to American Avenue, incorporating the northern portion of the site area. Should the HMF be located north of American Avenue, existing planning and land use controls are consistent with industrial uses such as the HMF.

Areas within the City of Fresno or its Sphere of Influence are variously zoned M-3 (heavy industrial) or A-E or A-L-20 (agriculture), depending on the extent of development. Agriculture and industry are commonly considered compatible adjacent uses at urban boundaries, as industrial development for the most part does not interfere or conflict with agricultural activities. Agricultural uses are often maintained in areas planned for urban industrial uses pending industrial growth into those expansion areas.

The southern half of the Site Area is adjacent to the City's Sphere of Influence and is currently designated for agricultural use (zoned A-E 20). The Project Site (Option One) proposal is located here at the existing urban boundary, adjacent to industrial uses to the north and east. This location, directly on the HSR alignment where it would likely return to grade, would provide optimum convenience and flexibility for getting HST traffic on and off the mainline.

Should the HSRA locate the site directly south of the City of Fresno and parallel to the at-grade portion of the HST, as shown in Option Two, a general plan amendment and rezone to M-3 by Fresno County would be required to entitle the property for use as a HMF. The M-3 Heavy Industrial District is the broadest classification of industrial zoning, and is consistent with similarly zoned areas in the Site Area in both the incorporated and unincorporated areas. Zoning to M-3 would fully entitle the site for use as a HMF in the unincorporated area. Following entitlement, a ministerial process of site plan review and building permits would allow progression to construction.

The southern portion of the site area outside the Sphere of Influence is currently in agricultural use, although no portion of the site area is included under Williamson Act agricultural land use classification.

# SITE OVERVIEW continued

## UTILITIES

The site area has all existing utilities necessary to serve the HMF. All utility services exist in the industrial zoned area of Fresno on the north end of the site area, and can easily be extended further to the south as required to serve the HMF depending upon the final location of the site.

### *Electric Power and Natural Gas*

Pacific Gas & Electric will provide electricity and natural gas to all portions of the site area. PG&E has transmission and substation facilities nearby and can work with the Authority to construct a new electrical substation on site. The Fresno Team has met with PG&E representatives who have indicated that PG&E will provide services at the capacity desired, with allowances that are credited against construction costs based upon their anticipated revenue generated from the HMF.

### *Domestic Water, Sanitary Sewer and Storm Water Sewer Collection*

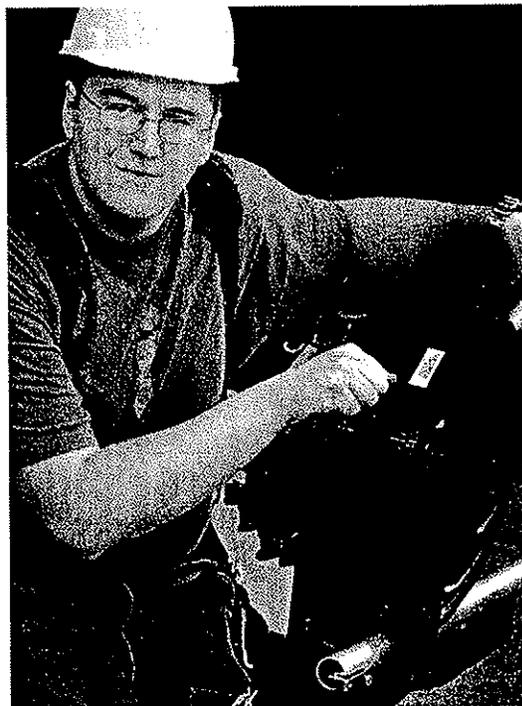
The City of Fresno can provide domestic water and sanitary sewer service to the final selected HMF site, regardless of its location or configuration in the site area. It is anticipated that storm water would be retained on the HMF site. Based upon Fresno County's geologic and climate conditions, two 3-acre storm drainage basins would be sufficient to support the site. If the HMF is located north of American Avenue, the Fresno Metropolitan Flood Control District has a planned off-site drainage pond near the site area that can be utilized for off-site storm drainage.

### *Refuse Removal*

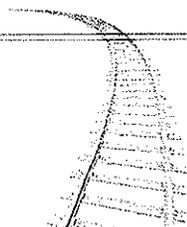
Refuse removal in the Fresno County portion would be provided by a private hauler contracted with Fresno County. If the HMF is located within the Fresno City limits, the City of Fresno would provide refuse removal. The City of Fresno is currently the top recycling city in the nation, with a current landfill diversion rate of 72 percent. The City can work with HMF managers to maximize recycling procedures at the facility.

### *Communications*

AT&T will provide communications service to the HMF within the site area. AT&T will provide whatever infrastructure is needed to meet the HMF's communication needs. Any costs to upgrade off-site infrastructure would be expected to be borne by AT&T because they have existing facilities already providing service throughout the site area.

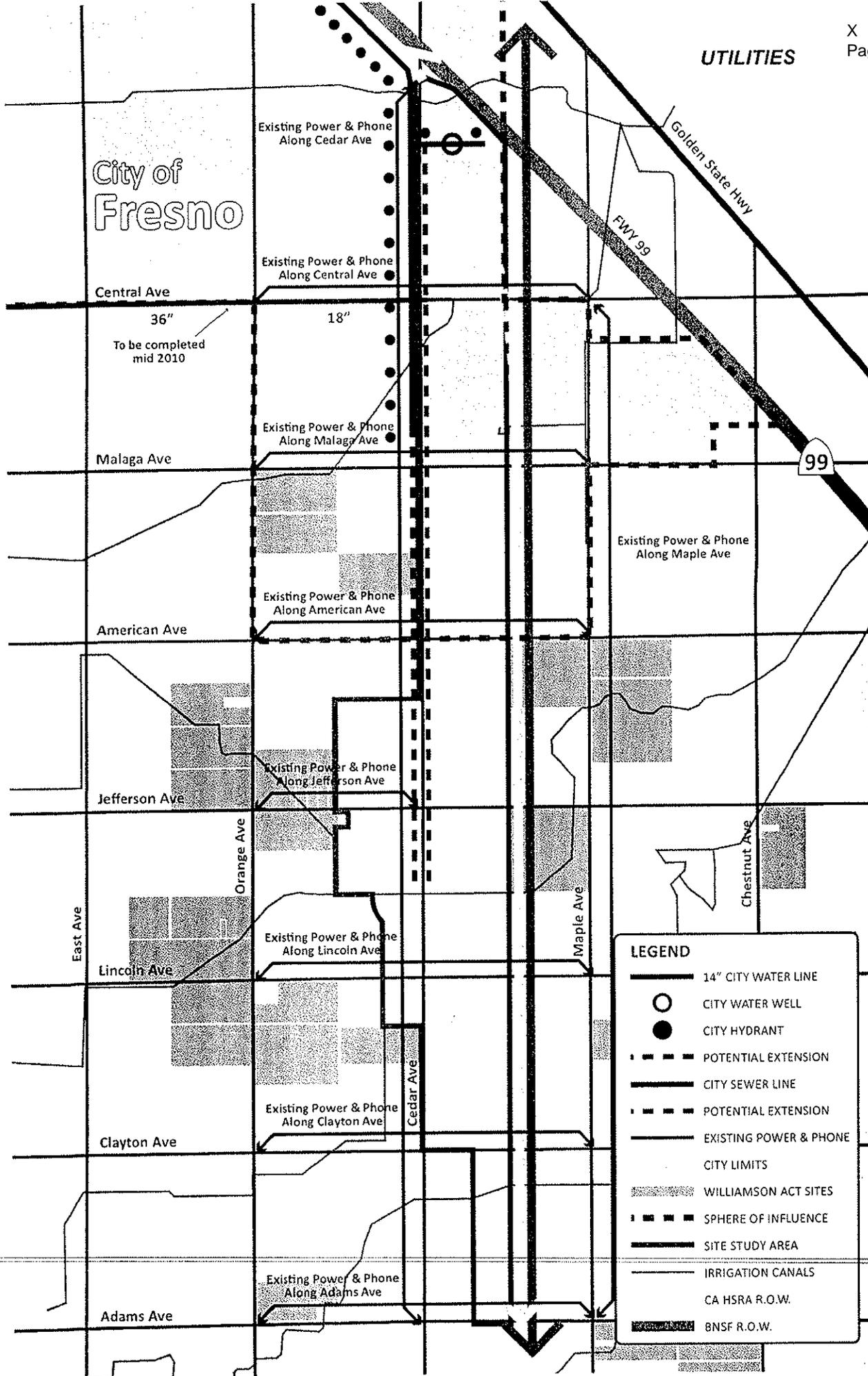


*"The HMF site would directly adjoin the west side of the CHSR right-of-way, providing direct access to the site."*



UTILITIES

City of  
Fresno



**LEGEND**

- 14" CITY WATER LINE
- CITY WATER WELL
- CITY HYDRANT
- POTENTIAL EXTENSION
- CITY SEWER LINE
- POTENTIAL EXTENSION
- EXISTING POWER & PHONE
- CITY LIMITS
- WILLIAMSON ACT SITES
- SPHERE OF INFLUENCE
- SITE STUDY AREA
- IRRIGATION CANALS
- CA HSRA R.O.W.
- BNSF R.O.W.

# SITE OVERVIEW continued

## CONSTRUCTABILITY

Among the site area's best features is its ability to support construction. **The site is broad, relatively flat with good soils. There is ample laydown area and phasing locations. There are few structures to demolish and even fewer natural impediments. The street network is robust and the site is directly within and nearby Fresno's City limits, meaning everything from labor to materials will be quite accessible.** The following describes in more detail the site's construction attributes:

### Topography

**The entire site is virtually flat minimizing fill or cut areas, presenting an excellent building surface.** The overall natural elevation grade differential of the site area is approximately 10 feet, derived from topographic maps from the US Geological Survey. Starting along the BNSF right-of-way, the site's northern most area is approximately 286 feet above sea level. The site area rises four feet in over 1.5 miles to a 290 foot elevation, just south of Lincoln Avenue. It then descends 5 feet in approximately 1.5 miles, just north of Adams Avenue, to a 285 foot elevation at Adams Avenue.

There is a gentle east to west cross slope of approximately 3 feet in a 0.25 mile distance at the northern most end of the site area. The widest part of the site area between Lincoln Avenue and Washington Avenue has a cross slope of 5 feet within the 0.5 miles width. The cross slope at the southern most end is relatively flat along the 0.25 miles of Adams Avenue. The site area has long been utilized for agriculture purposes. The long term agricultural cultivation of this area has left the terrain of the land in a nearly level plane, even in the areas that have transitioned into industrial uses.

### Soil Conditions

**Soil conditions throughout the general area and specifically throughout the site area are considered excellent. The high-strength, non-expansive soils are very conducive to the type of heavy construction anticipated.** Without a specific geotechnical investigation the following is based on what would be typically anticipated for a construction site in the Fresno County area. The general soil conditions of the San Joaquin Valley floor in this area of Fresno County consist of predominantly silts and sands with little to some clay. It is anticipated that the surface soil layer will be of silt or sandy silt and will be relatively easy to work with throughout the project site.

Typically, the existing native soils in the Fresno County area, when free of organic materials, are suitable to be reused as engineered fill for building construction and site improvements. The bearing capacity usually seen with the firm native soils or properly compacted engineer fill may allow the proposed structures to be supported

on spread footing; for a lower building and site improvement costs. The nature of the existing silt or sandy silt soils allows for quick percolation of

standing water into the ground. This provides a relatively dry accessible site year around facilitating continuous construction with little or no maintenance.

### Highway Accessibility

There is access along the full length of the site area with multiple streets. Cedar Avenue provides North and South access, with Central Avenue, American Avenue and Adams Avenue providing the major access across the site in the East / West Direction. There is easy movement of construction materials, equipment and work force to the proposed construction site with the access to Highway 99 from Cedar Avenue, Central Avenue, American Avenue, and Adams Avenue and access to Highway 41 from Central Avenue, American Avenue and Adams Avenue. There are no road improvements or barriers that would limit or prohibit access along the full length or width of the site area. There are no topographical conditions or site improvements that would severely restrict or limit movement and utilization of the site area for the necessary temporary facilities during construction.

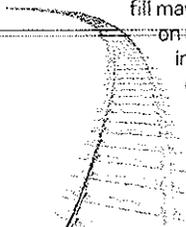
### Other On-Site Conditions

Among the most important construction site issues is the water table, which can cause major disruption to construction activities and ongoing site maintenance. **The Fresno County site has a low water table that will present no impediments to construction or facility maintenance.** Regional water table elevation maps prepared by the California Department of Water Resources indicate the groundwater level to be approximately 238 feet elevation, which places the water table 55 feet below the surface.

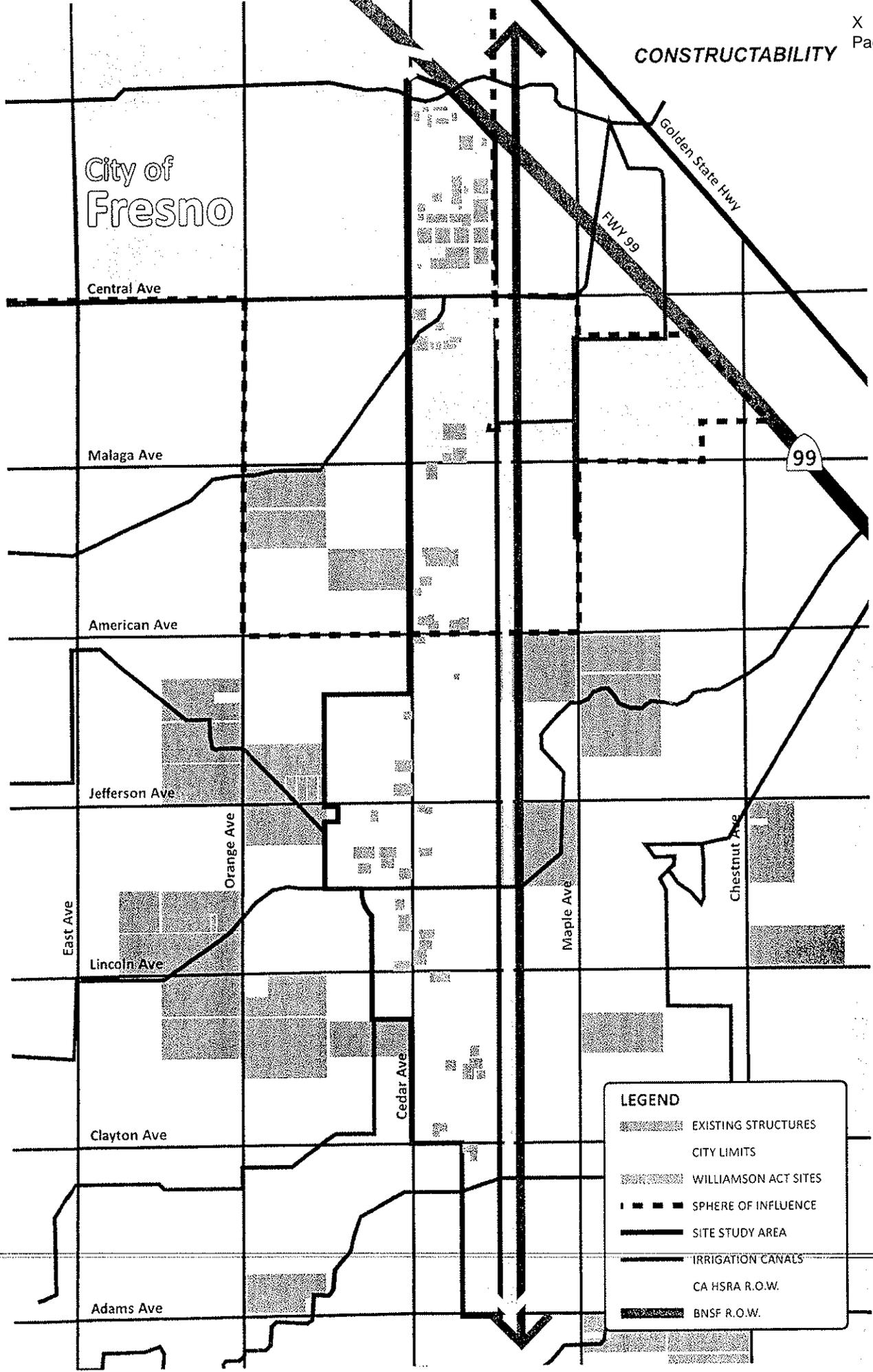
### Irrigation Canals

**There are no natural rivers or waterways within the site area, and with only three minor irrigation canals there will be minimal impact to construction.** Their locations are limited to three crossing all in the east / west direction. The Central Canal and Washington Colony Canal crosses the northern section of the site area along Central Avenue.

There is a branch of the Washington Colony Canal that again crosses the central area of the site area at the midway point between Jefferson and Washington Ave. On the southern portion of the site area the north branch of the Oleander Canal crosses south of Clayton Ave and north of Adams Avenue. The irrigation canals will pose no significant barrier due to their location and distance between the site crossing. Only one canal would be affected with the compact layout of the "Heavy Maintenance Facility Concept Plan" (Drawing TM 5.1). Again, only one of the canals would be affected by the linear layout of the "Alternative Concept Plans". It is not uncommon to underground and/or reroute local irrigation canals due to development in the Fresno County area.



# CONSTRUCTABILITY



## **SITE OVERVIEW** continued

### **DISPLACEMENTS**

Fresno County proposes a flexible 696 acre site area from which the Authority can select its HMF site. This provides the Authority with an exceptional level of flexibility in how it develops the site, but it also gives the Authority the ability to minimize impacts to landowners. Another feature of the Fresno County site area is that in all, there are only 76 parcels encompassing the 696 acres. Also of note, none of the parcels are in the Williamson Act. We anticipate no problems in negotiating land acquisitions.

The following is a brief summary of the overall site area:

**Total Site Area: 696 acres & 76 parcels**  
27 parcels > 10 acres (average size 20 acres)  
49 parcels < 10 acres (average size 3 acres)

**Parcels in Williamson Act or Farmland Security Zone**  
Land Conservation Contracts: 0

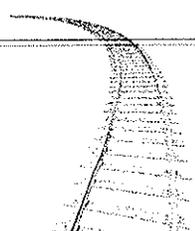
#### **Prime Farmland within Site Area:**

- State Route 99 to Central Avenue (81 acres): None
- Central Avenue to American Avenue (150 acres): Mixture of Prime Farmland, Urban & Built-Up Areas, and Semi-Ag & Rural Commercial.
- American Avenue to Adams Avenue (465 acres): Predominantly Prime Farmland

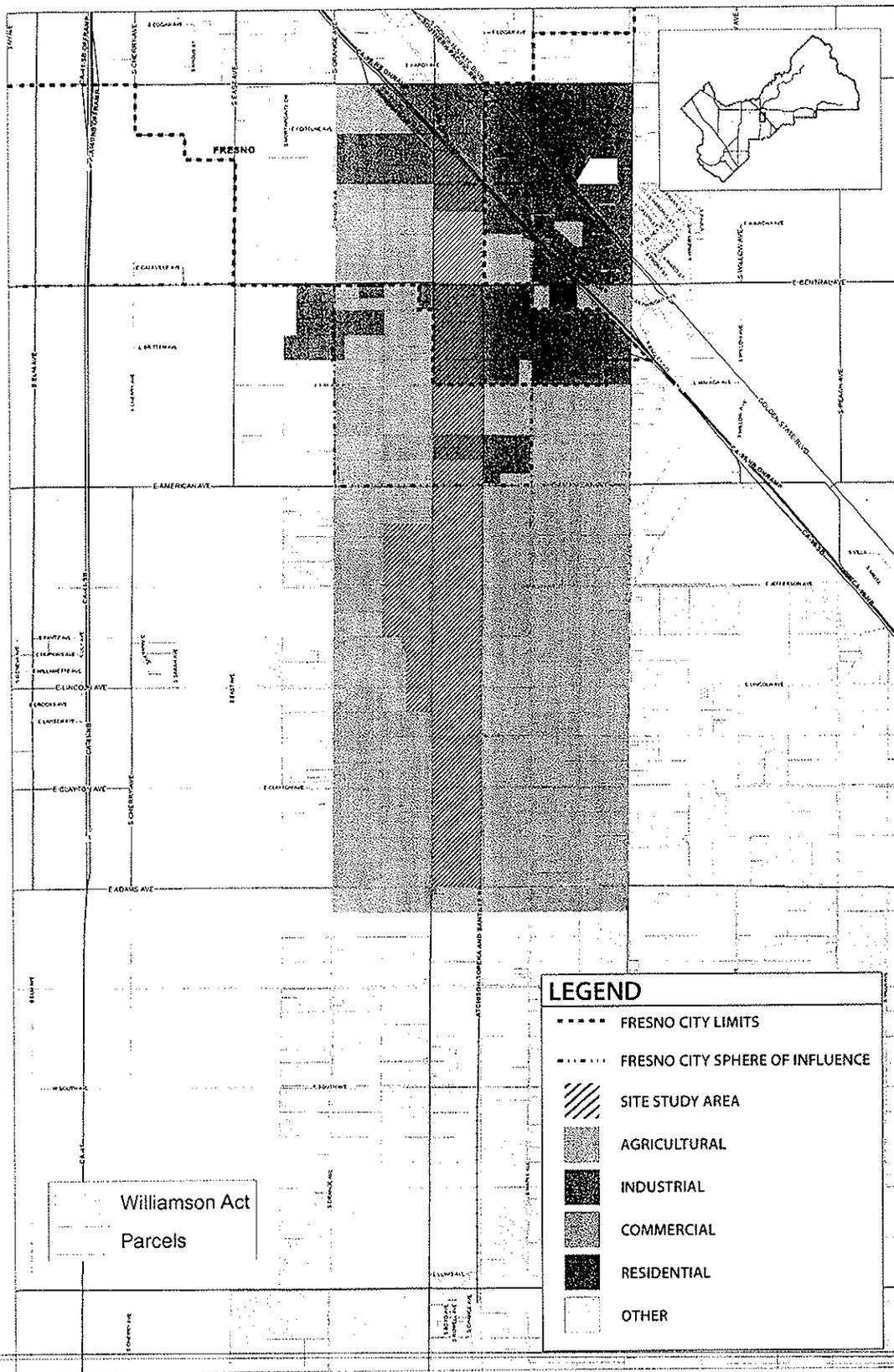
The following is a brief summary of the identified Site Alternative 1

- 18 acres (2 parcels) M-3 (Heavy Manufacturing)
- 418 acres A-E 20 (Agriculture 20-acre minimum)
  - 165 acres permanent crops (vines / orchard)
  - Remainder in row crops, pasture, or open
- Up to 29 potentially-affected residences

*"...in all, there are only 76 parcels encompassing the 696 acres... none of the parcels are in the Williamson Act."*



ALLOCATION AND BOUNDARIES



# SITE OVERVIEW continued

## TRAFFIC AND TRANSPORTATION

### Highway Access

The site area has excellent access. Freeway 99 and Highway 41 are nearby to serve as the backbone for access to the HMF. Arterial streets such as Cedar Avenue, North Avenue, Central Avenue, American Avenue, and Adams Avenue all have direct access to these state highways. A portion of Cedar Avenue could be realigned at City/County expense if more space is needed for the HMF between Cedar Avenue and CHSR and BNSF mainlines.

Sufficient local roadway infrastructure is already in place. Based upon 2030 traffic forecasts, a preliminary analysis of average daily trips (ADT) finds that the HMF will not reduce the Level of Service (LOS) of any of the roadways or intersections in the vicinity. All roadways and intersections remain at LOS C or better, except for Cedar Avenue, which is projected to be at LOS D with or without the HMF.

### Truck Routes

Cedar Avenue is a designated truck route from Highway 99 southward. Central Avenue is a future designated truck route from Highway 41 to Highway 99. Freeway 99 has interchanges at Cedar Avenue, Central Avenue, American Avenue, and Adams Avenue. The American Avenue interchange is programmed and funded for upgrade using local Measure C dollars. Highway 41 has intersections at Central Avenue, American Avenue and Adams Avenue. The City and County have dedicated funding sources to adequately maintain these roadways over time.

### Over/Under Crossings

Along the site area, street over/under crossings are planned with the CHSR and BNSF mainlines at Central Avenue, American Avenue, Lincoln Avenue, and Adams Avenue. All other roadway crossing in the site area would be closed, leaving room to locate an HMF within the site area in a number of locations without disrupting local traffic patterns.

### Public Transportation/Vanpools and Fixed Route Service

Fresno County is committed to working with the Authority to establish Commuter Vanpools for the HMF. The Fresno County 2006 Measure "C" Extension Expenditure Plan, passed by voters in November 2006, provides funds for a Commuter Vanpool Program. The program is designed to get commuters to their destinations safely, improve air quality, and provide a cost-effective alternative to the single occupant vehicle. The Commuter Vanpool Program is open to both public and private industry, as well as potential public/private partnerships. Funds are available for a variety of vanpool incentives including monthly lease subsidies, start-up costs such as medical exams for drivers, emergency ride-home program, driver

incentives, parking permits, and more. In order to qualify there must be at least six riders and one driver. The vanpools must originate in Fresno County and typically must operate at least five days a week.

In addition, Fresno Area Express (FAX) provides fixed route service throughout the Fresno-Clovis Metropolitan Area. Three routes - routes 32, 38, and 41 - currently provide service near the proposed site. FAX stands ready to make any necessary adjustments, including additional peak period service, to one or more of these routes in order to provide the best transit service possible.

### Parts/Materials Shipping

The site area is located in close proximity to the BNSF and UP freight mainlines. The site area's location makes it feasible to construct an interchange track between either or both of these railroads directly with the HMF yard to bring heavy equipment and parts to the HMF. UPS Freight and Fed Ex Freight both have shipping/courier facilities within 1.5 miles of the site area for smaller shipments.

*"Fresno International Airport is the region's largest and only international airport..."*

### International Airport Services

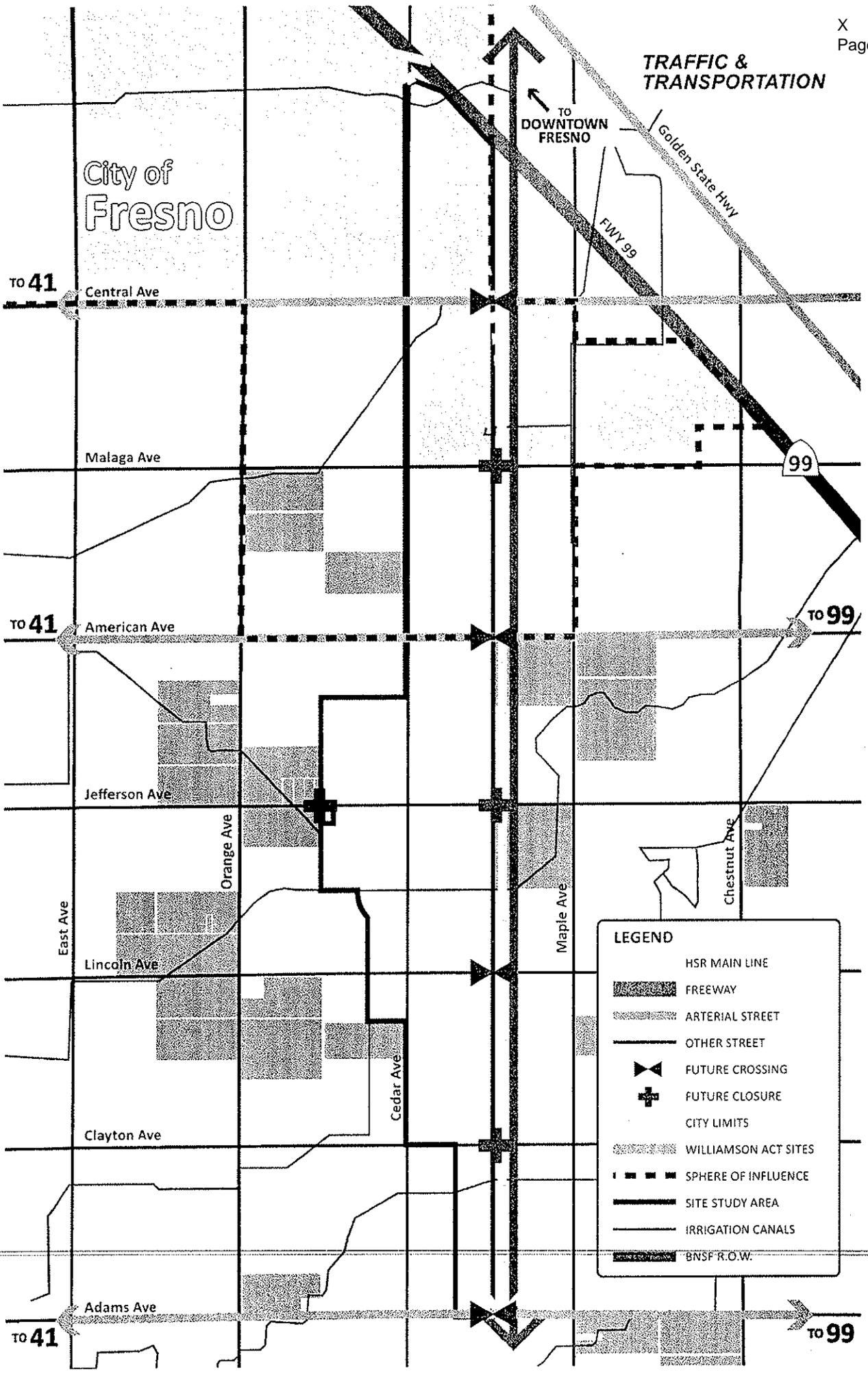
Fresno International Airport is the region's largest and only international airport, which is a critical asset when considering that the HMF and the adjacent test track will be a major business destination for the global transportation market. The City of Fresno has invested \$66.4 million in the Fresno Yosemite International Airport over the last two years to expand and upgrade the facility, including \$16 million in solar energy, making it the largest solar installation at any airport in the United States.

General Aviation facilities at the Airport are located primarily west of the terminal on approximately 13 acres.

The General Aviation area consists of private and corporate aircraft hangar facilities, as well as aviation-related businesses offering fuel services, flight training, flight schools, aircraft sales and rentals, aircraft storage and maintenance, avionics services, charters and hangar rentals.



### TRAFFIC & TRANSPORTATION



**LEGEND**

- HSR MAIN LINE
- FREEWAY
- ARTERIAL STREET
- OTHER STREET
- FUTURE CROSSING
- FUTURE CLOSURE
- CITY LIMITS
- WILLIAMSON ACT SITES
- SPHERE OF INFLUENCE
- SITE STUDY AREA
- IRRIGATION CANALS
- BNSF R.O.W.

## SITE OVERVIEW continued

### ENVIRONMENTAL

#### Underground Storage Tanks

Fresno Works has completed Phase One and Geological/Geotechnical Report for the portion of the site area within Fresno County. The Fresno Team prepared a Phase I Environmental Site Assessment Report for the portion of the site area within Fresno County. The Report identified eleven "existing or potentially existing" locations of underground storage tanks. Because this is a preliminary report, it is not certain whether there actually are 8 underground storage tanks or whether any of them would require remediation. The Report also identified the two sites as "potential locations" for use of hazardous materials and/or petroleum products. Again, it is not certain at this time whether any remediation would be required.

Our certified biologists have conducted a preliminary review of the site area and found **no evidence that sensitive species are present. No evidence was found regarding biological issues** that would create unusual or problematic project permitting or unusual mitigation requirements.

As noted above, the site area **does not contain any Williamson Act contracts**. If the HMF is constructed in the northern portion of the site area, no farmland would be displaced. If it is constructed in the southern portion of the site area then the amount of farmland displaced would be equal to the size of the HMF.

There are **no wetlands** within the site area.

#### Potential Hazards

Earthquakes and flooding have a very low chance of occurring at the Fresno County site area. An Alquist Priolo Map is not even produced for Fresno County because earthquake potential is so low.

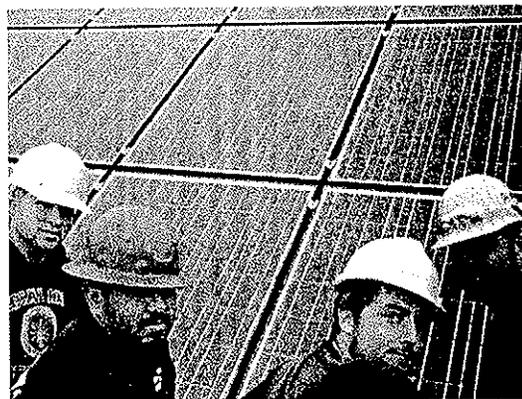
According to California Geologic Survey data, there have been no recorded earthquakes with a magnitude 5.5 or greater within 30 miles of the site since 1800.

The site area is not within a FEMA Flood Hazard Zone, with the very minor exception of an existing irrigation canal that runs along Central Avenue. The AE zone (100-year flood zone) is limited to the channel of the canal only.

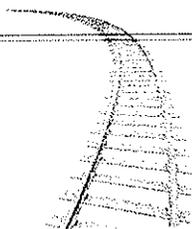
#### Entitlements

The site area is entirely within Fresno County, partially within the City of Fresno and Fresno's Sphere of Influence. Both the City and County are fully committed to working cooperatively to site the HMF in any portion of the site area. The City of Fresno portion is already zoned for Heavy Industrial use; the HMF would be an allowed use in that zone.

The County of Fresno portion is currently zoned for Agricultural use. However, Fresno County is open to initiating, at its own expense, a general plan amendment and rezoning process to rezone the Heavy Industrial use for any County of Fresno portion of the site area selected by the Authority for the HMF, assuming such a process is consistent with the Authority's needs and processes.

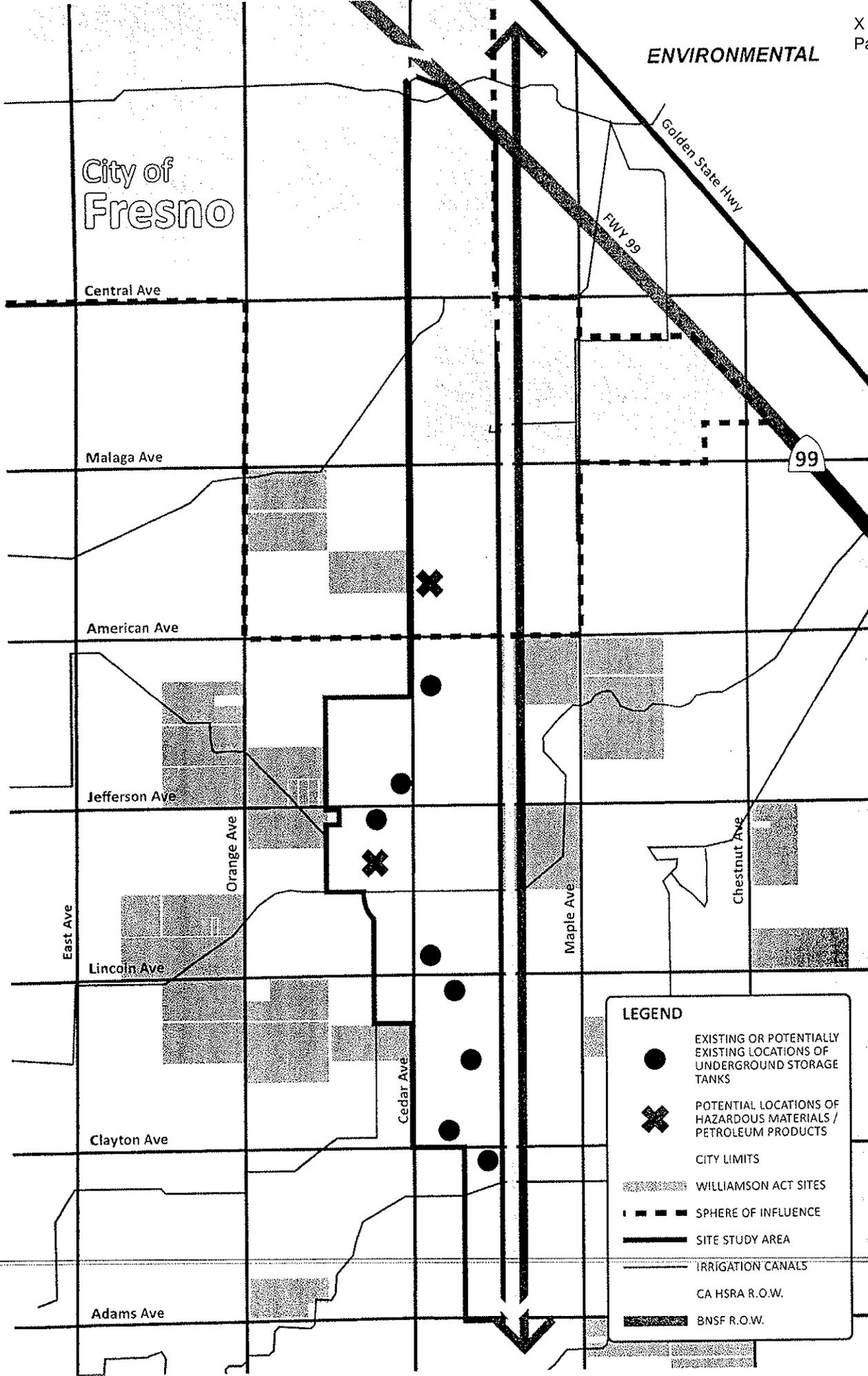


*"Fresno County is prepared to assist the Authority in expediting the environmental review process for the site in accordance with CEQA/NEPA... the site poses no significant known issues that may hinder development of the HMF, and there is wide support for the location within the community."*



ENVIRONMENTAL

City of  
Fresno



**LEGEND**

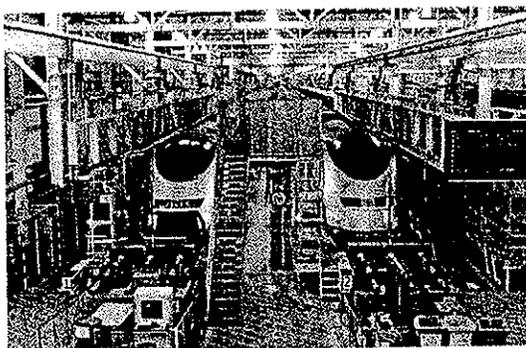
- EXISTING OR POTENTIALLY EXISTING LOCATIONS OF UNDERGROUND STORAGE TANKS
- ✕ POTENTIAL LOCATIONS OF HAZARDOUS MATERIALS / PETROLEUM PRODUCTS
- CITY LIMITS
- ▨ WILLIAMSON ACT SITES
- - - SPHERE OF INFLUENCE
- SITE STUDY AREA
- IRRIGATION CANALS
- CA HSRA R.O.W.
- BNSF R.O.W.

# SITE OVERVIEW continued

## HEAVY MAINTENANCE FACILITY LAYOUT

Fresno County has identified a site area and began a preliminary Alternative Analysis of the HMF, which consists of developing and analyzing potential conceptual alternatives which can be used to support preliminary engineering, develop capital and operating costs, and environmental analysis. Utilizing the Technical Memorandums "Alternative Analysis for Siting Maintenance Facilities" along with "Terminal and Heavy Maintenance Facility Guidelines," Fresno County has initiated the process to assist the regional team in conducting an AA for the Fresno County HMF. The development of a site area, rather than a stand alone site, allows for development of multiple feasible and practical maintenance facility site alternatives. To show the flexibility of the unconstrained proposed HMF site area, our team has developed three alternatives (depicted and discussed in the pages that follow) that demonstrate the capability to accommodate the HMF guidelines and criteria.

- Alternative Layout One "Template"
- Alternative Layout Two
- Alternative Layout Three



Flexibility of the site area to provide for a number of alternative layouts is key to the Fresno Works Expression of Interest. These alternatives not only accommodate the guidelines and criteria that were derived from a review of best practices and programs used on similar high-speed train systems around the world, but can accommodate modifications, expansion, and variations to the mainline track alignment, whether horizontal or vertical. In addition, the site area and alternative layouts can accommodate an increase of estimated fleet size, additional requisite track, shop buildings, parking requirements, traffic and pedestrian access/egress modification, and varying right-of-way needs.

### Alignment

The site area is immediately adjacent on the west side of the existing BNSF Right of Way. Based on discussions with engineers at URS and Arup who are conducting CHSR ROW analyses From Fresno to Palmdale, Fresno County understands that the CHSR ROW from Fresno south will follow a path adjacent and parallel to the west of the existing BNSF ROW. The proposed CHSR ROW will run



adjacent to and parallel to the Fresno site from Malaga Avenue south along the BNSF ROW for 12 miles before crossing over to the east side of the BNSF ROW. From Malaga north, the CHSR is elevated and cuts over the site area as it bends to the east on its approach to Downtown Fresno. Fresno Works believes the site area's alignment with the CHSR ROW provides the Authority with an ideal location in terms of adjacency with the CHSR mainline, proximity to the Downtown Fresno, and a northern anchor for a 110 mile HSR Test Track. Moreover, it is our belief the Authority can utilize land it will already have acquired for the elevated section that is contained within the site area for the HMF. This site utilization strategy would save the Authority millions of dollars in land acquisition, infrastructure and environmental reviews, while eliminating the need to rezone one acre of agricultural land.

Connectivity from the site to the local roads and highway network are also identified in the alternative layouts, including not only the access and egress locations, but also the required grade separation requirements of major arterial streets and the impacts of these improvements. Based on the local traffic circulation patterns within the area, various alternative concepts can be accommodated in a feasible and practical manner, while still allowing for a wide variation of site modifications as future development of the system occurs.

*"...provides the Authority with an ideal location in terms of adjacency with the CHSR mainline, proximity to the Downtown Fresno, and a northern anchor for a 110 mile HSR Test Track."*



## SITE OVERVIEW continued

### *True Scale Alternative Development*

In order to accurately identify proposed footprints of the three alternative layouts (site plans) the drawings were developed utilizing the computer aided design drawing (CADD) program MicroStation. This is consistent with the CHSR CADD program and utilizes the same global origin for consistency with the mainline track alignment. The concept plans that are presented in the Terminal and Heavy Maintenance Facility Guidelines are not to scale, so careful preliminary engineering took place to scale the elements of track quantity & locations, shop buildings, parking lots, and right-of-way limits. The three alternative layouts were designed per the CHSR criteria, rail standards, and the TM 5.1-A concept plan in the Terminal and Heavy Maintenance Facility Guidelines. This attention to detail provides for realistic site evaluation and accurate right-of-way impacts to assure feasibility and understanding of the impacted footprint.

### *Other Site Evaluation Elements*

In addition to overall review and verification, evaluation of specific site items is required to provide a more complete and accurate development of alternatives. These specific items include the following:

### *Earthwork Evaluation*

Site specific terrain and earthwork are essential in developing site alternatives. The costs of earthwork can account for a large percent of the construction subtotal. Developing alternatives that minimize earthwork volumes is an iterative process, which has been initiated with these conceptual alternative layouts that follow and will be further refined by the regional team. The vertical alignment can vary significantly based on the technology of train sets and their required design criteria, however site area and multiple alternative layouts provide for continuity/feasibility regardless of train set technology.

### *Right-of-way Identification*

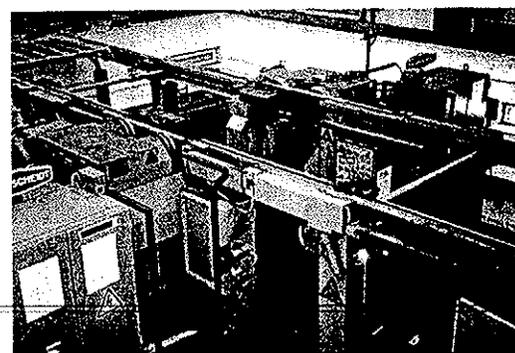
Due to the limited identification of right-of-way from previous studies, general assumptions were required for the development of proposed right-of-way utilizing Terminal and Heavy Maintenance Facility Guidelines. The following right-of-way elements have been identified in true scale to evaluate site impacts in greater detail assuring feasibility of the site and the Alternative Layouts we have developed.

- BNSF Right-of-way
- CHSR Right-of-way
- Permanent Surface, Underground and Aerial Easements
- Drainage Easements
- Roadway Easements
- Temporary Construction Easements

### *Environmental Impacts & Mitigation*

Previous studies account for general environmental mitigation. In order to verify specific mitigation measures, the alternative layouts will be evaluated in greater detail and the mitigation costs identified. Several issues to be considered include:

- Traffic
- Noise
- Air Quality
- Light
- Visual Impacts



# SITE OVERVIEW continued

## ALTERNATIVE LAYOUT - ONE "TEMPLATE"

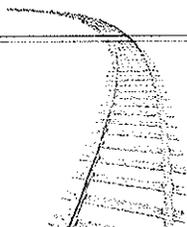
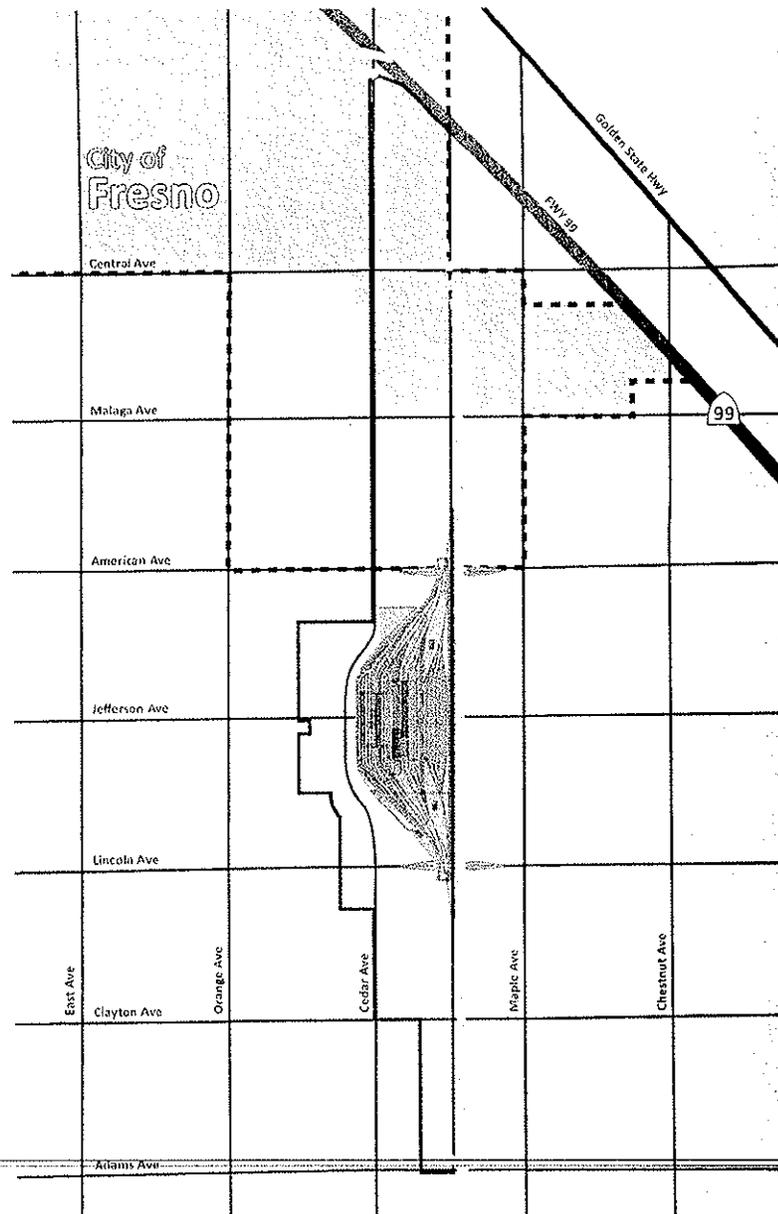
The "Template" Alternative utilizes the Terminal and Heavy Maintenance Facility Guidelines and Concept Plan in true scale. No other modifications were made to the site footprint.

This alternative requires the relocation of Cedar Avenue to accommodate the required width. Grade separated arterials are proposed for both American and Lincoln Avenue while Jefferson Avenue will be closed to through traffic at the BNSF right-of-way. Analysis of traffic impacts were evaluated and based on current and future traffic volumes, the level of service at surrounding intersections were determined to have no adverse affects.

This alternative as shown can accommodate modifications, expansion, and variations in relation to the mainline CHSR alignment. In addition it can shift to the north, south, or

west to provide for additional storage and expandability as details are determined from the preliminary engineering site that is on-going. The only physical constraint is the CHSR alignment and BNSF right-of-way to the east.

Right-of-way limits were determined and consideration of the remnant parcels which have the opportunity to provide future support services and industrial development to support the HMF were discussed previously.



**ALTERNATIVE LAYOUT ONE**

**HIGH SPEED RAIL  
HEAVY MAINTENANCE FACILITY**

- SPHERE OF INFLUENCE
- SITE STUDY AREA
- CA HSRA R.O.W.
- BNSF R.O.W.

**BUILDINGS**

- ① SUPPORT SHOPS
- ② STORES
- ③ TRUCK/WHEEL SHOP
- ④ HEAVY METAL SHOP

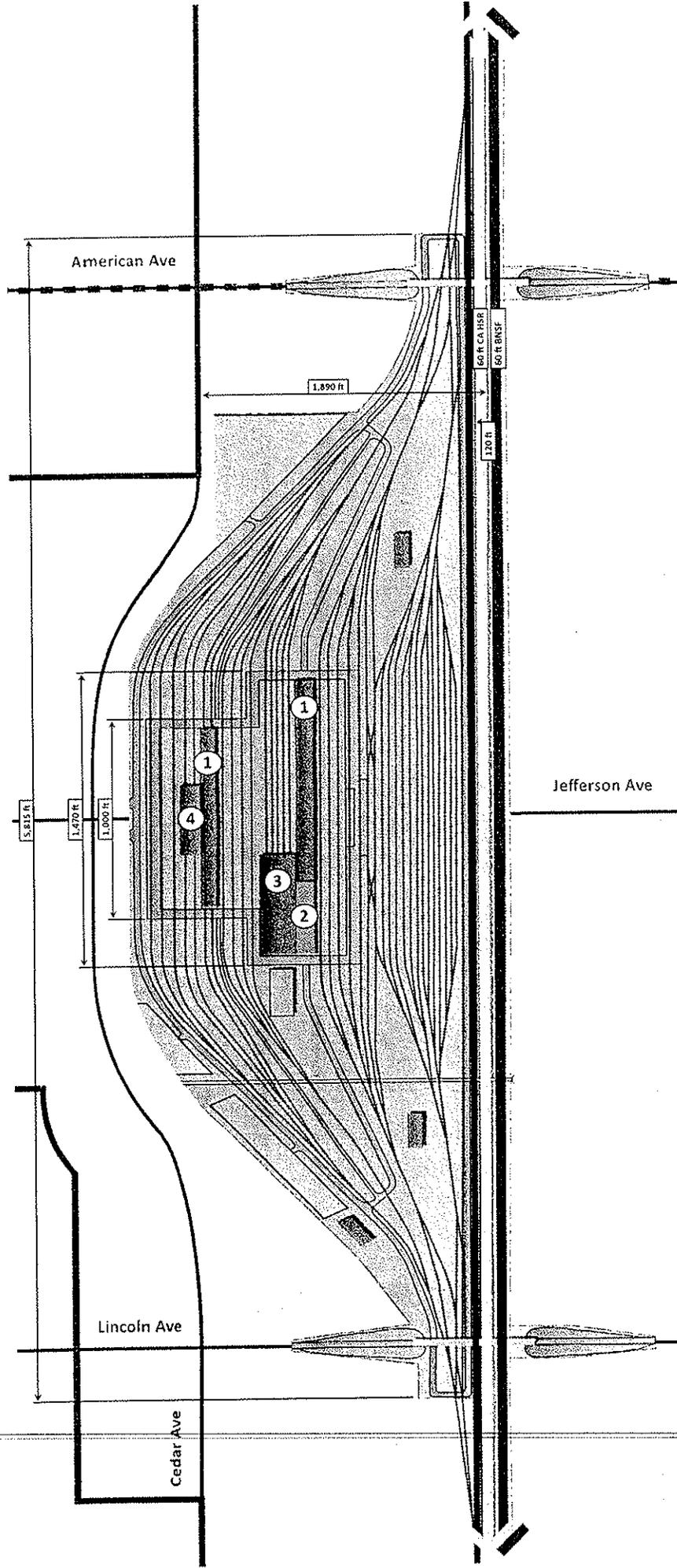
- YARD RIGHT-OF-WAY
- PARKING LOT
- BUILDING
- ++++ RAIL LINE
- SUBSTATION
- EMERGENCY GENERATOR

**SHOP TRACKS**

- S1 WHEEL TRUE
- S2 - S4 LEVEL III PERIODIC INSPECTION & SERVICES RUNNING REPAIR
- S5 - S9 COMPONENT CHANGE-OUTS
- S10 - S13 LEVEL IV - OVERHAUL
- S14 - S15 HEAVY REPAIR STORAGE
- S16 - S17 LEVEL V - HEAVY REPAIR
- S18 - S19 PAINT

**YARD TRACKS**

- Y1 - Y4 SPARE RATIO - FLEET
- Y5 - Y6 DAILY PRE-TRIP R/R LEVEL I AND II
- Y7 - Y8 SWITCHING TRACKS
- Y9 - Y11 MANIPULATION - LAYUP - DAILY
- Y12 - Y13 EIC ON PLATFORM



# SITE OVERVIEW continued

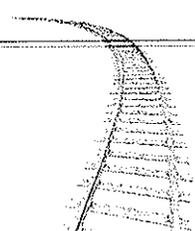
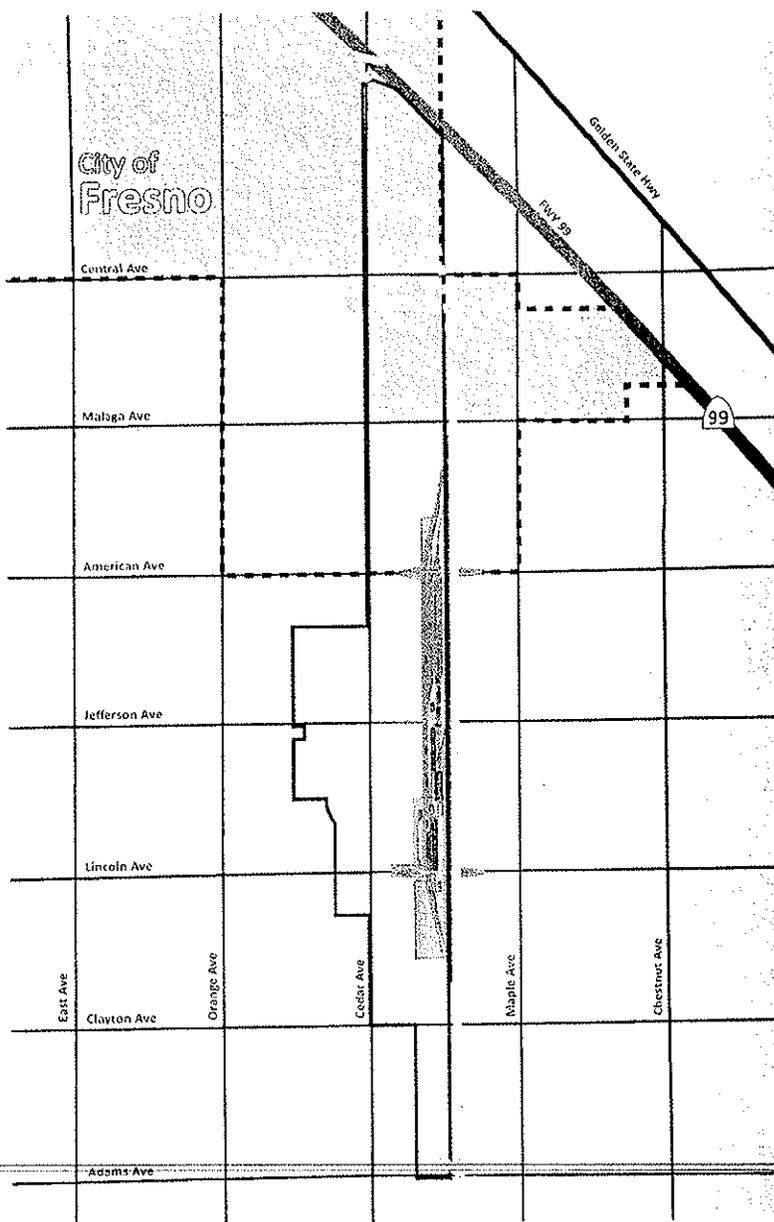
## ALTERNATIVE LAYOUT - TWO

Alternative Layout Two utilizes a similar location as the "Template" Alternative Layout described above; however modifications have been made to eliminate right-of-way impacts. The alternative is a more linear version than the wider "Template" Alternative Layout One, but still maintains all the same elements of track quantity and lengths, shop buildings footage, and parking lot space. This alternative does not require the relocation of Cedar Avenue due to the narrowed width. Similarly, grade separated arterials are proposed for both American and Lincoln Avenue while Jefferson Avenue will be closed to through traffic at the BNSF right-of-way. Analysis of traffic impacts are the same as the "Template" Alternative Layout previously described, which were determined to have no adverse affects.

This alternative allows for significant modifications, expansion, and variations in relation to the mainline CHSR alignment without affecting its feasibility. This alternative can also shift to the north, south, or west to provide

for additional storage and expandability as details are determined from the preliminary engineering site that is on-going. Similarly, the only physical constraint is the CHSR alignment and BNSF right-of-way to the east.

Right-of-way impacts are very insignificant as the narrow footprint does not require full property takes, but allows partial takes along the entire site footprint. This alternative provides the greatest opportunity to accommodate future support services and industrial development to support the HMF as discussed previously.



**ALTERNATIVE LAYOUT TWO**

**HIGH SPEED RAIL  
HEAVY MAINTENANCE FACILITY**

- SPHERE OF INFLUENCE
- SITE STUDY AREA
- - - - - CA HSRA R.O.W.
- ▬ BNSF R.O.W.

**BUILDINGS**

- ① SUPPORT SHOPS
- ② STORES
- ③ TRUCK/WHEEL SHOP
- ④ HEAVY METAL SHOP

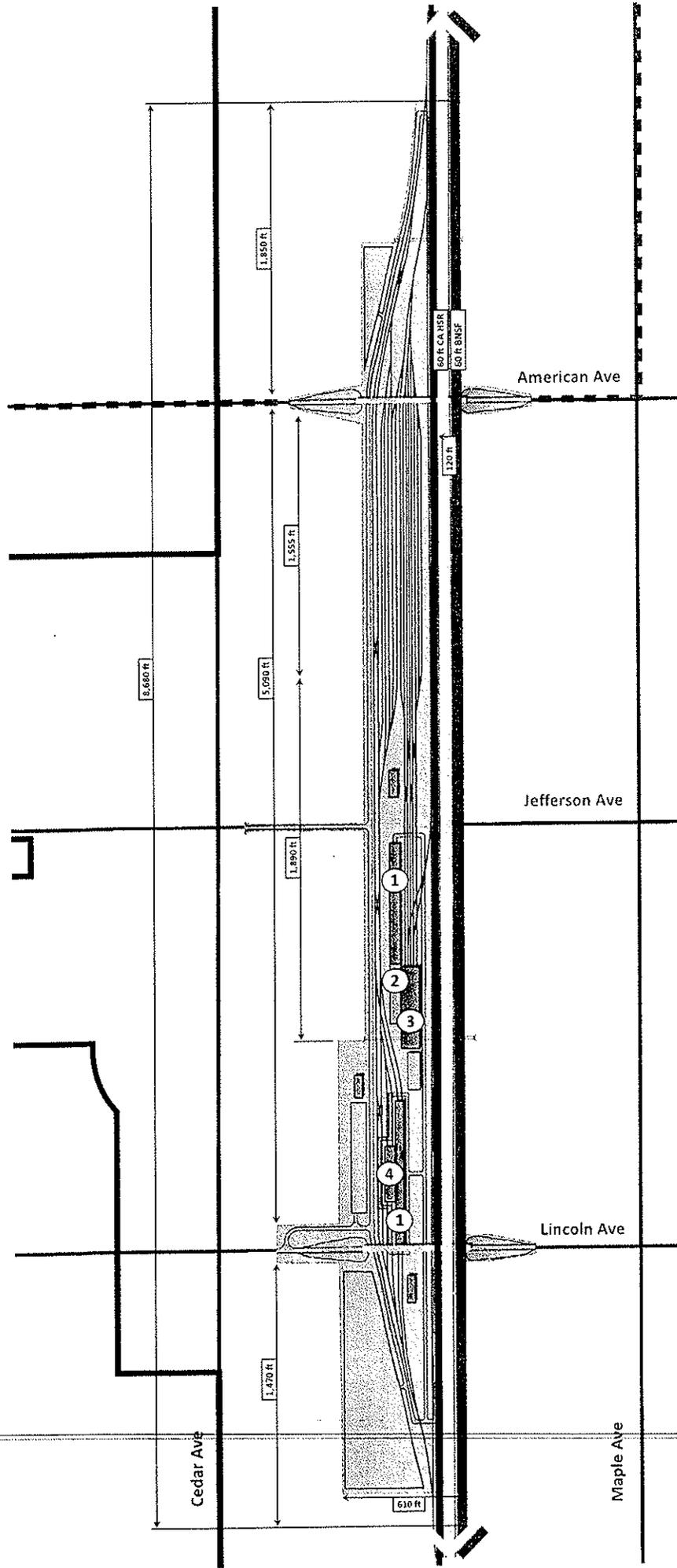
- YARD RIGHT-OF-WAY
- PARKING LOT
- BUILDING
- ++++ RAIL LINE
- SUBSTATION
- EMERGENCY GENERATOR

**SHOP TRACKS**

- S1 WHEEL TRUE
- S2-S4 LEVEL III PERIODIC INSPECTION & SERVICES RUNNING REPAIR
- S5-S9 COMPONENT CHANGE-OUTS
- S10-S13 LEVEL IV - OVERHAUL
- S14-S15 HEAVY REPAIR STORAGE
- S16-S17 LEVEL V - HEAVY REPAIR
- S18-S19 PAINT

**YARD TRACKS**

- Y1-Y4 SPARE RATIO - FLEET
- Y5-Y6 DAILY PRE-TRIP R/R LEVEL I AND II
- Y7-Y8 SWITCHING TRACKS
- Y9-Y13 MANIPULATION - LAYUP - DAILY
- Y12-Y13 EIC ON PLATFORM



# SITE OVERVIEW continued

## ALTERNATIVE LAYOUT - THREE

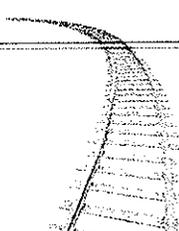
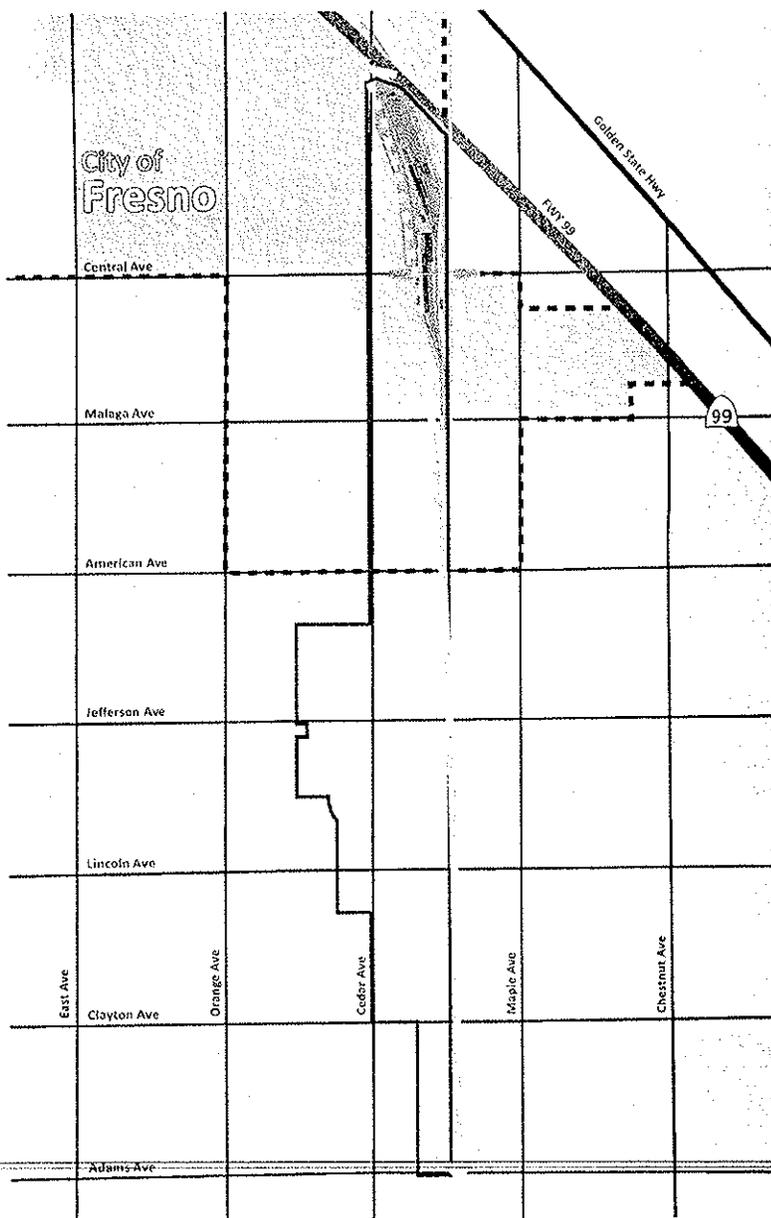
Alternative Layout Three is located north between the BNSF corridor, State Route 99 and Cedar Avenue. This alternative provides layout modifications and significantly reduces right-of-way impacts due to the fact that the CHSR alignment and HMF utilize shared rights of way. The alternative, like Alternative Layout Two, maintains all the same elements of track quantity and lengths, shop buildings footage, and parking lot space.

This alternative does not require the relocation of Cedar Avenue due to the narrowed width. Only one grade separated arterial is required (compared to two) for Central Avenue and requires no closures to existing roadways. Analysis of traffic impacts are the same as the "Template" Alternative Layout previously described, which were determined to have no adverse affects. Access to State Route 99 is greatly increased due to the close proximity of existing on and off-ramps.

This alternative also allows for modifications, expansion, and variations in relation to the mainline CHSR alignment without affecting its feasibility. This alternative has room to shift to the south or west to provide for additional storage and expandability as details are determined from the preliminary engineering study

that is on-going. Unlike the previous two alternatives, the physical constraints are the BNSF right-of-way to the east and State Route 99 to the north.

Right-of-way impacts are minimized as the footprint shares the impacted area created by Authority requirements. The CHSR alignment is on a viaduct structure above the HMF. The benefits of the shared HMF location and CHSR alignment will have significant cost savings in terms of right-of-way, as well as shared environmental area of potential effect (APE).



### ALTERNATIVE LAYOUT THREE

**HIGH SPEED RAIL  
HEAVY MAINTENANCE FACILITY**

CITY LIMITS  
 SPHERE OF INFLUENCE  
 SITE STUDY AREA  
 CA HSRA R.O.W. ELEVATED  
 BNSF R.O.W.

**BUILDINGS**

- ① SUPPORT SHOPS
- ② STORES
- ③ TRUCK/WHEEL SHOP
- ④ HEAVY METAL SHOP

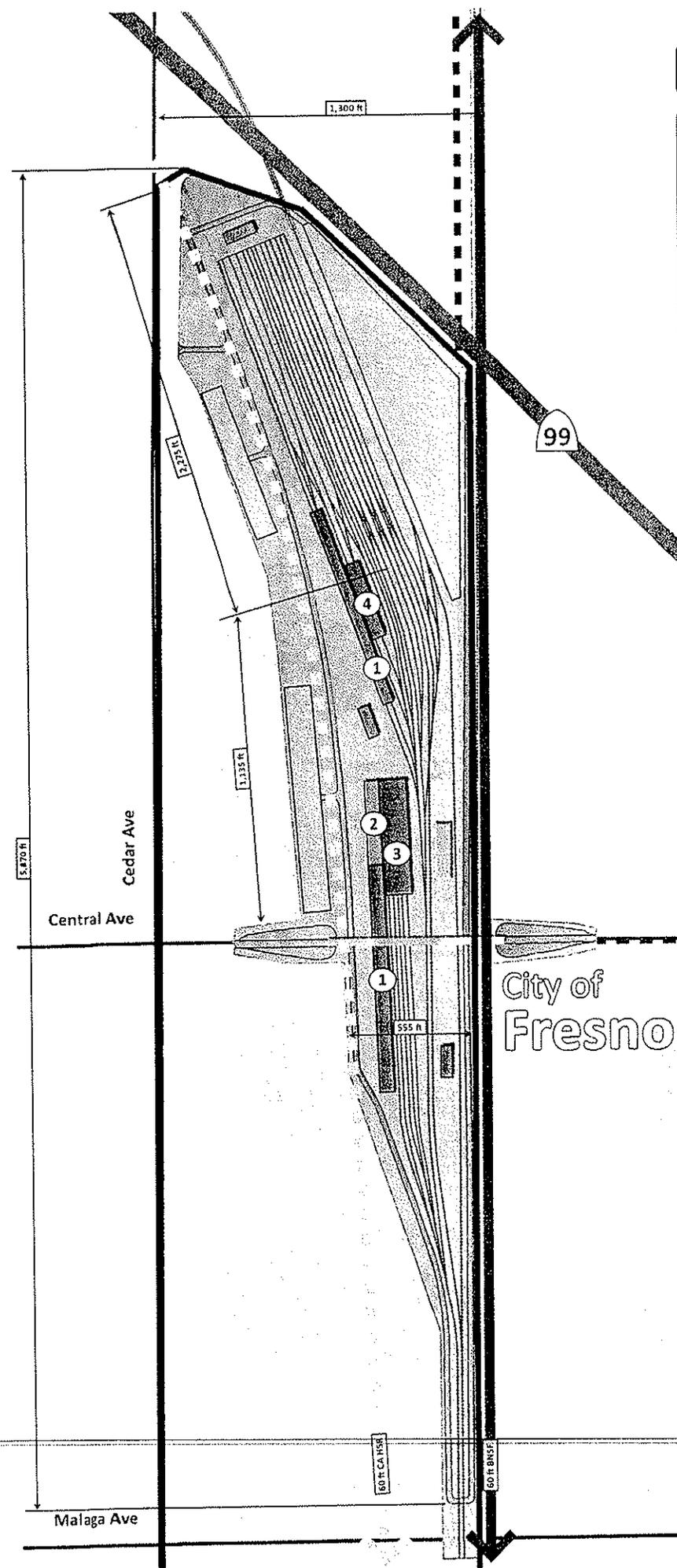
○ YARD RIGHT-OF-WAY  
 ● PARKING LOT  
 ■ BUILDING  
 + + + RAIL LINE  
 ● SUBSTATION  
 ● EMERGENCY GENERATOR

**SHOP TRACKS**

- S1 WHEEL TRUE
- S2 - S4 LEVEL III PERIODIC INSPECTION & SERVICES RUNNING REPAIR
- S5 - S9 COMPONENT CHANGE-OUTS
- S10 - S13 LEVEL IV - OVERHAUL
- S14 - S15 HEAVY REPAIR STORAGE
- S16 - S17 LEVEL V - HEAVY REPAIR
- S18 - S19 PAINT

**YARD TRACKS**

- Y1 - Y4 SPARE RATIO - FLEET
- Y5 - Y6 DAILY PRE-TRIP R/R LEVEL I AND II
- Y7 - Y8 SWITCHING TRACKS
- Y9 - Y11 MANIPULATION - LAYUP - DAILY
- Y12 - Y13 EIC ON PLATFORM



City of  
Fresno

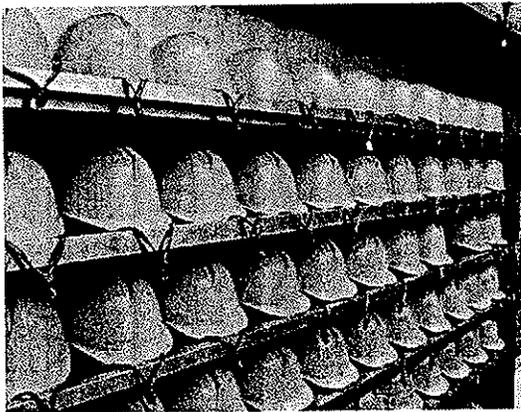




# RESOURCES AND INCENTIVES

## WORKFORCE AVAILABILITY

The Fresno Works team understands that access to an abundant supply of a qualified workforce is arguably the most important ingredient to the long term success of the HMF. The Fresno Regional Workforce Investment Board and our local universities and colleges have been active partners in the development of this proposal. They have already begun a comprehensive assessment of the numbers and skills of the employees required by the HMF and an analysis of the number of qualified job applicants already available today to fulfill the job requirements anticipated in the HMF.



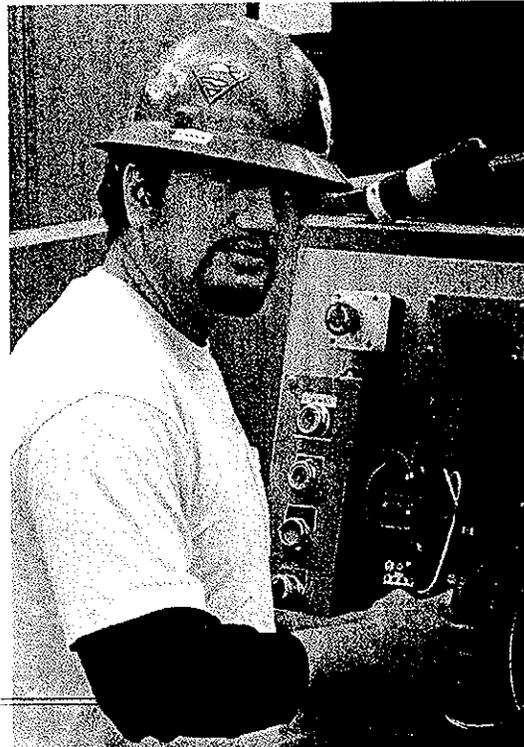
## WORKFORCE ANALYSIS

We have (1) estimated the number and skills of workers needed at the HMF based on similar maintenance facilities, (2) compiled information on the total available workforce in both Fresno County alone, as well as the Greater Fresno/Madera Region (Fresno, Madera, Tulare and Kings Counties - the Fresno labor shed), (3) conducted a "gap analysis" between the numbers and skills of workers required, and (4) assessed the current capacity of our technical and industrial training providers to determine the pipeline of future workers.

Per our analysis, the Fresno County Region possesses, both numerically and skills-set wise, an abundant workforce to meet both the construction and eventual operational needs of the HMF. While Fresno County's overall population is approximately 900,000, our adult working population is 397,920. Fresno's commute shed, the Greater Fresno Metropolitan Region, encompasses a four-county working population of 697,894. Whether assessing just the Fresno County working population or the working population across the entire commute shed, Fresno's access to workforce supply is more than adequate to fill the 2,300 anticipated jobs at the proposed HMF. The proposed HMF site is itself contiguous to the City of Fresno where the bulk of the four county working age population resides.

Based on Authority guidelines, the HMF will be modeled after either the French or Japanese systems. We have made contact with both the Consulate General of Japan and the Consulate General of France for more information on their respective high-speed train systems and corresponding job requirements. Neither office was able to provide information regarding specific job duties. Therefore, we have conducted our preliminary workforce analysis on specific job duties for existing rail maintenance facilities located throughout the United States.

*"...the Fresno County Region possesses, both numerically and skills-set wise, an abundant workforce to meet both the construction and eventual operational needs of the HMF."*



# RESOURCES AND INCENTIVES continued

Understanding that the quality of the workforce is as important as the availability of the workforce, the Fresno Regional Workforce Investment Board has been able to document that there are currently 2,185 Workforce Investment Act active clients in Fresno County alone that are training-ready for each job category identified at the HMF (see chart).

*"... Fresno Regional Workforce Investment Board has been able to document that there are currently 2,185 Workforce Investment Act active clients in Fresno County alone that are training-ready for each job category identified at the rail yard."*

JOB TITLE	O'NET CODE	WORK KEYS			AVAILABLE WORKFORCE
		AM	LI	RI	
Rail Yard Engineers, Dinky Operators and Hostlers Engineer, Conductor, Railcar Switcher, Railroad Engineer, Switchman, Equipment Operator, Car Repairman, Switch Crew Supervisor, Transportation Specialist, Yard Engineer	53-1043.00	3	4	5	1,487
Rail-Track Laying and Maintenance Equipment Operators Equipment Operator (TEO) Trackman, Machine Operator, Track Repair Person, Track Service Person	47-4061.00	4	4	4	1,767
Rail Car Repairers Maintenance Mechanic, Rail Car Repairman, Rail Car Painter/ Sandblaster, Air Brake Mechanic	49-3043.00	3	3	3	2,185
Railroad Conductors and Yardmasters Conductor, Engineer, Railroad Conductor, Yardmaster, Dispatcher, Agent, Brakeman, Freight Conductor, Trainman, Operations Manager	53-4031.00	3	3	3	2,185
Stock Clerks - Stockroom, Warehouse, or Storage Yard Store Clerk, Stocker, Bay Stocker, Material Handler, Order Selector, Shipper/Receiver, Stockroom Clerk, Warehouse Representative, Warehouse Worker, Warehouseman	43-5081.03	4	4	4	1,767
Transportation Vehicle, Equipment and Systems Inspector Inspector, Quality Assurance Inspector, Rail Technician, Diesel Engine Inspector, Emission Inspection Technician	53-6051-07	5	5	5	504
Traffic Technician Investigator, Traffic Control Technician, Traffic Investigator, Transportation Planning Technician, Traffic Analyst, Traffic Engineering Technician	53-6041.00	4	4	4	1,767
Computer Operators Information Technology Specialist, Software Technician, Systems Operator, Computer console Operator, Computer Technician	43-9011.00	4	4	5	1,431
First Line Supervisors/Managers of Mechanics Installers and Repairers Maintenance Supervisor, Maintenance Foreman, Maintenance Manager, Production Crew, Supervisor, Service Manager, Crew Leader, Facility Maintenance Supervisor, Maintenance	49-1011.00	4	4	4	1,767
Transportation Managers Transportation Director, Fleet Manager, Global Transportation Manager, Traffic Manager, Train Operations Manager	11-3071.01	5	4	5	1,146
Inspectors, Testers, Sorters, Samplers and Weighers Inspector, Quality Inspector, Quality Technician, Quality Assurance Inspector, Quality Control Inspector, Quality Auditor, Picker/Packer, Quality Assurance Auditor, Quality Control	51-9061.00	4	4	4	1,767



## RESOURCES AND INCENTIVES continued

### Labor Force Assessment Detail

Our labor force assessment is based on three key data elements: job titles, O\*Net Codes, and WorkKeys Assessment Levels. The following chart documents by job title, O\*Net Code, and WorkKeys assessment level the available Workforce Investment Act clients in Fresno County alone who are training-ready for each job category anticipated at the HMF. This is just a sample of the available workforce in Fresno County, as it does not take into consideration the non-WIA workforce in Fresno County or the workforce in the rest of the Greater Fresno Metropolitan Region. **Clearly, the availability of an abundant, qualified workforce is one of Fresno's greatest attributes for the HMF.**

### Additional Labor Assessment: Availability of Organized Workforce

One of the most important subsets of the workforce available to meet the needs of the HMF, both in its construction and in its eventual operation, is the organized workforce found in the Greater Fresno Metropolitan Region, which coincides with the service area of the Fresno, Madera, Kings, Tulare Building Trades Council. The FMKT Building Trades Council is comprised of the following individual unions:

- Cement and masonry;
- Drywall;
- Electricians;
- Fire sprinklers;
- Floor coverers;
- Iron workers;
- Operational engineers;
- Painters;
- Pile drivers;
- Plumbers;
- Sheet metal workers;
- Roofers;
- Boiler makers; and
- Laborers.

Generally, there are approximately 6,000 members across these 14 unions, all trained to the highest standards in their respective disciplines.

### Fresno's Training and Education Infrastructure

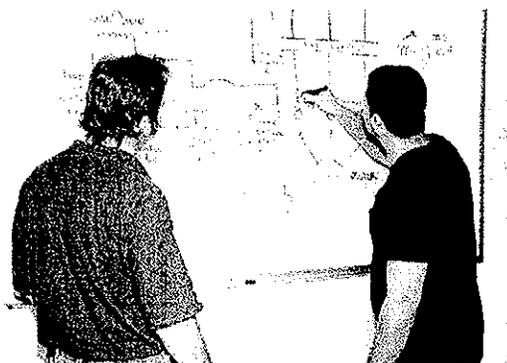
In addition to its building trades programs, Fresno County maintains the region's largest combination of higher education and training facilities with over 95,000 students pursuing higher education and training every year across almost a dozen public and private university and community college campuses. The technical training and education needed for the HMF can easily be met in Fresno. Some of our education and training institutions are highlighted below.

### California State University, Fresno

CSU Fresno is one of the largest campuses in the California State University system with over 22,000 students; 1,100 faculty members; and 26 nationally accredited departmental programs. Colleges within California State University, Fresno of particular interest to the CHSRA include the College of Science and Mathematics, the Department of Industrial Technology, the Craig School of Business, and the Lyles College of Engineering. Together, these colleges offer programs in:

*"...Fresno County maintains the region's largest combination of higher education and training facilities."*

- Construction Management
- Civil and Geomatic Engineering
- Electrical and Computer Engineering
- Mechanical Engineering
- Computer Science
- Earth and Environmental Sciences
- Logistics and Supply Chain Strategies
- Computer Information Systems
- Human Resource Management



### State Center Community College District (SCCCD)

SCCCD is one of the largest community college districts in California and serves over 55,000 people across five campuses. Fresno City College, the largest of the SCCCDC campuses, enrolls 34,000 students each year in over 100 associate of arts and science degree programs and over 60 vocational training programs. Fresno City College's Career and Technology Center has received state and national recognition as a model vocational education school excelling in community partnerships, competency based education, and job placement. Open entry allows individual instruction with "senior" students mentoring new students. Programs relevant to the HMF include:

## RESOURCES AND INCENTIVES continued

- Engine Performance/Electrical/Heating and Air Conditioning: 30-week program. Engine theory and testing, carburetors, vehicle computer operations, electrical, ignition, fuel injection, emission control, analyzers, heating and air conditioning, estimates/work orders, preparation for testing for ASE certification. Work on "live" projects.
- Engine Repair: 20-week program. Practical and theoretical training in general engine diagnosis, cylinder heads, valve train, engine block, lubrication and cooling systems.
- Warehouse Technician: 12-week program. Forklift driving, computer literacy, basic math skills, strapping, blueprint reading, inventory, shipping and receiving.
- Maintenance Mechanic: 30-week program. Oxyacetylene and stick welding, machining, lathe, drilling, hydraulics, pneumatics electrical, mechanical, use of power tools and equipment.



The Fresno City College Training Institute provides professional development, continuing education, career training, and worksite training programs. The Training Institute is the extension program for Fresno City College, so programs can be developed quickly to meet the needs of individuals, business and industry, and public sector organizations. The Training Institute conducts worksite training programs in:

- Industrial Electrical;
- Programmable Logic Controllers;
- Supervisory Skills, Communication & Team Skills;
- Computer Software Applications; and
- Customer Service Skills.

Fresno City College's Applied Technology Division may also be of interest to the CHSRA for the HMF. It provides experiences to guide students in their transition from the classroom to employment, employment upgrades and transfer to other training institutions. Fields of study offered by this division include air conditioning, architectural drafting, computer aided drafting and design, construction, electronic technology, environmental technology, industrial education, manufacturing technology, and welding/metal fabrication.

In addition to the education and training programs offered by California State University, Fresno

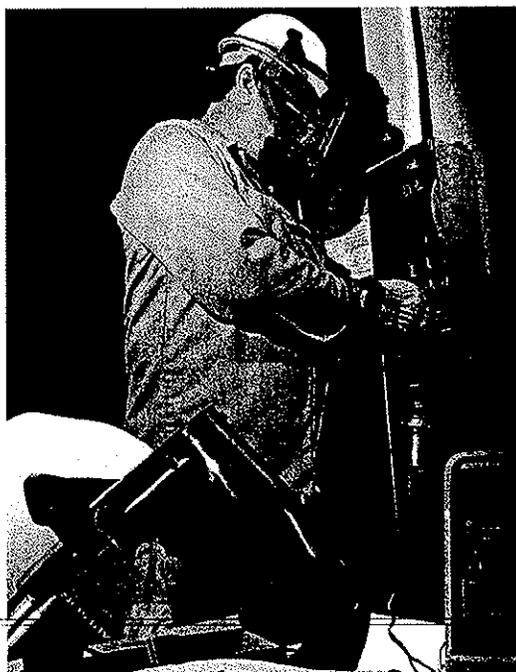
and State Center Community College District, the area also includes vocational training, associate degrees and/or undergraduate and graduate programs offered by Fresno Pacific University (private), West Hills Community College District (public), University of Phoenix (private), and San Joaquin Valley College (private vocational).

*"... the payroll impact alone is over \$200 million annually."*

### Economic Benefits

As the capital of the San Joaquin Valley, Fresno County is the economic engine that drives commerce for a four-county region, including Fresno, Madera, Kings, and Tulare Counties. Just as Fresno County is the center for healthcare, education, institutions, and commercial aviation, the county will also become the hub of high-speed rail. Attracted by ample business opportunities and quality cultural arts and entertainment, residents from surrounding areas regularly commute to Fresno. The location of the HMF in Fresno County will further propel the region's economic engine, catalyzing the Fresno's strategic plan for sustainable economic growth.

Based on similar HMF's around the world, the project cost could be estimated at \$800 million. According to the City of Fresno Economic Impact Study, over a five-year period, an HMF of that scale will create and sustain almost 5,000 jobs in a variety of industries including, but not limited to construction, manufacturing, and transportation. Based on an estimated total



## RESOURCES AND INCENTIVES continued

employment of 2,300 new workers for the Fresno County HMF, and based on a conservative average salary of \$47,000/yr., direct payroll revenues from the facility will amount to over \$110 million annually in Fresno County, with almost 75 percent of that revenue going to residents of the City of Fresno. Add to that another 2,700 indirect jobs, and the payroll impact alone is over \$200 million annually.

This data alone demonstrates that the Fresno County HMF will create high-paying, permanent jobs, and attract new companies in an underserved region of California.

Historically, Fresno County and surrounding communities were the heart of California's agricultural economy. In recent decades, markets have shifted leaving many parts of the Central Valley with struggling economies. Jobs are especially scarce with chronic unemployment hovering at over 15 percent. The impact of building the HMF in Fresno County would be immense and sustained. For the Authority, that translates into an abundance of readily available workforce candidates to support the facility's employment needs. With a four-county ripple effect, impacting higher than average unemployment rates, and with the ability to draw from a large workforce pool, **locating the HMF in Fresno County would be the Authority's most practical choice from a labor perspective, while providing California's most economically challenged region with much needed jobs.**



## RESOURCES AND INCENTIVES continued

### ECONOMIC INCENTIVES

The Fresno Works proposal includes a commitment of \$25 million to be used at the Authority's discretion for site acquisition, infrastructure, utilities and/or construction. We believe at this stage it is best to commit to a dollar amount that can be used by the Authority in any number of ways, as opposed to specifying exactly how the incentives must be used. With this approach, we are providing the Authority with maximum flexibility to invest the funds in a manner that will produce the most in return.

*"\$25 million...with maximum flexibility to invest the funds in a manner that will produce the most in return."*

#### Utility Infrastructure

The proposed site area is partially within the Fresno City limits and the Fresno City "Sphere of Influence." As such, the City of Fresno is prepared to provide the full array of public infrastructure improvements - street, sewer and water - necessary to support the facility. The City is supportive of using a number of financing alternatives, including the use of development fees, to provide the necessary infrastructure. Fresno City Council action was taken to affirm this commitment on December 17, 2009.

Pacific Gas and Electric (PG&E), one of the largest combination natural gas and electric utilities in the United States, stands ready to provide power necessary to operate the HMF in Fresno County. Once the location and load requirements for the HMF have been established, PG&E will be able to provide greater detail as to its commitment to the project.

#### Measure C

A viable funding source for infrastructure and the acquisition of land for the HMF is Measure C, Fresno County's self-help transportation improvement sales tax. Measure C funds have been programmed for use in a variety of transportation-related areas. Two particular subprograms provide funding that can be redirected toward the HMF. These subprograms are the New Technology Reserve Subprogram and the Rail Consolidation Subprogram. By the end of the life of Measure C, the two subprograms will accrue at least \$139 million. Upon conclusion of the public process required to redirect funds, the County of Fresno and City of Fresno are willing to commit a minimum of \$25 million from the two subprograms toward the land acquisition and infrastructure necessary to construct the HMF.

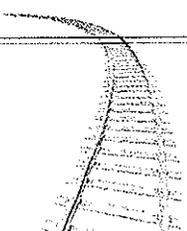
To accomplish redirection of funds from these Measure C Subprograms, an amendment to the Measure C Expenditure Plan would be required. The amendment process is a two-step process that requires public noticing and formal public hearings on the Plan Amendment by both the Council of Fresno County Governments Policy Board (COG) and the Fresno County Transportation Authority. This funding concept already has been taken before the Measure C Citizens Advisory Committee and the COG Board, comprised of the Chairman of the Fresno County Board of Supervisors and mayors from each of the County's cities. The COG unanimously approved initiation of the process at its November 2009 meeting. The Fresno County Board of Supervisors also unanimously voted to endorse proceeding with the process to amend the Measure C Expenditure Plan at its meeting on December 15, 2009.

When the HMF is sited in Fresno County, it will serve as a major economic stimulus and, in turn, generate greater sales tax revenue, thereby increasing these two subprogram funds and creating an even greater opportunity to complement the HSR initiative and HMF facility in Fresno with additional investments in new transportation technology and rail consolidation.



#### Road Improvements

Measure C provides separate funding for roadway improvements, such as maintenance, planned upgrades and improvements to highway interchanges that are programmed and funded using local Measure C dollars. The City and County have dedicated funding to maintaining and making necessary improvements to the roadways serving the Fresno County HMF site.



## **RESOURCES AND INCENTIVES** continued

### **Enterprise Zone**

The entire site area is located within Enterprise Zones. The majority of the site is located in the Fresno County Regional Enterprise Zone and the remainder is located in the City's Enterprise Zone. This will present huge incentives to investors. The benefits of the Enterprise Zone for a private sector company include the following:

- Firms can earn \$36,600 or more in state tax credits for each qualified employee hired.
- Corporations can earn sales tax credits on purchases of \$20 million per year of qualified machinery and machinery parts.
- Up-front expensing of certain depreciable property
- Lenders to Zone businesses may receive a net interest deduction.
- Unused tax credits can be applied to future tax years, stretching out the benefit of the initial investment.
- Enterprise Zone companies can earn preference points on state contracts.
- Up to 100 percent Net Operating Loss (NOL) carry-forward. NOL may be carried forward 15 years.



*"The entire site area is located within Enterprise Zones. This will present huge incentives to investors."*

# A BROAD VISION OF OPPORTUNITY

## FRESNO WORKS: A BROAD VISION OF OPPORTUNITY

The Fresno Works vision extends well beyond simply locating the HMF in our county to secure 2,300 permanent jobs for our residents. While we are extremely motivated by the jobs that would be created by the HMF, we believe the opportunity is much bigger than that. Fresno County will ensure the HMF becomes a catalyst for additional facilities and programs that support the success of high-speed rail throughout California, as well as for similar rail projects throughout the United States. The paragraphs below summarize the development concepts we intend to pursue if awarded the HMF site.

## PUBLIC PRIVATE PARTNERSHIPS

Understanding that the CHSR initiative still faces significant financing gaps, the County of Fresno is exploring any and all financing options for the HMF. We recognize that such financing decisions will be made at the sole discretion of the Authority. However, Fresno County wishes to be an informed partner in order to better support the Authority's efforts to secure necessary financing for the project.

## BUILDING INTEREST IN PRIVATE INVESTMENT

In recent months Fresno County has fielded an increasing number of calls and interest from a range of investment and development experts who specialize in public private partnerships for infrastructure projects. Some bring a background in finance. Others specialize in engineering and construction. Still others focus on operations, but all are very interested in investing in the HMF. Many are engaged in PPP projects on HSR systems in other parts of the world with varying degrees of success. **Fresno County is willing to participate with the Authority as partners in a PPP effort** should the Authority choose this approach for the HMF.

In addition, Fresno County representatives have coordinated a meeting between a CalPERS board member and members and executives from the area's local retirement systems. The meeting focused on investing in the HMF and resulted in great interest among local retirement systems for potential investments. Agenda items currently are being prepared to go before the local retirement systems to commence formal discussions before each system's board.

Furthermore, at the request of the County of Fresno, Rep. Jim Costa facilitated a meeting with national and major local community banks to discuss investing in this project. The meeting generated support for the concept, and many of the bank representatives expressed an interest in learning more about how they can participate as details become available.

## GLOBAL SHOWCASE FOR CHSR

We recognize that high-speed rail is quickly becoming one of the world's emerging industries. Because it will likely be the first of its kind in the United States and its adjacency to the first HSR test track, the CHSR HMF will be a national center for information,

innovation, resources and marketing associated with the development of HSR systems across America and throughout the world.

In addition to testing and commissioning of CHSR train sets, it is likely that the test track will be used extensively by vendors developing and promoting their rolling stock for other HSR systems around the world. We believe **the selected HMF site should be large enough to accommodate an adjacent national research center, training academy, conference center, and supportive commercial and office development to support this emerging global industry.** In order to support this vision, the Fresno Works site area encompasses almost 700 acres, far more land than required for the HMF alone, but sufficient to accommodate national level programs and facilities for the HSR industry.

*"Fresno County will ensure the HMF becomes a catalyst for additional facilities and programs that support the success of high-speed rail throughout California, as well as for similar rail projects throughout the United States."*

For example, we anticipate key facilities with significant presence and revenue streams that will maintain permanent operations could include:

- A U.S. Federal Railroad Administration High Speed Rail certification and test facility;
- A large facility for the eventual CHSR rolling stock vendor to service and promote its engines and cars;
- Facilities for global rolling stock manufacturers (not associated with the CHSR) to help develop, test and market their engines and cars.

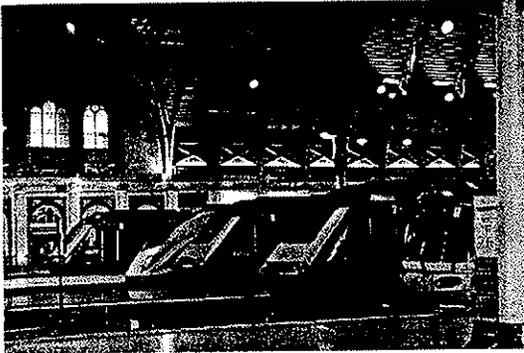
## HIGH SPEED RAIL INDUSTRIAL PARK

High-Speed Rail is the catalyst for economic development for the state. Companies that are looking at the California market to expand and grow their market share will want



# A BROAD VISION OF OPPORTUNITY continued

to position their companies to take advantage of the opportunities high-speed rail will afford them. Fresno County is the central most location in the state, and combined with Fresno County's innovative support, the HMF will be strategically positioned for its greatest success.



Combined with the aforementioned Enterprise Zone enhancements, proximity to the HMF and all that it entails operationally, the Fresno County site area presents several prime, shovel-ready sites that will provide economic and competitive advantages to prospective industrial developers. Fresno Works vision for a high-speed rail oriented industrial park will save both cost and time for development, while enhancing revenue to offset the cost of doing business for the Authority. It also sets aside a specific area for future opportunities and growth.

The County of Fresno will create this high-speed rail oriented industrial park adjacent to the HMF. The County will create a fast track process as part of the park development. Creating this specialized industrial park will be pre-permitted for the attraction of CHSR oriented businesses. The envisioned process will streamline environmental and entitlement requirements, attracting and nesting CHSR oriented companies from around the country, as well as the San Joaquin Valley.

The Fresno County CHSR Oriented Industrial Park will offer:

- Financial incentives including Enterprise, Foreign Trade, and Hub Zones
- Global and national marketing through the Economic Development Corporation serving Fresno County specifically promoting the High-Speed Rail advantage;
- Technical assistance and help with the fast track permitting process substantially expediting any High-Speed Rail oriented project

This forward-thinking approach by Fresno County will lead to the creation of the most advanced industrial park, new jobs, substantial outside investment, and a sustainable, regional economic engine. The industrial park will be designed with advances at all levels including architecture, engineering and construction by way of CC&Rs that will assure a minimization of air pollution, water waste, and energy use through innovative advanced green technologies. In addition to having a positive impact on job creation and the economy, the HSR Oriented Industrial Park will also have a positive impact on key quality of life issues, including poverty and unemployment in a seriously distressed area of California.

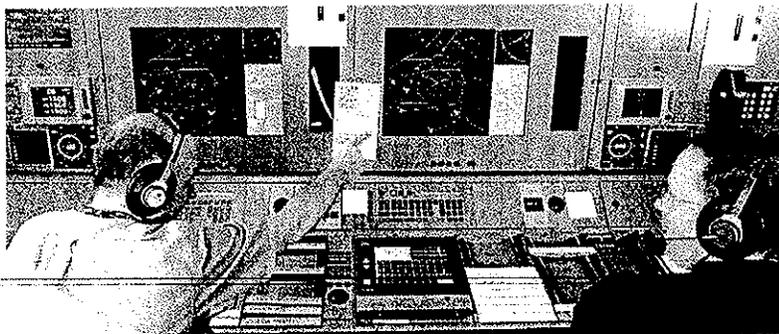
## RESEARCH AND INNOVATION CENTER

Our vision is to see the HMF established as a national center for new technology and information exchange regarding HSR and, as a result, a breeding ground for spin offs and new entrepreneurial firms that spark further economic opportunity. We intend to seek academic, public, and private partners to co-locate in and around the HMF to create an entrepreneurial environment to accomplish that vision. **We're Californians - we shouldn't just buy trains and equipment from other parts of the world. We should do what we've always done - reinvent the system and sell it back to the world.**

## Conference Center

We anticipate the CHSR HMF will draw a steady stream of visitors, either to learn more about HSR, the rolling stock, or to market their equipment or technology. Such trade will establish a critical mass requiring the need for a moderate to large sized conference center to support meetings, training and presentations, and conferences. We have selected the Fresno County site area, in part, because it will accommodate these potential, additional facilities.

*"...Fresno Works is proposing to create a national high-speed rail research and training academy."*



# A BROAD VISION OF OPPORTUNITY continued

## SAN JOAQUIN VALLEY HIGH SPEED RAIL ACADEMY

To help foster and maintain a skilled workforce and establish a national presence for CHSR system, Fresno Works is proposing to create a national high-speed rail research and training academy. The idea is to develop a railroad science training program offered through Fresno City College using the curriculum developed by the National Academy of Railroad Sciences (NARS). A similar joint venture currently exists with the Johnson County Community College (JCCC) in Overland Park, Kan. Further, JCCC has agreed to be a resource on the public curriculum in the formation of the SJVARS.

The San Joaquin Valley Academy of High-Speed Rail Sciences would train individuals seeking to join the high speed rail industry and people who work around or with railroad facilities in other industries. SJVARS would provide high quality, value-added training through the most comprehensive, hands-on, and technically-proficient and industry-current instructors.

With a Fresno County-based Heavy Maintenance Facility, the Fresno Regional Workforce Investment Board, in conjunction with our partners:

- State Center Community College District - Fresno City College
- West Hills Community College District
- California State University, Fresno
- The Fresno Madera Kings Tulare Central Labor Council
- The Fresno Madera Kings Tulare Building Trades Council
- The International Brotherhood of Teamsters (IBT), Brotherhood of Locomotive Engineers & Trainmen (BLET)

The creation of the San Joaquin Valley Academy of Railroad Sciences would bring together public resources in workforce development and training to ensure:

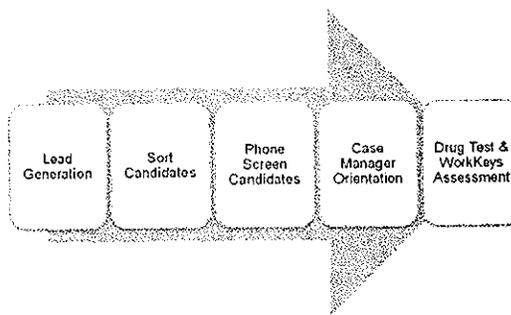
- A ready and skilled workforce for the HMF based in Fresno County
- A ready and skilled workforce for the high speed rail project for the State of California

With the existing resources and forged partnerships between workforce development, vocational training and higher educational institutes, Fresno County can provide California with a world class facility that will serve as a model for sustainable building and high speed rails across the nation.

### *Additional Training and Research*

While the Fresno Area already enjoys a robust and comprehensive education and training system that will serve the HMF, our local colleges and universities have already expressed an interest in developing additional programs to further support the HMF, as well as the CHSR initiative. Preliminary concepts include:

*Pre-Apprenticeship Training* - The Fresno County Regional Workforce Investment Board (FRWIB) will institute a new screening regimen to find stable applicants for consideration as pre-apprentices by union that will represent workers at the HMF (presumably the International Brotherhood of Teamsters and the Brotherhood of Locomotive Engineers & Trainmen). Specifically, FRWIB would provide its labor partners with the following pre-apprentice support:



Once candidates are assessed, FRWIB would interview the candidates, conduct the requisite background check and screen for eligibility to be hired at the HMF and select the top candidates from the potential training pool. Once selected, FRWIB will provide a College/ Training Orientation for the selected candidates prior to commencing the training. This process would be implemented to improve hiring efficiencies to identify a qualified workforce, improve retention and progression rates and hire local candidates with trained soft skills and demonstrated work ethics.

*Transportation Systems Management Programs* - The Fresno State Industrial Technology Department is interested in expanding its Transportation Systems Management program to include bachelor's and master's degrees with emphases in high-speed rail management.

*"Fresno Area...colleges and universities have already expressed an interest in developing additional programs to further support the HMF and CHSR"*

### *The Partners:*

#### *Fresno City College:*

FCC's Career and Technology Center has received state and national recognition as a model vocational education school excelling in community partnerships, competency based education and job placement. The program currently provides students with certifications attainable in as little as a few weeks.

# A BROAD VISION OF OPPORTUNITY continued

**The FCC Training Institute:**

an extension program for Fresno City College, so programs can be developed quickly to meet the needs of individuals, business and industry, and public sector organizations. The programs in the FCC Training Institute are for professional growth and development and are not for college credit. Based on the Johnson County Community College model, below are some sample titles of training programs within the proposed Railroad Sciences degree that Fresno City College may provide:

Degrees	Certificates
Railroad Operations	Conductor Option, A.A.S.
Locomotive Electrical	Certificate
Railroad Operations	General Option, A.A.S.
Locomotive Mechanical	Certificate
Railroad Operations	Mechanical Option, A.A.S.
Railroad Freight Car	Certificate
Railroad Operations	Welding Option
Railroad Conductor	Certificate

Using the Heavy Maintenance Facility for hands-on learning, the joint venture between FCC and FRWIB, can teach both basic and advanced skills necessary for a career in the rail industry to potential new employees and current railroad employees in virtually every industry craft.

Conductors learn and practice skills in an outdoor train yard, complete with various types of operating locomotives and freight cars. The program could be easily adapted to the skills of HSR.

Mechanical employees train in workshops, including a freight car lab, locomotive lab, and locomotive electrical. Each lab is fully equipped to provide hands on experience with mechanical and electrical components of cars and engines. Maintenance and engineering crews work on an open air track lab outfitted with rails and ties. This area also has a fully operative locomotive crane. Signal operators train on the actual signals, electronic switches and computer apparatus they will install and service in the field. Telecommunications specialists learn and practice on the precise equipment they will encounter on the job. Those programs that provide transferrable college credit can be foundational for the further advancement at California State University, Fresno.



**California State University, Fresno**

The Lyles College of Engineering is the oldest publicly supported engineering college in the San Joaquin Valley, offering engineering programs since the 1920s. Programs include:

- Construction Management
- Civil and Geomatics Engineering
- Electrical and Computer Engineering
- Mechanical Engineering

The current specializations at the Lyles College of Engineering will work jointly with the Industrial Technology Department in offering specialized courses focused on Railway Engineering to prepare graduates to work in the High Speed Rail in California. In addition, the college faculty will offer expertise on sustainable buildings and energy sources for the high speed rail - heavy maintenance facility. The Department of Industrial Technology is the only four-year university program in the San Joaquin Valley to offer bachelor's and master's degrees in transportation systems management. It will also offer an emphasis in high speed rail management for both BS and MS to meet the personnel needs of high speed rail management team.

**SUSTAINABLE HMF AND GREEN COLLAR JOBS**

Fresno County is committed to supporting the Authority in building a facility that minimizes adverse impacts to the environment, energy dependency and climate change issues. We believe the HMF should be a global showcase in sustainability, maximizing opportunities for green collar job creation and training, energy efficiency and power generation, and natural resource protection. Our commitment to a sustainable development and process will expedite the environmental review process, as well as position the project for government grants targeting energy efficiency and conservation in the building and planning sector and the development of green collar jobs and training opportunities.

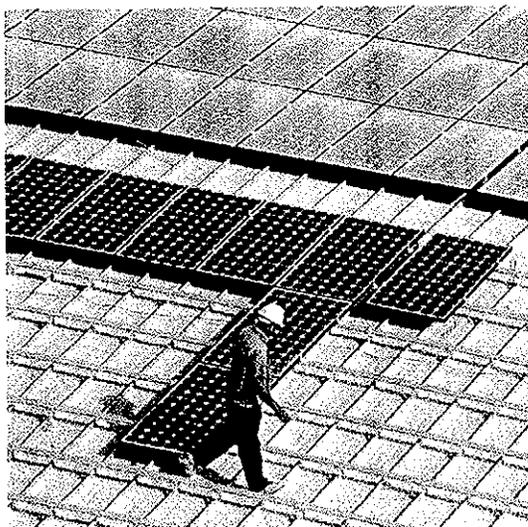


Fresno Works: Expression of Interest for California High Speed Rail  
Heavy Maintenance Facility

# A BROAD VISION OF OPPORTUNITY continued

Sustainable opportunities for this facility are numerous and include:

**Site Resource and Stormwater Management** - We have already begun to assess the innovative opportunities to meet and exceed the storm water management requirements through green infrastructure strategies and bio-filtration opportunities on the proposed site and surrounding areas. We will target the potential mitigation issues of the environmental impact study on the surrounding lands with our green infrastructure strategies.

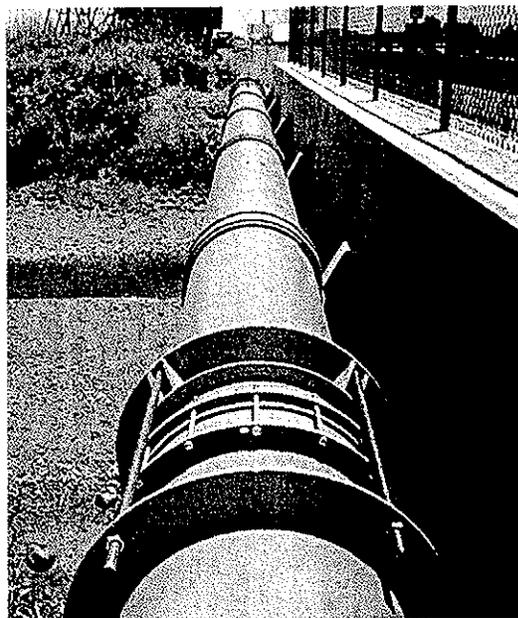


**Energy Conservation and Opportunities for Renewable Energy Generation** - We see the energy sector as the key area for achieving carbon neutral solutions, as well as opportunities for public private partnerships with local businesses. Through local and regional technical expertise and incentives we will support efforts to develop a facility that attempts to match the high standards of energy conservation through building and systems design and facility operational guidelines. In addition, on-site renewable energy generation is one of our key priorities. We can provide the local expertise and support in this area on many levels:

- Research into on-site renewable resources
- Focusing on solar and geothermal and wind turbine technology
- Leveraging local technical knowledge
- Training and expertise and recommending locally known vendors that can provide the full service through installation.

**Potable Water Resource Conservation and Management** - Water resource conservation is a considerable challenge in California, and Fresno County sees this as an opportunity for the long-term commitment and benefits. We will support the HMF's needs to reduce the use of potable water for landscaping, maintenance or non-potable water needs by assessing the use of a "purple pipe" gray-water system to the development or by providing incentives and technical support to the project for researching viability and opportunities for on-site rainwater catchment and storage off of the roof areas.

**Waste Management and Recycling** - As mentioned above, the City of Fresno is the top recycling city in the nation with a 72 percent diversion rate. We have robust recycling programs that could easily be expanded to provide ample opportunities to support the waste management programs at the new facility. We will also offer the opportunity for creating the re-cycle and re-use center focusing on parts and machinery used at the facility. This is potentially a thriving business opportunity that can create hundreds of new green jobs.



*"...the HMF should be a global showcase in sustainability, maximizing opportunities for green collar job creation and training, energy efficiency and power generation, and natural resource protection."*



CALIFORNIA  
STATE  
UNIVERSITY,  
FRESNO

December 22, 2009

Mr. Mehdi Morshed, Executive Director  
California High Speed Rail Authority  
925 L Street, Suite 1425  
Sacramento, CA 95814

Dear Mr. Morshed:

As the premier institution of higher education in Central California, we offer our support and commitment to collaborate with the California High Speed Rail Authority in the placement of the Heavy Maintenance Facility in Fresno County.

California State University, Fresno has developed successful and active partnerships with educational and business leaders, health care providers, non-profit agencies, and state and federal governmental institutions, as part of our commitment to prepare a skilled workforce for one of the most neglected regions in the state of California. Our diverse and dedicated faculty continues to offer expertise in a number of areas that are beneficial to the economic development of our region; their efforts are reinforced by our establishment on campus of the Office of Community and Economic Development, which has provided staffing and support for the Regional Jobs Initiative, and the California Partnership for the San Joaquin Valley. Our relationships with Fresno County have continued to flourish, through on-site educational workshops and degree completion programs for many of their staff, offered by several of our Institutes and Centers, and primarily through the Office of Continuing and Global Education.

The Heavy Maintenance Facility (HMF) in Fresno County will provide added value to our work in this region, with the promise of job creation and training opportunities for over 1,000 potential new workers. We envision that our role will include training in general areas such as central control supervision, system-wide engineering, and rolling stock maintenance, as well as in management and clerical support. In addition, we have faculty and graduate students prepared to offer technical and research advice as well as scholarship linked to the agricultural and environmental impact that the HMF will have in the region. More specifically, our faculty from the Lyles College of

Office of the President  
Harold H. Hank Administrative Center  
Henry Madden Library, Suite 4194  
5700 North Barnes Ave. MS-M-88  
Fresno, CA 93740-8014  
559-278-3324  
Fax 559-278-4715



THE CALIFORNIA STATE UNIVERSITY

Mr. Mehdi Morshed  
December 22, 2009  
Page 2 of 2

Engineering and the Craig School of Business can provide expertise in processes that include failure analysis, wear evaluation, materials/component testing, advanced design or redesign, lean operations, supply chain analysis, inventory control, and decision management. Our ties to the Regional Jobs Initiative Manufacturing Cluster will provide a support infrastructure tying the HMF to Fresno State and the local industry and suppliers.

Fresno County is the ideal location for the HMF, providing a central point connecting the north and south regions, a rich urban setting that supports industrial development, and a wealth of university expertise. I fully endorse the "Expression of Interest" being submitted by the County of Fresno, City of Fresno, and the Council of Fresno County Governments and encourage you to give Fresno County full consideration as the site for the HMF.

Sincerely,

John D. Welty  
President

JDW:WC:mcu



Roberto L. Peña  
Retirement Administrator

FRESNO COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

BOARD OF RETIREMENT

Eulalio Gomez, Chair  
James E. Hackett, Vice Chair  
Michael Cardenas  
Nick Cornacchia  
Franz Criego  
Vicki Crow  
Steven J. Jolly  
Phil Larson  
John P. Souza  
Ronald S. Frye, Alternate

January 8, 2010

Mr. Mehdi Morshed  
Executive Director  
California High-Speed Rail Authority  
925 L Street, Suite 1425  
Sacramento, California 95841

Dear Mr. Morshed:

The Fresno County Employees' Retirement Association (FCERA) received a presentation from Supervisor Henry Perea, Co-Chair of the Fresno Works team dedicated to responding to the Authority's request for a Heavy Maintenance Facility Expression of Interest. We concur with Fresno Works and believe that Fresno County is the best location for the facility.

Please note that as more details arise about the Heavy Maintenance Facility and the possible rate of return expectations of this endeavor, we will be better poised to make a more concrete investment decision on whether to invest a portion of our approximate \$2.5 billion portfolio in the Fresno County located facility project.

In the meantime, we hope you will choose Fresno County for the location of the Heavy Maintenance Facility. It is a win-win for the Authority and the residents of Fresno County.

We look forward to learning more about investing in your Heavy Maintenance Facility

Sincerely,

Eulalio Gomez  
Chairman of the Board of Retirement

ea

1111 H Street, Fresno, CA 93721. Tel 559.457.0681 Fax 559.457.0318



**Central Labor Council of  
Fresno, Madera, Tulare & Kings Counties  
AFL-CIO**

*Serving Fresno, Madera, Tulare, and Kings Counties*

January 6, 2010

High Speed Rail Authority  
Sacramento, CA.

Re: Maintenance facility location

To High Speed Rail Commission,

High Speed Rail in California will be good for all of us! High Speed Rail will create sustainable green jobs, spur economic growth and protect our environment and the long term sustainability of our state. The construction and operations of the system will create hundreds of thousands of green jobs at a time when unemployment is at an all time high.

The Fresno-Madera-Tulare-Kings Counties Central Labor Council strongly endorses the selection of the Fresno County site as the Authority considers an appropriate location for the proposed maintenance facility. The Central Labor Council will be a key contributor to the overall labor needs of the project and will work in concert with a broad spectrum of community partners in assuring the success of the effort.

We encourage the selection of the FRESNO WORKS proposal.

In Unity,

Randy L. Ghan  
Exec. Sec.-Treas.

## International Brotherhood of Electrical Workers Local 100

1921 NORTH GATEWAY, SUITE 100 • FRESNO, CALIFORNIA 93727

TELEPHONE (559) 251-8241 • FAX (559) 251-0543

Members of the High Speed Rail Authority:

The International Brotherhood of Electrical Workers Local Union 100 is in full support of the High Speed Rail project in California, not only from a jobs perspective but from a Green perspective. We believe it is in the best interest of all Californians to Go Green, to build Green, and to promote Green construction whenever possible.

We are very interested in partnering with any and all agencies involved in the effort to locate the Heavy Maintenance Facility in Fresno County.

If we can be of further assistance, please feel free to call Chuck Riojas at 559-696-2066.

Respectfully,



Gerald O. Zumwalt  
Business Manager  
IBEW Local 100



## State Center Community College District

Office of the Chancellor

1525 East Weldon Avenue • Fresno, California 93704

Telephone (559) 244-5901 • FAX (559) 226-3757 • www.scccd.edu

December 16, 2009

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William J. Smith

*Vice President*

Patrick E. Patterson

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Isabel Barreras

Richard Caglia

H. Ronald Feaver

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Thomas A. Crow

*President*

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Cynthia E. Azari

*Vice Chancellor*

North Central

Terry Kershaw

*Vice Chancellor*

Finance & Administration

Douglas R. Brinkley

*Interim Vice Chancellor*

Workforce Development

& Educational Services

Michael Quinn

Mehdi Morshed  
Executive Director  
California High Speed Rail Authority  
925 L Street, Suite 1425  
Sacramento, CA 95814

Dear Mr. Morshed:

On behalf of State Center Community College District (SCCCD), I am submitting this letter of support for locating the Heavy Maintenance Facility in Fresno County. State Center Community College District is a multi-campus district comprised of two fully accredited colleges, as well as three major educational centers located in Fresno, Madera and Oakhurst. In addition, SCCCDD offers educational services in several satellite centers throughout the Central Valley.

With over 30,000 students enrolled annually, SCCCDD is the largest institution of higher education in the Valley. SCCCDD is also a leader in workforce development and offers many state-of-the-art training programs for students seeking vocational education. Through our campuses and centers, we will be a natural source for providing the 1500 estimated employees that you will need at the Heavy Maintenance Facility (HMF). In review of the criteria outlined in the RFEI on the Authority's website, it is clear that the "availability of local labor force to support employment needs and economic benefits to cities and local communities" can be found here in Fresno County.

SCCCDD's close partnerships with the local K-12 districts, California State University, Fresno, the Workforce Investment Board and the Economic Development Corporation, strengthen our ability to provide HMF with a highly skilled workforce for today and for the future. I hope you will carefully consider Fresno County when determining the location of the Heavy Maintenance Facility. It would be our pleasure to work with you in fulfilling your needs.

Sincerely,

Thomas A. Crow  
Chancellor

EQUAL OPPORTUNITY EMPLOYER



Fresno Construction & Engineering  
5555 E. Olive Ave. Rm E100DE  
Fresno, CA 93727

January 8, 2010

Melki Morshed, Executive Director  
925 L Street, Suite 1425  
Sacramento, CA 95814

Mr. Morshed,

This letter is a commitment to serve communication services to the High Speed Rail Heavy Maintenance Facility site proposed in Fresno near Cedar and Lincoln Avenue.

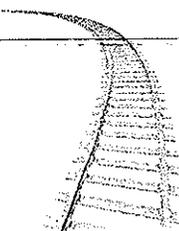
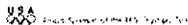
AT&T is a leader in delivering world class communication services that allows businesses and communities to stay connected to their world. It is this commitment to service and quality that sets it apart.

As such, should this site be selected AT&T has the ability to provide local basic communications and data services that will enable the facility to commence construction. If given the opportunity to discuss the High Speed Rail ultimate communications requirements for this location, AT&T would have the ability to propose the best communications products and services that meet the goals and objectives of the project.

AT&T looks forward to the prospects of this new project being built in Fresno and will strive to exceed on the delivery and quality of services.

Regards,

Israel Chavez  
Area Manager Construction & Engineering- Fresno  
AT&T  
5555 E. Olive Ave.  
Fresno, CA. 93727  
559-454-3346 Office  
559-304-5395 Cell





**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



January 11, 2010

Mr. Mehdi Morshed, Executive Director  
California High Speed Rail Authority  
925 L Street, Suite 1425  
Sacramento, CA 95814

Dear Mr. Morshed:

The San Joaquin Valley Air pollution Control District (District) supports the siting of the High Speed Rail Heavy Maintenance Facility in the San Joaquin Valley. Logistically, the Valley is the ideal location for this facility, as well as being the likely location for the early phase high speed test track. From an economic perspective, this facility will have a positive effect on the San Joaquin Valley's economy which has been harder hit by the economic downturn than other regions of the state.

Staff working on the proposed site in Fresno County contacted District staff early in their site development process and sought measures to reduce the air quality impact of their project. Additionally, the project proponents requested information about any pertinent air quality grants, and have indicated that they will fully pursue those option if their site is chosen. The District manages over \$100 million in air quality grants annually

The District looks forward to working with the High Speed Rail Authority to build a facility in the Valley that mitigates air quality impacts, so that the economic benefits noted above can be realized.

Sincerely,

Seyed Saafredin  
Executive Director/APCO

Seyed Saafredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95350-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1930 E. Getzysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 239-6680 FAX: (559) 230-6061

Southern Region  
31916 Frijoles Court  
Bakersfield, CA 93309-9725  
Tel: (818) 392-5500 FAX: (818) 392-5585

[www.vapcc.org](http://www.vapcc.org) [www.healthyliving.com](http://www.healthyliving.com)

Printed on recycled paper

Bank of America  
Merrill Lynch

GLOBAL COMMERCIAL BANKING

Rudy B. Medina, Market Executive  
Fresno Commercial Banking Office  
CA1-141-01-02  
5292 N. Palm Avenue  
Fresno, CA 93704

January 7, 2010

California High-Speed Rail Authority  
925 L. Street, Suite 1425  
Sacramento, CA, 95814

**Subject: Support for Fresno Location for proposed Central Valley Heavy Maintenance Facility**

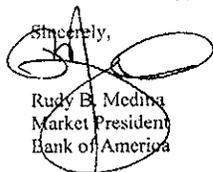
Bank of America supports efforts to improve mobility, protect the environment and foster economic revitalization. We believe that major transportation infrastructure projects will contribute greatly to achieving these overall goals. The bank was proud to be a supporter of the Prop 1A state bond that would provide resources to advance a variety of infrastructure projects, including the proposed California High-Speed Train project.

As Fresno Market President for Bank of America, I want to express my support for the County of Fresno in their effort to bring the High Speed Rail project's Heavy Maintenance Facility to the Central Valley. Fresno is ideally located in the center of the entire High Speed Rail route and importantly, in the center of the "test track." Fresno also boasts a well-trained workforce and will develop innovative workforce training programs to further assist in the maintenance needs. The economic stimulus impact to the region will contribute greatly to reducing the current high unemployment and generate what is estimated in the billions of dollars in annual economic benefits.

The County and City of Fresno, along with community stakeholders are actively engaged in delivering a competitive bid for the Maintenance Facility. Fresno has identified the ideal site and has developed the approach, methodology, and timelines for acquisition and construction of the facility. Bank of America Fresno Market team joins in supporting local efforts to secure designation of the facility in our region by the High Speed Rail Authority.

For over a century, Bank of America has served to enhance the economic vitality of the state and local communities. We will continue to engage with the County, the City, and community stakeholders in support of this effort in Fresno.

Sincerely,



Rudy B. Medina  
Market President  
Bank of America

Cc: Jim Costa, US House of Representative, California's 20<sup>th</sup> Congressional District  
Henry T. Perea, Supervisor District 3, The County of Fresno

REVISED  
BEFORE THE BOARD OF SUPERVISORS  
OF THE COUNTY OF FRESNO  
STATE OF CALIFORNIA

IN THE MATTER OF SUPPORTING THE STRONG AND FINANCIAL STRATEGIES NEEDED TO LOCATE A HIGH-SPEED RAIL HEAVY MAINTENANCE FACILITY IN FRESNO COUNTY.

RESOLUTION NO. 09-526

WHEREAS, the Fresno County Board of Supervisors has been a strong advocate for high speed rail in California and in the San Joaquin Valley; and

WHEREAS, the voters approved Proposition 1A on November 4, 2008, which provides for the purpose of establishing a statewide high speed rail facility that will link San Francisco to Los Angeles as well as other California cities, including Fresno, with trains that will operate at speeds up to 222 miles per hour; and

WHEREAS, the California High-Speed Rail Authority (CHSRA) is faced with competing for planning and environmental efforts, and as part of these efforts has determined that it will establish a Heavy Maintenance Facility in the Central San Joaquin Valley; and

WHEREAS, the CHSRA has invited interested parties to submit an Expression of Interest that will be used in identifying potential sites for planned High-Speed Train Maintenance Facilities that meet the Authority's minimum facility siting requirements; and

WHEREAS, County and City of Fresno are proposing a partnership for the purpose of developing a competitive proposal of economic incentives in support of locating the heavy maintenance facility in Fresno County; and

WHEREAS, the County and City of Fresno have been actively engaged with

other community stakeholders including the Economic Development Corporation Serving Fresno County and the Workforce Investment Board in understanding a potential site as well as various financial incentives that could be used to attract the siting of a Heavy Maintenance Facility in Fresno County; and

WHEREAS, the location of the heavy maintenance facility in Fresno County would serve as much needed stimulus to the local economy and create an estimated 1,500 new jobs a year which will reduce the current high unemployment rate, and generate more than \$2 billion annually in economic benefits; and

WHEREAS, it is anticipated that competition for location of the heavy maintenance facility from other Central Valley cities will be strong; and

WHEREAS, submission of a proposal including economic incentives in support of locating the heavy maintenance facility in Fresno County will strengthen the competitive advantage for Fresno County and County; and

WHEREAS, it is vital that financial incentives and other funding opportunities be available to support the effort; and

WHEREAS, the County will seek funding or funding participation with public and/or private partners to offset certain costs related to location of the Heavy Maintenance Facility and the High-Speed Rail corridor in Fresno County; and

NOW, THEREFORE, BE IT RESOLVED, that the Fresno County Board of Supervisors, recognizing the economic benefits that the siting of a Heavy Maintenance Facility will provide to the region and the economy, has committed, a local partner to submit an Expression of Interest for siting the Heavy Maintenance Facility in Fresno County; and to support the development and use of various financial strategies to successfully locate the Heavy Maintenance Facility within Fresno County.

2

THIS RESOLUTION WAS PASSED AND ADOPTED by the following vote of the Board of Supervisors of the County of Fresno this 16<sup>th</sup> day of December 2009, to wit:

AYES	Supervisors Heera Poonigam, Cassi Larkin, Anderson
NOES	None
ABSENT	None

*Steven B. Anderson*  
\_\_\_\_\_  
CHAIRMAN, BOARD OF SUPERVISORS

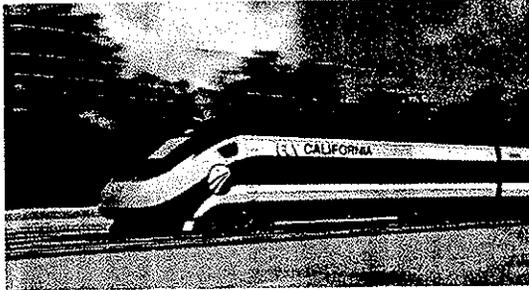
ATTEST:  
KERRIST F. SCHREI  
Clerk, Board of Supervisors

*[Signature]*  
\_\_\_\_\_  
Deputy

APPROVED & RESOLUTION NO. 09-526

3

# EXECUTIVE SUMMARY continued



## UNIFIED SUPPORT

Fresno Works is an unprecedented coalition of officials from the City of Fresno, Fresno County and the Council of Fresno County Governments working together to ensure the success of the California High-Speed Rail initiative and the HMF in Fresno County. These local government authorities have come together in support of this effort to bring forward a technically responsive and compelling expression of interest in locating the HMF in Fresno County. The Fresno County Board of Supervisors and the Fresno City Council have both passed resolutions supporting action to welcome the HMF to Fresno County and provide the financial incentives and cooperation necessary to make it happen. Fresno County is proud of the fact it provided the largest percentage vote of any county in the San Joaquin Valley in support of Proposition 1A, the Safe, Reliable High-Speed Passenger Train Bond Act, on the November 2008 ballot.

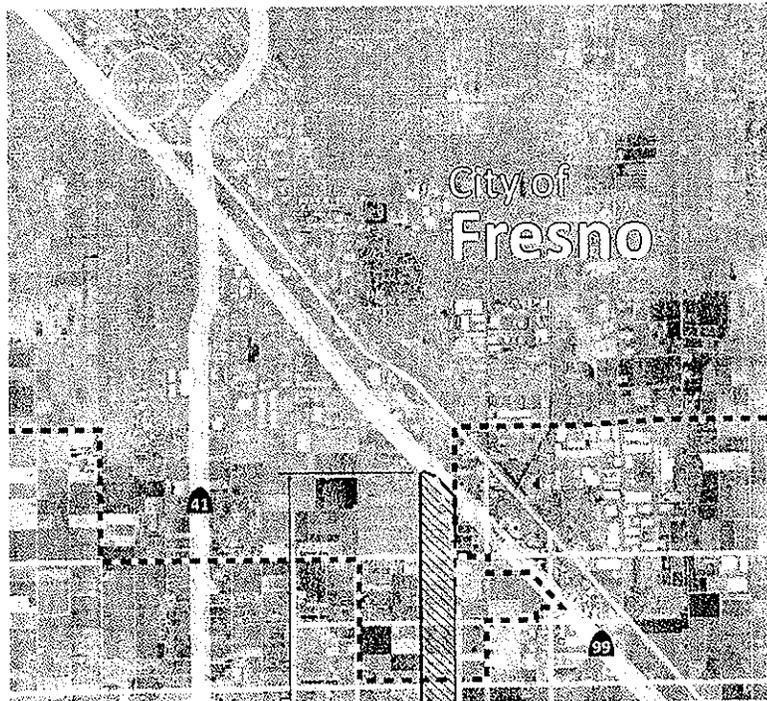
We are very pleased to offer the Authority this expression of interest and believe you will find it to be the most practical, cost-effective and efficient solution for the Authority.

Taking all the elements of our proposal together, it is clear that Fresno County citizens are ready and available to go to work to ensure the success of the California High-Speed

## SITE AREA - MAXIMUM FLEXIBILITY

Rather than limit the Authority to a single 150-acre parcel, Fresno County has instead set aside a site area encompassing nearly 700 acres adjacent to the BNSF alignment and partially within the Fresno City limits. This location starts within an area that is already zoned for heavy industrial use and extends south into rural Fresno County, avoiding properties protected by the Williamson Act, as well as avoiding significant impact to prime agricultural land.

The entire site area complies with all the Authority's stated criteria for utilities and other requirements, and poses no discernable issues that may impede development of the HMF. **The Fresno County site would also provide the Authority with an HMF at the north end of 110-miles of flat, relatively straight track, likely without any stations or other interruptions - ideal for the HSR test track.** Several conceptual layouts are provided for the Authority's consideration. There is universal support among the community behind the location. We believe this site area gives the Authority maximum flexibility in how it may wish to develop the HMF.



RESOLUTION NO. \_\_\_\_\_

**RESOLUTION SUPPORTING THE SITING AND FINANCIAL STRATEGIES NEEDED TO ESTABLISH A HIGH-SPEED RAIL HEAVY MAINTENANCE FACILITY IN FRESNO COUNTY**

WHEREAS, the voters approved Proposition 1A on November 4, 2008, which obligated \$9.85 billion for the purpose of constructing a statewide high-speed rail facility that will link San Francisco to Los Angeles as well as other California cities, including Fresno, with trains that will operate at speeds up to 220 miles per hour, and

WHEREAS, the California High-Speed Rail Authority (CHSRA) is tasked with completing final planning and environmental efforts, and as part of those efforts has determined that it will establish a Heavy Maintenance Facility in the Central San Joaquin Valley, and

WHEREAS, the CHSRA has invited interested parties to submit a Request for Expression of Interest (REIE) that will be used in identifying potential sites for planned High-Speed Train Maintenance Facilities that meet the criteria described in the REIE, and

WHEREAS, the REIE process will allow interested parties located along the proposed high-speed rail system route to express their interest in locating a maintenance facility in their community by identifying potential locations that meet the CHSRA's maintenance facility siting requirements, minimize environmental impacts, and offer financial incentives and other economic benefits to the State of California and the community; and

WHEREAS, City and County staff are proposing a partnership for the purpose of developing a competitive proposal of economic incentives in support of locating the Heavy Maintenance Facility in Fresno County; and

1 of 2  
Resolution in support of  
High-Speed Rail Maintenance  
Facility in Fresno County

WHEREAS, the County and City of Fresno have been actively engaged with other community stakeholders in identifying a potential site(s) as well as various financial incentives that could be used to attract the siting of a Heavy Maintenance Facility in Fresno County; and

WHEREAS, the location of the Heavy Maintenance Facility in Fresno County would serve as much needed stimulus to the local economy as well as creating local new jobs which will reduce the current high unemployment rate; and

WHEREAS, Fresno's Economic Development Corporation will create more than 1,500 new jobs and generate more than \$2 billion annually in economic benefit; and

WHEREAS, it is anticipated that competition for location of the Heavy Maintenance Facility from other Central Valley cities will be strong; and

WHEREAS, submission of a proposal including economic incentives in support of locating the Heavy Maintenance Facility in Fresno County will strengthen the competitive advantage for Fresno City and County; and

WHEREAS, it is vital that all financial incentives and/or other funding opportunities be available to support this effort, including those that could be used to provide needed infrastructure improvements including the use of Development Impact Fees, Measure C, as well as other transportation and/or economic development funds; and

WHEREAS, these resources would also help in addressing infrastructure improvements that will be needed to support other businesses that will be established within close proximity of the Heavy Maintenance Facility; and

NOW, THEREFORE, BE IT RESOLVED, that the Fresno City Council recognizes the economic benefits that the siting of a Heavy Maintenance Facility will provide in the region and the community and supports the use of various

2 of 2  
Resolution in support of  
High-Speed Rail Maintenance  
Facility in Fresno County

financing strategies, which will be used to successfully attract the construction of a Heavy Maintenance Facility within Fresno County. The final proposal including the economic incentives supporting the location of the Heavy Maintenance Facility in Fresno County will be presented to the City Council for approval prior to submission to the State of California.

This resolution shall take effect upon its adoption.

STATE OF CALIFORNIA )  
COUNTY OF FRESNO ) s/s  
CITY OF FRESNO )

I, BERDOUCE, KUSCH, City Clerk of the City of Fresno, certify that the foregoing resolution was adopted by the Council of the City of Fresno, at a regular meeting held on the \_\_\_\_\_ day of \_\_\_\_\_, 2009.

AYES: \_\_\_\_\_  
NOES: \_\_\_\_\_  
ABSENT: \_\_\_\_\_  
ABSTAIN: \_\_\_\_\_

Mayor Approval: \_\_\_\_\_ 2009  
Mayor Approval/No Return: \_\_\_\_\_ 2009  
Mayor Veto: \_\_\_\_\_ 2008  
Council Override Veto: \_\_\_\_\_ 2008

BERDOUCE, KUSCH  
City Clerk  
By: *[Signature]*

APPROVED AS TO FORM:  
CITY ATTORNEY'S OFFICE  
By: \_\_\_\_\_  
City Attorney

3 of 3  
Resolution in support of  
High-Speed Rail Maintenance  
Facility in Fresno County

Fresno Opinion - Fresno Editorial | Fresno Bee Page 1 of 1

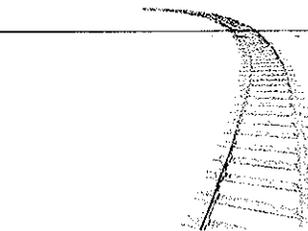
**EDITORIAL: Fresno logical site for facility**  
Maintenance operation would be major economic engine.

Fresno is a logical site for the facility, and it will provide a major boost to the economy of the Central Valley. A major economic engine from the California High-Speed Rail Authority, and it will provide a major boost to the economy of the Central Valley. A major economic engine from the California High-Speed Rail Authority, and it will provide a major boost to the economy of the Central Valley.

The location of the facility in Fresno County is a logical site for the facility, and it will provide a major boost to the economy of the Central Valley. A major economic engine from the California High-Speed Rail Authority, and it will provide a major boost to the economy of the Central Valley.

The location of the facility in Fresno County is a logical site for the facility, and it will provide a major boost to the economy of the Central Valley. A major economic engine from the California High-Speed Rail Authority, and it will provide a major boost to the economy of the Central Valley.

The location of the facility in Fresno County is a logical site for the facility, and it will provide a major boost to the economy of the Central Valley. A major economic engine from the California High-Speed Rail Authority, and it will provide a major boost to the economy of the Central Valley.



**Richard L. Harriman, Law Offices of Richard L. Harriman - November 24, 2010 (X)**

*Response to Comment X-1*

This comment infers that there are areas of controversy and issues to be resolved; however, this specific comment does not provide the specific areas of controversy or issues to be resolved. Based on Comments X-2 through X-10, the following areas of controversy and issues to be resolved have been identified for the proposed project, and therefore, the second paragraph on page S-3 of the Draft EIR is revised to read as follows:

~~There are no~~ Following are the areas of controversy and ~~or~~ issues to be resolved with the Master Plans Project.

- Roeding Park as a federally protected resource.
- Removal of trees within Roeding Regional Park
- Parking
- Traffic impacts at the Belmont Avenue/SR-99 and Olive Avenue/SR-99 interchanges
- High Speed Rail
- Air Quality
- Greenhouse gas emissions
- Compatibility of the Project Within Roeding Regional Park

*Response to Comment X-2*

The commentator asserts that Roeding Park is a federally protected resource pursuant to the Land and Water Conservation Fund Act (LWCFA), because the City of Fresno accepted a grant under the Act to refurbish tennis courts in the Park. The commentator claims to have provided an attachment to support the assertion, however, all attachments to the letter pertain to the California High Speed Rail project; it is not clear to which attachment the commentator is referring. The commentator does, however, identify a requirement in Section 6(f) of the LWCFA prohibiting property subject to the Act's protection from being "converted to other than public outdoor recreation uses."

The grant agreement incorporates the Department of Interior's standard language, indicating that:

"participant agrees that the property described in the project agreement and the dated project boundary map made part of that agreement is being acquired or developed with Land Water Conservation Fund assistance or is integral so [sic] such acquisition or development, and that, without the approval of the Liaison Officer, the Director, and/or the Secretary of the Interior, it shall not be converted to other than public outdoor recreation use but shall be maintained in public outdoor recreation in perpetuity or for the term of the lease in the case of leased property."

The City acknowledges the comment. The City intends to fully comply with this and any other applicable obligations of this grant and any other LWCFA grants. The City has been in contact with the National Parks Service to confirm that the City is taking appropriate steps to remain in compliance with the grant.

Accordingly, the project is not in conflict with, is not impacted by, and will not impact the 1980 LWCFA grant identified by the commentor.

*Response to Comment X-3*

This comment states that the City of Fresno failed to circulate the Notice of Preparation and Draft EIR to federal agencies with jurisdiction of the proposed project. The Response to Comment X-2 asserts that the U.S. Department of Interior, National Park Service has jurisdiction over future conversion of the tennis courts to other than public outdoor recreational uses. There has been no determination that approval of the Master Plans or future implementation of the Master Plans would constitute present or even future conversion. Accordingly, the basis for asserted jurisdiction has not been established. It follows, therefore, that there is no analysis under NEPA required at this time. As noted in Response to Comment X-2, the City will fully comply with all applicable LWCFA grant obligations. To this end, the City has contacted both the National Parks Service and the State Department of Parks of Recreation to review the applicable grant obligations.

*Response to Comment X-4*

This comment states that the Draft EIR failed to include the tree survey results. The results of the tree survey are provided in Chapter 5 of the Draft EIR. As discussed in Chapter 5 of the Draft EIR, ArborPro, Inc conducted a survey in 2008 and provided the location of each tree and gathered the following information: species, diameter, height, tree condition, recommended maintenance and reason for recommendation. The tree survey has been and is currently available for review at the City of Fresno, Development and Resources Management Department at 2600 Fresno Street, Fresno CA 93721-3604.

*Response to Comment X-5*

This comment states that the Draft EIR failed to disclose, analyze, and consider significant impacts to parking and provide reasonable alternatives and mitigation measures. As discussed in Chapter 9, existing daily parking demand was derived by traffic counts performed at the park entrances and exits during the peak visitor season. Based on the existing daily parking demand, future daily parking demand during the peak visitor season from buildout of the Master Plans Project was calculated. The future demand was calculated by applying a conservative 2030 annual projected growth factor of 1.94, which reflects future traffic volume growth in the project vicinity. The number of proposed onsite and offsite parking spaces were compared to the City's parking requirements. The evaluation supported the conclusion that the proposed Master Plans Project would have a less than significant impact related to the City's parking requirements. Since less than significant impacts would occur, no

mitigation measures or alternatives are required to modify the number or location of the proposed parking.

This comment also states that the Draft EIR is internally inconsistent with respect to whether there will be a reduction in the usage of the remaining “active” open space in Roeding Park. The reference to 76 acres in the Draft EIR (see page 2-17 in Chapter 2 of the Draft EIR) identifies the amount of the 100 acres of active and passive recreational area that would be public recreation/open space after the implementation of the Master Plans Project. The remaining 24 acres includes parking (9 acres), multiple purpose paths (6 acres) public access roads (5 acres), and non-public access road (2 acres), and a new PARCS maintenance facility (2 acres).

The use of the 76 acres as part of the parking evaluation is appropriate since the area that would generate a daily public parking demand is the public recreation/open space area and not the parking area, paths, roads, and PARCS maintenance facility. Employees of the PARCS maintenance facility would park at the facility and not within the public parking areas.

The reference to the 118 acres is the amount of current active and passive recreational area (123 acres of Roeding Regional Park minus the 5 acres of the PARCS maintenance facility).

*Response to Comment X-6*

This comment states that the Draft EIR failed to disclose, quantify, analyze, and consider adequately the significant adverse effects on traffic circulation at the Belmont Avenue/SR-99 and Olive Avenue/SR-99 interchanges. These two interchanges were evaluated within Chapter 8 of the Draft EIR. Potentially significant impacts were identified for both of the interchanges and mitigation measures were identified. As discussed in Impact 8.2 in Chapter 8 as well as in Chapter 22 of the Draft EIR, the level of service at the two interchanges would improve to a level of service (LOS) C or better after the implementation of mitigation measures; however, due to the uncertainty of when the interchanges would be widened by Caltrans, the project is considered to contribute to a significant impact at these interchanges. The project will still be required to pay the proportionate share of the overcrossing widening at both interchanges. The proportionate share will be the responsibility of the Fresno Chaffee Zoo Corporation.

This comment also states that the Draft EIR failed to disclose the closure of the Belmont Avenue/SR-99 interchange. Although the closure of the interchange was included as a comment by the California Department of Transportation on the Notice of Preparation, the future closure of the Belmont Avenue interchange is currently speculative. In addition, the comments received by the California Department of Transportation on the Draft EIR did not address the future Belmont Avenue closure.

*Response to Comment X-7*

This comment states that the Draft EIR failed to disclose, analyze, quantify, and consider the potentially significant adverse impacts from noise due to the High Speed Rail project. Please see

Response to Comment O-1 regarding the status of the High Speed Rail. Based on information that has been provided to the City of Fresno, there are two alternative alignments adjacent to the UPRR tracks. One alignment is located east of the UPRR tracks and the second alignment is located on the west side of the UPRR tracks. At this time the specific route and whether the HSR would be at-grade or elevated is unknown and potential impacts associated with the High Speed Rail project would require speculation.

*Response to Comment X-8*

This comment states that the Draft EIR failed to disclose, analyze, quantify, and consider the potentially significant adverse impacts from the Project's energy consumption. An evaluation of energy resources is provided in Chapter 16 of the Draft EIR. This comment states that the proposed onsite solar power system (i.e., in at least one onsite location) identified in Mitigation Measure 10.1(a) in Chapter 10 of the Draft EIR would not adequately mitigate the substantial increase in power consumed by the Master Plans Project. Impact 10.1 in Chapter 10 of the Draft EIR evaluates the project's generation of greenhouse gas emissions. As stated in Chapter 10, the proposed project would result in a potentially significant impact related to greenhouse gas emissions; however, the implementation of the recommended mitigation measures would reduce the effects to less than significant. The installation of a solar power system in at least one onsite location is one feature that is proposed to reduce greenhouse gas emissions associated with the proposed project. This proposed system is not intended to provide all of the power that is anticipated to be used by the proposed Master Plans. Mitigation Measure 10.1(a) in the Draft EIR has a number of features that could reduce greenhouse gas emissions as well as power use associated with the proposed Master Plans project. The amount of electricity and natural gas that is anticipated to be used by the proposed Master Plans is provided in Chapter 16 of the Draft EIR. The analysis in Chapter 16 provides an adequate evaluation of energy use and consumption of energy by the Master Plans project.

*Response to Comment X-9*

The commentor indicates that the impact to air quality and greenhouse gases from the removal of 811 mature trees was not evaluated in the Draft EIR.

Trees take in carbon dioxide and sequester it within the tree's structure. While it is true that the removal of trees would temporarily reduce carbon sequestration, this impact is minor. The Draft EIR states, "Minor sources (i.e., landscape emissions) are excluded from the emissions" (page 10-27 of the Draft EIR).

The commentor provides an estimate of 146 pounds per year per tree, or 59 tons of carbon dioxide removal from the 811 trees to be removed from the project. Rounding up to 100 tons would result in business as usual emissions in 2020 of 4,781 metric tons of CO<sub>2</sub>e (see Table 10-9 in the Draft EIR) and assuming no reductions, "emissions with reductions" would be 3,370 metric tons of CO<sub>2</sub>e. The percent reductions are still 30 percent in 2020. This change does not alter the significance findings in

Impact 10.1 in the Draft EIR. This is an overestimation of the potential carbon sequestration for the trees. The United States Forest Service Individual Total Tree Carbon Calculator ([http://nrs.fs.fed.us/units/urban/pubs/tools/Individual\\_Tree\\_Carbon\\_Estimator.xls](http://nrs.fs.fed.us/units/urban/pubs/tools/Individual_Tree_Carbon_Estimator.xls)) indicates that a 100 year old white pine sequesters 117 pounds per year per tree, which is less than the 146 pounds per tree provided by the commentor. Nevertheless, emissions are still less than significant.

The commentor indicates that, “the City’s voluntary participation in statewide efforts to preserve and expand urban forests as a means to mitigate climate change in support of the spirit of AB 32 is not discussed.” The project would replace trees at a ratio of 1 to 5 trees per tree removed, depending on the size of the tree (the larger the tree, the more trees would be required for planting). Therefore, the project does not conflict with the intent of the AB 32 strategy to reduce emissions.

The commentor indicates that the Draft EIR does not disclose the costs associated with the removal and/or transplanting of trees nor does it identify the funding sources. The costs associated with the removal, relocation, and/or replacing the trees is not a CEQA issue. The funds to implement the removal, relocation, and/or replacement of the trees will be the responsibility of the Fresno Chaffee Zoo Corporation and/or the City of Fresno.

The carbon stored in the trees to be removed will not be released into the air as a result of the project. Mitigation measure 10.1(c) requires a minimum of 50 percent of construction and demolition waste to be reused or recycled. Trees are relatively easy to reuse; therefore, it is likely that the majority of the trees that would be removed could be reused or recycled.

The commentor indicates that mitigation such as mitigation measure 5.2(a) is not specific in regard to the ratio of tree replacement. However, mitigation measure 5.2(a) is specific, as it indicates, “Any tree within the area of Roeding Regional Park affected by the Master Plans Project and is not currently dead or severely diseased (i.e., currently estimated at 710 trees), shall be (1) preserved at its present location; (2) relocated to another location within Roeding Regional Park; or (3) replaced by the same species of tree at a ratio of between 1.0 to 5.0 trees per tree lost, depending on the size of the tree, as identified below in Table 5-4, in Draft EIR Chapter 5, Aesthetics.” Larger trees would require more trees for replacement. The project is also replacing dead trees at the same ratio. Dead trees do not take in carbon dioxide; therefore, the project would be increasing the potential carbon sequestration for the future. In addition, the Rotary Storyland and Playland is committed to replanting 3 new trees for every tree that is removed.

The commentor indicates that the Draft EIR does not identify the potential impacts of increased micro-climate temperatures (from the initial reduction in trees) within the park and the impact of ozone formation. Although the removal of mature trees may slightly increase the temperatures in the immediate vicinity, this removal is less than significant for the following reasons: 1) literature and models are not available to identify what would constitute a significant impact; 2) the water bodies in

the park would continue to stabilize the temperatures in the park; 3) the trees would be replaced at a ratio of 1 to 5, depending on the size of the tree to be removed; and 4) mitigation measure 10.1(a) requires Energy Star labeled roof materials, solar panels, or vegetated roofs on new buildings. Energy Star roofs reflect the sunlight thereby decreasing the urban heat island effect.

The commentor indicates that no discussion regarding the potential of pollutant absorption from the trees to be removed. The Urban Forest Effects Model (UFORE) Version 1.0 Air Pollution Removal Calculator was used to estimate the pollutants removed for all the existing trees in the project area. The inputs to the program include: Area (acres) = 148; percent cover = 60 percent; study area = Fresno, California. The percent cover of the trees was estimated using aerial photography. The results are shown in Table A below. As shown in the table, the results indicate that the pollutant removal from the onsite trees is negligible. The trees to be removed absorb 0.1 tons per year of nitrogen dioxide (NO<sub>2</sub>); this addition would not change the significance findings from the air quality analysis. The temporary reduction in air pollutant removal from the trees to be replaced is less than significant.

**Table A: Pollutants Removed from Trees**

Variable	CO	NO <sub>2</sub>	Ozone	PM <sub>10</sub>	SO <sub>2</sub>
<i>All Trees on Site</i>					
Pounds per year	231	1254	4006	5297	512
Tons per year	0.1	0.6	2.0	2.6	0.3
<i>Trees to be Removed</i>					
Tons per year	<0.1	0.1	0.4	0.6	0.1
Notes: CO = carbon monoxide; NO <sub>2</sub> = nitrogen dioxide; PM <sub>10</sub> = particulate matter; SO <sub>2</sub> = sulfur dioxide Source: UFORE, Urban Forest Effects Model ( <a href="http://nrs.fs.fed.us/units/urban/pubs/tools/Air_Pollution_Removal.zip">http://nrs.fs.fed.us/units/urban/pubs/tools/Air_Pollution_Removal.zip</a> ); trees to be removed was estimated as 22 percent of the total from all trees on site (811 trees removed out of 3,714 trees).					

**Response to Comment X-10**

This comment states that the Draft EIR failed to disclose, analyze, quantify, and consider the incompatible land uses identified in the Draft EIR as active open space uses and passive commercial open space uses.

Please see Response to Comment V-12 regarding the proposed change in land use and expansion of the zoo not resulting in a land use change but simply adjusting the ratio of active to passive recreational opportunities within the existing Regional Park.

Please see Responses to Comments X-2 and X-3 regarding the U.S. Department of Interior, National Park Service.

*Response to Comment X-11*

This comment requests that the Draft EIR be revised and recirculated for public review. Based on the comments that have been received, the Draft EIR is considered to adequately evaluate the potential environmental impacts associated with the implementation of the Master Plans Project. The Draft EIR is not required to be recirculated for public review.



# County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING  
ALAN WEAVER, DIRECTOR

December 3, 2010

Kevin Fabino, Planning Manger  
City of Fresno  
Development and Resources Management Department  
2600 Fresno Street  
Fresno, CA 93721

Subject: Notice of Availability – Draft Environmental Impact Report (DEIR)  
Roeding Regional Park Facility Master Plan and  
Fresno Chaffee Zoo Facility Master Plan

Dear Mr. Fabino:

The County of Fresno appreciates the opportunity to review and comment on the City of Fresno's Notice of Availability for the above-referenced project. Staff participated in the traffic scoping for this project in 2008 and has reviewed the DEIR released on October 7, 2010. Based on our review of the document, we found the analysis to be adequate and conclude that the project will not result in impacts to County roadway facilities. We have no further comments to offer at this time.

Y-1

If you have any questions, please contact Ms. Theresa Acosta-Mena at (559) 600-4228 or email her at [tacosta-mena@co.fresno.ca.us](mailto:tacosta-mena@co.fresno.ca.us).

Sincerely,

Bernard Jimenez  
Development Services Manager

BJ:TAM:mac  
G:\4360Devs&Pin\EnvPlan\OAR\City of Fresno\Roeding Regional Park Chaffee Zoo Facility Maser PlanDEIR 2010\comment letter 12-2-10.doc

DEVELOPMENT SERVICES DIVISION

***County of Fresno Department of Public Works and Planning, Bernard Jimenez - December 3, 2010 (Y)***

*Response to Comment Y-1*

This comment stated that the County staff reviewed the Draft EIR and found that the analysis of impacts to County roadway facilities to be adequate. No further response is necessary.



Larry L. Powell  
Superintendent

# fresno county office of education

November 22, 2010

Mr. John Dugan, Director  
City of Fresno  
Development & Resources Management Department  
2600 Fresno St.  
Fresno, CA 93721



SUBJECT: Roeding Regional Park and Fresno Chaffee Zoo

Dear Mr. Dugan:

Fresno County Office of Education (FCOE) would like to take this opportunity to express its support of the Roeding Regional Park and Fresno Chaffee Zoo project that is before you. FCOE supports the project for the reasons detailed below:

FCOE is comprised of 34 school districts representing 193 elementary schools, 37 intermediate/ middle schools, 33 high schools, 47 adult school and alternative education campuses. FCOE serves over 195000 students from a wide range of ethnic groups and income levels. FCOE has a large percentage of children from below average income families. FCOE has long been committed to advancing the opportunities for its students to be exposed to the sciences and arts.

The Fresno Chaffee Zoo expansion will provide a unique learning experience for our students in our own community. The proposed Zoo expansion will provide extensive scientific, biological and arts experiences for our students many of which could not be exposed to these educational resources if not provided by the Zoo. The zoo provides disadvantaged children the opportunity to learn and recreate at the zoo. Specifically the Zoo will include new facilities, habitats, interpretive packages and programming to display the Zoo's efforts in animal conservation, science and education. Further, the Zoo, Roeding Park, Rotary Playland and Storyland provide recreational opportunities outside of the school environment in a family setting which is tremendously beneficial to our students and their families.

Z-1

Thank you for this opportunity to comment on this matter.

Sincerely,

Larry L. Powell, Superintendent

c: Mr. Scott Barton  
John Kinsey, Esq.  
Mr. Dirk Poeschel, AICP

***Fresno County Office of Education, Larry L. Powell - November 22, 2010 (Z)***

*Response to Comment Z-1*

This comment stated that the Fresno County Office of Education supports the proposed project. No specific comments on the Draft EIR were provided. No further response is necessary.

**OFFICE OF THE MAYOR**

**Victor P. Lopez**  
**633 6th Street, Orange Cove, California 93646**  
**(559) 626-4488**



November 30, 2010

Incorporated Jan. 20, 1948

Mr. John Dugan, Director  
City of Fresno  
Development & Resources Management Department  
2600 Fresno St.  
Fresno, CA 93721

SUBJECT: Roeding Regional Park and Fresno Chaffee Zoo

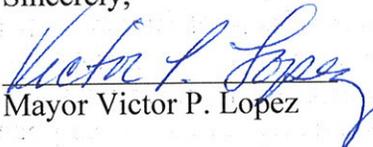
Dear Mr. Dugan:

The City of Orange Cove would like to convey its support of the Roeding Regional Park and Fresno Chaffee Zoo project that is before you. The City of Orange Cove supports the project. Per the United States Census Bureau the City of Orange Cove 2009 population was 10,668. The Median household income in 2000 was \$22,357.00 with 606 families below poverty level representing 3,431 individuals. Clearly the City of Orange Cove has a large percentage of children from below average income families. The City of Orange Cove appreciates the opportunities that Roeding Regional Park and the Fresno Chaffee Zoo offer its children and families. It is rare that our citizens have an opportunity for learning and enjoyment so close to home.

The proposed Zoo expansion will provide extensive scientific, biological and arts experiences for our students many of which could not be exposed to these educational resources if not provided by the Zoo. The Zoo provides disadvantaged children the opportunity to learn and recreate at the zoo. Specifically the Zoo will include new facilities, habitats, interpretive packages and programming to display the Zoo's efforts in animal conservation, science and education. Further, the Zoo, Roeding Park, Rotary Playland and Storyland provide important recreational opportunities outside of the school environment in a family setting.

Thank you for this opportunity to comment on this matter.

Sincerely,

  
Mayor Victor P. Lopez

cc: Mr. Scott Barton  
John Kinsey, Esq.  
Mr. Dirk Poeschel, AICP

AA-1

**A FEDERAL RURAL  
RENEWAL COMMUNITY**

***City of Orange Cove, Office of the Mayor, Victor P. Lopez - November 30, 2010 (AA)***

*Response to Comment AA-1*

This comment stated that the City of Orange Cove supports the proposed project. No specific comments on the Draft EIR were provided. No further response is necessary.

# Garces Memorial High School

*Excellence in Catholic Education*

www.garces.org



November 30, 2010

Mr. John Dugan, Director  
City of Fresno  
Development & Resources Management Department  
2600 Fresno St.  
Fresno, CA 93721



SUBJECT: Roeding Regional Park and Fresno Chaffee Zoo

Dear Mr. Dugan:

My name is John Fanucchi. I am the President of Garces Memorial High School. As a long time educator, I would like to take this opportunity to express my support of the Roeding Regional Park and Fresno Chaffee Zoo project that is before you.

The Fresno Chaffee Zoo expansion will provide a unique learning experience for students of all ages in the San Joaquin Valley. The proposed Zoo expansion will provide extensive scientific, biological and arts experiences for students who may not otherwise be exposed to these educational resources if not for this project. It is my understanding that the zoo expansion will include new facilities, habitats, interpretive packages and programming to display the Zoo's efforts in animal conservation, science and education.

BB-1

Thank you for this opportunity to comment on this matter.

Sincerely,

*John L. Fanucchi*

John L. Fanucchi, President

cc: Mr. Scott Barton  
John Kinsey, Esq.  
Mr. Dirk Poeschel, AICP

***Garces Memorial High School, John L. Fanucchi - November 30, 2010 (BB)***

*Response to Comment BB-1*

This comment stated that the Garces Memorial High School supports the proposed project. No specific comments on the Draft EIR were provided. No further response is necessary.



## SECTION 4: ERRATA

The following are revisions to the Draft EIR for the Roeding Regional Park and Fresno Chaffee Zoo Facility Master Plans. These revisions are minor modifications and clarifications to the document, and do not change the significance of any of the environmental issue conclusions within the Draft EIR. The revisions are listed by page number. All additions to the text are underlined (underlined) and all deletions from the text are stricken (~~stricken~~).

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### Changes in Response to Specific Comments

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#### Chapter S - Summary

##### Page S-3

The second paragraph on page S-3 of the Draft EIR is revised to read as follows:

~~There are no~~ Following are the areas of controversy and ~~or~~ issues to be resolved with the Master Plans Project.

- Roeding Park as a federally protected resource.
- Removal of trees within Roeding Regional Park
- Parking
- Traffic impacts at the Belmont Avenue/SR-99 and Olive Avenue/SR-99 interchanges
- High Speed Rail
- Air Quality
- Greenhouse gas emissions
- Compatibility of the Project Within Roeding Regional Park

#### Chapter 2 - Project Location and Description

##### Page 2-42

The following is added under Subsequent Approval at the bottom of page 2-42 of the Draft EIR.

##### Zoo Authority

##### Funding Authorization

The Zoo Authority is the Joint Authority made up of public, City and County representatives which receives and allocates the Measure Z monies. The Authority will be required to authorize and allocate monies for the construction of the capitol projects associated with the proposed Master Plans Project.

## Chapter 4 - Cultural Resources

### Page 4-20

The second paragraph on page 4-20 of the Draft EIR is revised as follows to clarify where the relocated trees from Umbrella and Palm Point groves will be placed.

The demolition of the Umbrella and Palm Point Groves will result in the removal of contributing historic landscape features within the historic district and will diminish the network of seven historic picnic groves within the park. The Umbrella Grove is one of the original four picnic groves constructed in the park in 1907. The Palm Point Grove was constructed in circa 1946, at the beginning of a campaign that added three additional picnic groves to the park. Together, these important historic features create a network of picnic groves throughout the park, which contribute to the park's historic character as a vegetated pleasure ground. The picnic groves also provide much needed shade in the hot summer climate and contribute to the bucolic character of the park's landscape. Although the Master Plans Project includes the demolition of two historic picnic groves, the other five historic groves will be preserved, including three groves constructed in 1907 and two constructed in the late 1940s. Several trees from the Umbrella and Palm Point groves will be relocated to the proposed re-forestation area located north of Storyland and immediately east of State Route 99. The preservation of the five historic picnic groves under the Master Plans Project will maintain the other areas of the park, and overall the network of historic picnic groves, will still be present upon completion of the Master Plans Project. With the incorporation of the design revision, The demolition of the Umbrella and Palm Point Groves would not adversely affect the overall ability of the historic district to convey its significance nor would it affect the district's eligibility for listing in the California Register of Historical Resources.

### Page 4-21

To clarify the intent of Mitigation Measure 4.1(a) (see Response to Comment O-6 for a change in mitigation measure numbering), this measure on page 4-21 of the Draft EIR is revised as shown below.

**4.1(a)**                    Maintain the public recreational uses associated with the ponds by introducing a new pond feature in accordance with Mitigation Measure 4.8(a), which states that historic preservation design guidelines shall be developed that address new design in the context of the contributing architectural and landscape features of the potential historic district. A new pond feature shall be located near the Golden State Boulevard entry to the park, such that the pond feature is at least visible and as accessible as they are in their current location. Historic American Landscape Survey (HALS) documentation of the ponds shall be prepared by a qualified historic preservation professional prior to the demolition of the ponds. The Zoo will

consult with the California Department of Fish and Game (CDFG) and will stock the pond feature with fish species recommended by CDFG. ~~Vegetation shall be installed around the ponds to recreate the existing character of the ponds, including lawn area for picnicking, and a mature tree canopy.~~

The following is added as an additional mitigation measure for Impact 4.1 on page 4-21 of the Draft EIR; however, the finding of less than significant after mitigation is the same with or without the following mitigation measure.

- 4.1(b)** Prior to the completion of the improvements schedule for 2014 or before, Fresno Chaffee Zoo shall rehabilitate the Pergola and the Lisenby Bandstand according to the Secretary of the Interior's Standards for Rehabilitation. If feasible, the Lisenby Bandstand will be accessible to the public.

#### Page 4-22

To ensure adequate documentation of the Zoo Administration Office is provided, Mitigation Measure 4.2 on page 4-22 of the Draft EIR is revised as follows.

- 4.2** Relocate the Fresno Chaffee Zoo Administration Office within the boundaries of the historic district that is consistent with its historic setting. Consistency with the historic setting shall be determined by a city-approved historian. Historian American Building Survey (HABS) documentation shall be prepared for the Administration Office by a qualified historic preservation professional prior to relocation.

#### Page 4-27

To clarify the timing for the development of the historic preservation guidelines as well as clarify the intent of the guidelines, Mitigation Measure 4.8(a) on page 4-27 is revised as follows.

- 4.8(a)** Prior to the approval of grading plans to construct new non-contributing features within the potential Roeding Park Historic District, develop historic preservation design guidelines that address new design in the context of the contributing architectural and landscape features of the potential historic district. The historic preservation design guidelines shall be prepared by a qualified historic preservation professional.

The first paragraph under Mitigation Discussion on page 4-27 of the Draft EIR is revised as follows.

**Mitigation Discussion:** No mitigation is legally required because this impact on the historic district is less than significant without mitigation. Furthermore, the master plans reference the retention of existing park horticultural and architectural themes where possible. The

Master Plans Project includes a Campus Ecology Strategies section, outlined on page 18 of the Roeding Regional Park Facility Master Plan. These strategies include provisions for the development of “a comprehensive landscape plan that, wherever possible, seamlessly incorporates existing park and zoo trees and features into the landscape design for the campus.” This strategy is open ended and further detail should be included to provide guidance for the treatment of all contributing features of the historic district (landscape and architectural) to ensure minimal impact of new construction upon the historic district. These Campus Ecology Strategies should serve as a guide for all new construction to ensure minimal impact to the contributing features of the historic district and implementation of these strategies for the entire Master Plans Project. The master plans preserve in place the two contributing features within the Zoo, the Lisenby Bandstand, and the Zookeeper’s House. Based on discussions with the National Trust for Historic Preservation and California Preservation Foundation, Chaffee Zoo Corporation will also rehabilitate the Lisenby Bandstand and Zookeeper’s House in conformance with the Secretary of Interior Standards for Rehabilitation.

**Page 4-28**

Mitigation Measure 4.8(b) on page 4-28 of the Draft EIR is revised as follows:

- 4.8(b)** Prior to the approval of landscape plans, ~~Utilize~~ the historic plant palette and theme shall be utilized for the introduction of new landscape elements.

**Chapter 5 - Aesthetics**

**Pages 5-26 and 5-27**

Mitigation Measure 5.2(a) on pages 5-26 and 5-27 of the Draft EIR has been modified as shown below.

- 5.2(a)** Any tree within the area of Roeding Regional Park affected by the Master Plans Project and is not currently dead or severely diseased (i.e., currently estimated at 710 trees), shall be (1) preserved at its present location; (2) relocated to another location within Roeding Regional Park; or (3) replaced by the same species of tree at a ratio of between 1.0 to 5.0 trees per tree lost, depending on the size of the tree, as identified below in Table 5-4.

In addition, any tree within the area of Roeding Regional Park affected by the Master Plans Project and is currently dead or severely diseased (i.e., currently estimated at 101 trees), shall be replaced by the same species of tree at a ratio of between 1.0 to 5.0 trees per tree lost, depending on the size of the tree, as identified below in Table 5-4.

**Table 5-4: Roeding Regional Park Tree Replacement Ratios**

Height (in feet)	Tree Breast Height Diameter (in inches)					
	0"-6"	7"-12"	13"-18"	19"-24"	25"-30"	30"+
0'-15'	1.0	1.0	1.5	2.0	2.5	3.0
16'-30'	1.0	1.5	2.0	2.5	3.0	3.5
31'-45'	1.5	2.0	2.5	3.0	3.5	4.0
46'-60'	2.0	2.5	3.0	3.5	4.0	4.5
61'+	2.5	3.0	3.5	4.0	4.5	5.0

Source: ArborPro, Inc.

A landscape plan shall be prepared in consultation with a certified arborist. The size of the replacement trees will be determined by the landscape architect and approved by the Development and Resources Management Department. After installation of the relocated and replacement trees, periodic monitoring shall occur to ensure the survival of the trees. For trees that are relocated and do not survive within the first two years of replacement, these trees shall be replaced by the same species of tree at the ratio shown in Table 5-4. For replacement trees that do not survive within the first two years of replacement, these trees shall be replaced by the same species of tree.

Subsequent to the first two years of replacement or relocation, there shall be a periodic maintenance of the trees. A maintenance plan shall be prepared by a certified arborist and include pruning, fertilization, irrigation, and pest management to maintain the health of the trees.

**Page 5-33**

The following is added as the first source on page 5-33 of the Draft EIR.

Arbor Pro, Inc. No Title. Collection of tables and exhibits that provide information about the existing trees within Roeding Regional Park. 2009.

**Chapter 6 - Biological Resources**

Mitigation Measure 6.2(a) on page 6-11 of the Draft EIR is revised as follows:

- 6.2(a)** Within 30 days prior to the commencement of restoration work on the bandstand, a qualified bat biologist shall conduct a habitat assessment and daytime survey of the bandstand. If no evidence of current bat habitation by the pallid bat or the Townsend’s big-eared bat is found, no further action is

required. If bat use is noted, then a qualified biologist shall prepare a report that makes recommendations for appropriate measures that will prevent harm to sensitive species of bats. These measures may include exclusion and humane eviction of bats roosting within the structure, partial dismantling of the structure to induce abandonment by bats, or other appropriate measures in coordination with and as approved by CDFG. If the measures are planned to be implemented between September 1 and September 30, no further action is required. If the measures are planned to be implemented during the breeding season (October 1 through August 31), coordination and approval by CDFG is required. The recommended measures shall be incorporated into and implemented as part of the bandstand restoration.

## Chapter 8 - Transportation/Traffic

### Page 8-23

Mitigation Measure 8.4(a) on page 8-23 is revised as follows.

- 8.4(a)** The project applicant shall construct a vandal resistant fence along the east side of Golden State Boulevard from Olive Avenue to Belmont Avenue undercrossing, within the right-of-way, to prevent pedestrians from crossing the railroad tracks at mid-block locations.

The following measures are added after Mitigation Measure 8.4(a) on page 8-23 of the Draft EIR.

- 8.4(b)** The project applicant shall install a sidewalk on the south and north sides of the Olive Avenue at-grade railroad crossing.
- 8.4(c)** The project applicant shall install a Standard 8 warning device (flashing lights without a gate) in the off-quadrant due to the skewed track configuration of the crossing.

## Chapter 10 - Air Quality

### Page 10-27

The fourth full paragraph on page 10-27 in Chapter 10 of the Draft EIR is revised to read as follows:

There is no approved greenhouse gas emission reduction plan or program for the project. ~~In addition,~~ However, the SJVAPCD's "Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA" states that development projects that reduce GHG emissions by 29 percent, compared to business as usual, would be considered to have a less than cumulatively significant impact on global change. ~~has not yet provided best performance standards for this type of project. Therefore, the project would need to reduce greenhouse gas emissions by 29 percent compared with business as usual.~~ This reduction in

GHG emissions can be taken through project design features, mitigation measures in other impact areas, greenhouse gas mitigation measures, and future regulations.

## Chapter 14 - Hydrology and Water Quality

### Page 14-10

The following is added as an additional mitigation measure for Impact 14.2 on page 14-10 of the Draft EIR.

- 14.2(b)**            The Fresno Chaffee Zoo shall coordinate with the City and the Fresno Metropolitan Flood Control District to implement a relief system for the proposed storm drainage facility. The relief system will include the installation of a siphon at the southeast corner of the proposed basin (i.e., at the intersection of Franklin Avenue and Pacific Avenue) and installation of a pipeline approximately 500 feet in the Franklin Avenue right-of-way to the existing underground Fresno Metropolitan Flood Control District (FMFCD) pipeline located at the intersection of Franklin Avenue and Humboldt Avenue. The relief system shall be subject to approval by the FMFCD.



**Attachment A:  
City Correspondence to Office of Historic Preservation**





## Development and Resource Management

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2600 Fresno Street, Third Floor, Room 3065  
Fresno, California 93721-3604  
(559) 621-8003, FAX (559) 498-1012

**John M. Dugan, AICP**  
Director

December 6, 2010

Ronald Parsons, Historian I  
State of California-The Resource Agency  
Office of Historic Preservation  
Department of Parks and Recreation  
1725 23<sup>rd</sup> Street, 100  
Sacramento, California 95816-7100

Dear Mr. Parsons:

The City of Fresno and Fresno Chaffee Zoo Corporation would like to thank you for taking the time to discuss the Office of Preservation comment on the Draft Environmental Impact Report (DEIR) for the Roeding Regional Park Facility Master Plan and Fresno Chaffee Zoo Facility Master Plan.

Our goal was to gain a greater understanding of the Office's perspective regarding substantial adverse changes to the environment through physical demolition, relocation, or alteration associated with this specific project, as stated in the letter dated November 24, 2010. Through our conversation we learned that the role of your Office is not to facilitate or opine on mitigations, but to leave that conversation to the local jurisdiction and constituency. We appreciate your position.

We also appreciated your supportive comments related to our efforts to encourage public discussion as we are following the CEQA Guidelines. We specifically discussed our genuine interest in reaching out to and working with the HALS Northern CA Chapter, National Trust For Historic Preservation, Western Office and the California Preservation Foundation. Again, we appreciate your supportive commentary.

We would also like to again extend an invitation to tour the Fresno Chaffee Zoo during your next visit to Fresno. Please do not hesitate to contact me or Scott Barton, Chief Executive Officer, Fresno Chaffee Zoo Corporation (498-5910) if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Fabino".

Kevin Fabino, Planning Manager  
City of Fresno  
Development and Resources Management Department

Cc: Scott Barton, CEO  
Milford Wayne Donaldson, FAIA



## **Attachment B: Supplemental Historical Analysis**



ROEDING PARK HISTORIC DISTRICT  
RESPONSE TO DEIR COMMENTS

FRESNO, CA  
[08128B]

Prepared for  
CITY OF FRESNO





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## INTRODUCTION

This document responds to comments received by the City of Fresno regarding the Draft Environmental Impact Report (DEIR) issued in November of 2010. The DEIR analyzed the impact of the Roeding Park and Fresno Chaffee Zoo Master Plans (the Project), on the proposed Roeding Park Historic District (the District). The Project includes renovation of Roeding Park, the Fresno Chaffee Zoo Rotary Storyland and Rotary Playland, as well as expansion of the zoo.

The following groups submitted comments: California Native American Heritage Commission (CNAHC); California Office of Historic Preservation (OHP); Historic American Landscape Survey, Northern California Chapter (HALS); Fresno Historic Preservation Commission; the Western Regional Office of the National Trust for Historic Preservation (NTHP); and California Preservation Foundation (CPF). On December 8, 2010, the Roeding Park Project team, which was comprised of representatives from the City of Fresno, the Fresno Chaffee Zoo, and historic preservation consultants Page & Turnbull, met with representatives from NTHP and CPF to discuss their comments. This document responds to their requests for additional analysis of: the potential cumulative effects of the Project; the definition of the proposed historic district; the historic status and integrity of the ten (10) contributing features that would be potentially impacted by the Project; and the proposed mitigation measures.

“Part I: Potential Cumulative Impacts” addresses the potential cumulative effects of the Project. The Project and the District are more explicitly defined to analyze cumulative effects.

“Part II: Historic District Analysis” describes the Project and evaluates the historic significance and integrity of the District post-Project to determine if the District would retain its status as a historic resource. A Historic District Boundary Map on page 10 of the Historic Resource Assessment (HRA) completed by Page & Turnbull in 2008 identifies the contributing and non-contributing portions of the park. Although the proposed project would potentially impact ten contributing features within the District, the remaining portion of the District would retain its historic significance and integrity as a historic resource. The District represents a cultural landscape with interconnected features and characteristics that support its historic significance and setting; the significance of the District is not defined by its collection of individual contributing features. The landscape of the District (rather than the contributing buildings, structures and objects) is the most important and definitive characteristic. As outlined on page v of the HRA:

“Character-defining cultural landscape characteristics for the [proposed] Roeding Park Historic District include: its organization of a series of open spaces, made accessible via vehicular and pedestrian circulation systems, and accentuated by buildings, structures, vegetation and small-scale features, which frame the overall historic character of the property.”

Contributing features within the District may contribute to the historic significance and integrity of the District, but may not be integral to the significance of the overall cultural landscape.

In “Part III: Individual Contributing Features Analysis,” historic significance and integrity evaluations were completed for the ten (10) contributing features for which a potential impact was identified in the DEIR. In this document, the ten (10) contributing features are:

- 1) Ponds (A, B, C, and D);
- 2) Umbrella Grove;
- 3) Palm Point Grove;
- 4) Fresno Chaffee Zoo Administrative Office;
- 5) George Washington Memorial;
- 6) Lake Washington (no impact identified);
- 7) George C. Roeding Memorial;
- 8) Frederick and Marianne Roeding Monument;
- 9) Concrete Benches; and,
- 10) The Circulation Patterns.

Of note, in this resource count, the four Ponds are grouped together as a single feature rather than counted as separate resources, as they were in the DEIR. The Ponds were recorded on a single DPR523A form in the HRA because the contributing features are each significant as passive water features representative of early twentieth century municipal park design, retain similar historic integrity, and are geographically located grouped in the District. Therefore, the Ponds are grouped for the purposes of this supplemental evaluation. Unlike the Ponds, the groves (Umbrella and Palm) and the memorials (George Washington, George C. Roeding, and Frederick and Marianne Roeding Monuments) remain listed as individual contributing features in this document. These contributing features were evaluated on separate DPR523A forms because they are unique features interspersed throughout the District. The circulation patterns are discussed in the HRA as an important landscape characteristic, but are not a countable feature according to the National Register Bulletins. Because the proposed project affects the park’s circulation patterns, they are discussed here as a contributing feature. The grouping of the Ponds as a single contributing feature and the addition of the circulation features brings the District resource count to twenty-three (23) contributing features and twenty-two (22) non-contributing features for the purposes of this study.

Part III does not include analysis of the proposed project on the Zookeeper’s House, a contributing feature, because the proposed project would remove non-historic additions to the building. Removal of the non-historic additions would restore the contributing feature and is not an adverse impact.

“Part IV: Mitigation Measures” introduces additional mitigation measures that would reduce the affects of the Project. These measures were drafted in response to comments and correspondence with the National Trust for Historic Preservation (NTHP) and the California Preservation Foundation (CPF). These mitigations measures could be implemented in addition to those identified in the DEIR.

## **PART I: POTENTIAL CUMULATIVE IMPACTS**

The comments expressed concern that the Project would cause adverse cumulative effects because ten (10) contributing features within the District would be affected by the Project. The comments asserted that these changes would result in a significant adverse cumulative impact to the historic district. While there are many components of the proposed project, there is only one (1) Project being evaluated, and that the project would potentially impact only one (1) historic resource—the District. The Project represents one action and would potentially impact one historic resource, the District, which is comprised of contributing resources. The Project would potentially affect ten contributing features which contribute to the District; however, because these actions are being

evaluated collectively relative to the District as a whole—rather than the individual contributing features—the Project does not represent a cumulative impact as defined by CEQA. The Project is not indicative of trends to further develop the District, nor is the Project proposed in conjunction with development projects located within the immediate vicinity of the District. Therefore, although adverse effects would result from the Project, the Project does not constitute cumulative impacts.

## **PART II: HISTORIC DISTRICT ANALYSIS**

### **SIGNIFICANCE AND INTEGRITY OF THE HISTORIC DISTRICT**

According to the National Park Service “a [historic] district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”<sup>1</sup> Historic districts are not collections of individually significant features; instead districts are made up of components which achieve significance when grouped together. Districts must work together to tell the story of their significance and must have distinguishable boundaries. The proposed Roeding Park Historic District (the District) is significant for its landscape and concentration of significant buildings, structures, and objects. The District contains twenty-three (23) contributing features (note that the four ponds represent a single contributing feature and the circulation patterns are included in this count) and (22) twenty-two non-contributing features. The landscape and its characteristics unify the District and are stronger than the contributing features within the park.

The District is eligible for listing in the National Register of Historical Resources under Criterion A for community planning and development themes because of its significant contribution to the development of municipal parks in California in the early twentieth century. The District is also eligible under Criterion C as a resource that embodies the distinctive characteristics of early twentieth century municipal parks.

The designed landscape defines the overall setting of the District. Character-defining cultural landscape features of the District include: the series of open spaces within the park made accessible by vehicular and pedestrian circulation systems and buildings, structures, vegetation, and small-scale features which frame the overall historic character of the property. The character-defining features were designed in response to the site’s topographical conditions, natural systems and features, and program concerns. Individual contributing features of the proposed Roeding Park Historic District are outlined on pages 5 and 6 of the Historic Resource Assessment (HRA, Page & Turnbull, July 31, 2009).

Historical records—including local newspaper articles, building permits, and park archives—indicate that there were several alterations to the contributing features of the District both during its period of significance (1903 to 1953) as well as after. The layout of the District was modified to accommodate recreational, vehicular and contemporary improvements. For example, roads were widened and re-routed as the zoo and other areas of the park expanded and changed, and features were added and subtracted as the desire for monuments, structures, and other park features were realized. Despite these incremental changes, the overall character of the park’s natural systems and features, spatial organization, circulation, topography, vegetation, buildings and structures, and small-scale features has remained intact since the period of significance; and therefore, the property retains integrity of location, design, setting, materials, workmanship, association and feeling. The proposed

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<sup>1</sup> National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, (Washington, D.C.: U.S. Department of the Interior, Rev. 1997): 5.

Roeding Park Historic District retains integrity to convey its significance throughout the period of significance (1903 to 1953).

### PROPOSED PROJECT SUMMARY

As outlined in the “Illustrative Roeding Park Facility Master Plan, Revised June 2009,” the proposed project involves construction of: a Golden State Boulevard entry gate; a new park boulevard; parking; a new storm water storage facility; a park plaza and show gardens; a great lawn; a new dog park; a pedestrian promenade and hubs. The Project also includes relocation of the park maintenance yard; installation of new water, sewer, gas and electricity services to the park; roadway improvements; and perimeter fencing and landscaping.

The Fresno Chaffee Zoo would be expanded from 18 to 39 acres to accommodate construction of new exhibits and amenities, a new zoo promenade, an entry village and administration office, and a main event hub.

Proposed improvements to Rotary Playland include: a new Ferris wheel, a roller coaster, smaller rides and attractions, a new concession area, a picnic and event space, and an expanded train loop and train station.

Proposed improvements to Rotary Storyland include: a new mini-golf area, new exhibits and attraction zones, an expanded amphitheater, and a new entry gateway.

### PROJECT IMPACTS SUMMARY

The proposed project would demolish three (3) contributing features; relocate five (5); and alter one (1). No impact to Lake Washington was identified. While the relocated and altered features would be affected by the Project, they would still contribute to the District after the completion of the Project. Thirteen (13) contributing features would not be affected by the Project. A detailed matrix of the proposed project’s effects on the features of the proposed historic district is included in the appendix of this document.

#### Demolition

Three Contributing Features:

- 1) Ponds A, B, C, and D;
- 2) Umbrella Grove;
- 3) Palm Point Grove.

Nine Non-Contributing Features:

- 1) City Maintenance Yard;
- 2) Elephant House;
- 3) Seal Pool;
- 4) Monkey Island;
- 5) Giraffe Barn;
- 6) Bear Grottoes;
- 7) Walk-through Aviary;
- 8) Ape Grottoes;
- 9) Hippo Exhibit.

#### Relocation

Five Contributing Features:

- 1) Fresno Chaffee Zoo Administration Building,
- 2) Historic concrete benches,

- 3) George C. Roeding Memorial,
- 4) George Washington Memorial, and
- 5) Frederick and Marianne Roeding Monument.

### Alteration

One Contributing Feature:

- 1) Circulation patterns.

Six Non-Contributing Features:

- 1) Rotary Storyland;
- 2) Rotary Playland;
- 3) Lion House;
- 4) Amphitheater;
- 5) Palm Point Picnic Shelter;
- 6) Rhino Exhibit.

### Restoration

One Contributing Feature:

- 1) Zookeeper's House (Chaffee Office) (removal of non-historic additions; this action would restore the integrity of the house and is not a potentially significant impact, and therefore is not discussed further in this document)

### New Construction

- Extension of zoo perimeter fencing,
- Parking,
- Circulation and infrastructure improvements;
- New landscapes;
- Landscape Improvements;
- Park open space;
- Dog park;
- Park plaza;
- Picnic groves; and
- Play zone.

The Project would retain 20 of the district's 23 contributing features, would rehabilitate many existing landscape features, and would improve the infrastructure system to facilitate new and improved recreational use of the site. The Project would demolish or significantly remodel non-contributing features, such as exhibits in the zoo, Storyland, and Playland; however, non-contributing features do not support the themes for which a historic district is significant. Therefore impacts to these non-contributing features do not constitute a significant adverse impact to the proposed District. New buildings, structures, and landscape elements would be constructed, primarily for infrastructure improvements. As designed, the new construction would follow the trend of the existing architectural and horticultural character of the historic district; therefore, the proposed improvements would not dramatically alter the setting associated with contributing features, nor substantially alter the architectural or horticultural character of the District.

If the Project was implemented, the District would retain its status as a historic resource. The features which contribute to the historic significance of the District would remain: the unifying, designed landscape characterized by a series of open spaces accessed by vehicular and pedestrian circulation systems and the buildings, structures, vegetation and small-scale features. Roeding Park

would continue to convey its significance as a municipal park designed in the early twentieth century. Therefore, the Project would not cause a substantial adverse change to a historic resource because it would not impact the eligibility of the Roeding Park Historic District for listing in the National Register.

### PART III: CONTRIBUTING FEATURES ANALYSIS

This section addresses the individual historic significance and integrity of the ten (10) contributing features within the park that would be potentially demolished or altered as part of the proposed project. The individual significance of the following features—all of which are contributing features of the Roeding Park Historic District—will be discussed:

- 1) Ponds A, B, C and D
- 2) Umbrella Grove
- 3) Palm Point Grove
- 4) Fresno Chaffee Zoo Administrative Office
- 5) George Washington Memorial
- 6) Lake Washington
- 7) George C. Roeding Memorial
- 8) Frederick and Marianne Roeding Monument
- 9) Concrete Benches
- 10) Circulation Patterns

The Roeding Park Historic District is significant because it represents the evolution of parks from picturesque urban pleasure grounds to recreation-centered facilities with multiple attractions in the early- to mid-twentieth century. The District possesses characteristics of the early twentieth century municipal park typology: curvilinear pathways, expansive lawns, groves of trees, picnic areas, architectural elements such as pergolas, and facilities for recreational and cultural activities such as tennis, baseball, outdoor concerts, and folk dancing.

The proposed Roeding Park Historic District is a dynamic cultural landscape comprised of both evolving and static contributing features. The landscape is the unifying element of the proposed District. The living components of the landscape, its trees and other vegetation, have matured since the initial design of the park in 1903. These living landscape features were expected to grow and mature as the park aged. The static contributing features of the District—the objects, buildings and structures—are significant for their original design in the park. The static contributing features of the District are significant for their original design; they contribute to the District because their design reflects the development of early twentieth century municipal parks. Unlike the living features of the landscape, the alterations to the static contributing features that weaken the representation of the original park design lessen the integrity of those features. The *National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscape* was used to evaluate the integrity of the contributing features and the overall landscape character of the proposed Roeding Park Historic District.

The contributing features listed above contribute to the proposed Roeding Park Historic District because they support the arboretum-like landscape, which is the unifying element within the District. The curvilinear circulation was meant to create a meandering experience within the park's designed landscape, and is an essential part of the park's arboretum feeling. Ponds A-D, the Umbrella Grove, the Palm Point Grove, and the concrete benches provided an important passive recreational use within the park by creating gathering spaces for sitting, picnicking, fishing, and relaxing. The construction of a large water feature like Lake Washington continued the trend of picturesque designed landscapes, and also represented the contributions of the Works Progress Administration (WPA). The Zoo Administration Office (circa 1937) was an example of the support buildings designed for municipal parks during this era. The George Washington Memorial, George C. Roeding Memorial, and Frederick and Marianne Roeding Monument all represent the park's commemorative period, during which monuments were erected throughout the park. The contributing features are

significant for their representation of early twentieth century municipal park design; however, individually, the contributing features do not reflect this theme.

The contributing features retain sufficient integrity to be support the themes of the proposed District but do not retain sufficient integrity to eligible for the National Register as individual historic resources. The contributing features retain sufficient integrity to support the significant themes of the District because most of these alterations to the features occurred during the District's period of significance (1903-1953). To be individually eligible for the nomination to the National Register, the contributing features would need to retain historic significance as early twentieth century municipal park design features; however, the alterations made during the District's period of significance have weakened the integrity of the original design for which the features would be individually significant.

The contributing features would need a higher level of historic significance and integrity to be individually eligible for listing on the National Register.

The following information about the ten (10) contributing features potentially impacted by the Project is provided in the appendix of this document:

- An outline of the history and evolution of the feature;
- A detailed assessment of the contribution of the feature to the District;
- An evaluation of the contributing feature as a potential individual, rather than a contributing, historic resource.

## **PART IV: MITIGATION MEASURES**

In response to the concerns raised by the National Trust for Historic Preservation (NTHP) and California Preservation Foundation (CPF) regarding contributing features, Page & Turnbull outlined mitigation measures which could be added to the EIR to mitigate impacts to district.

- Rehabilitate the Pergola according to the *Secretary of the Interior's Standards for Rehabilitation*.
- Rehabilitate the Lisenby Bandstand according to the *Secretary of the Interior's Standards for Rehabilitation*. If feasible, make the Lisenby Bandstand accessible to the public.
- Reintroduce ponds or similar water features within the boundaries of Roeding Park. These features should not be conjectural and should not physically replicate the historic ponds that would be demolished as part of the proposed project. In the tradition of the historic ponds, the new water features would allow recreational uses including fishing, and picnicking.
- Develop and implement a re-forestation program for the historic picnic groves. When mature heritage trees are removed, introduce new trees that are of sufficient size to blend with the mature, existing tree canopy.
- Consult with a qualified historic preservation professional while carrying out all rehabilitation work within the District. A qualified historic preservation professional is defined as an individual meeting the Secretary of the Interior's Professional Qualification Standards for History, Architectural History or Historic Architecture.
- Prepare appropriate Historian American Building Survey (HABS) or Historic American Landscape Survey (HALS) documentation prior to the demolition of historic features. This documentation should be completed by a qualified historic preservation professional.
- Consult with a qualified historic preservation professional to develop historic preservation design guidelines that address the treatment of all contributing architectural and landscape features of the historic district (outlined in the Roeding Park Historic Resource Assessment,

dated July 31, 2009), to be submitted to and approved by the City of Fresno, Development and Resource Department.

## APPENDIX: DETAILED CONTRIBUTING FEATURES ANALYSIS

Detailed information is provided below about the contributing features of the proposed Roeding Park Historic District (the District) that will be potentially affected by the proposed project (the Project). This information is meant to supplement the Historic Resource Assessment (HRA, Page & Turnbull, July 31, 2009). For each of the ten (10) resources identified in the letter that would be potentially impacted by the Project, the following information is provided:

- An outline of the history and evolution of the feature;
- An assessment of the contribution of the resource to the District;
- An evaluation of the resources as an individual, rather than a contributing, historic resource.

### I. PONDS

The Roeding Park ponds were constructed circa 1907 and were an important feature of the original landscape design of the park. The curvilinear ponds are contained by concrete curbing and set beneath a mature tree canopy. The ponds feature landscaped islands with large shade trees and footbridges; some have fountains. The ponds provide important passive recreational uses within the park including picnicking, fishing, and relaxing. Throughout their history, the shape, size and number of ponds have changed. The ponds began as “two bodies of water divided by a driveway/esplanade...facing the park entrance”<sup>2</sup> (see Figure 1). In 1913, the park contained three ponds and in 1914 the ponds were enlarged.<sup>3</sup>



Figure 1: Early view of Roeding Park ponds, 1907. (Fresno Historical Society)

<sup>2</sup> “Roeding Park is Called Boston Common of Fresno” *Fresno Morning Republican* (Dec. 8, 1907).

<sup>3</sup> “Embellishment Work Proposed at Roeding Park Contemplates a \$50,000 Bonded Indebtedness” *Fresno Morning Republican* (July 20, 1913); “Roeding Park to be opening in Spring as Picnic Resort: Commissioners Consider many Improvements in Property” *Fresno Morning Republican* (Oct. 9, 1914).

As shown in the period plans below (Figures 2 and 3), the number of ponds increased to four by 1937.

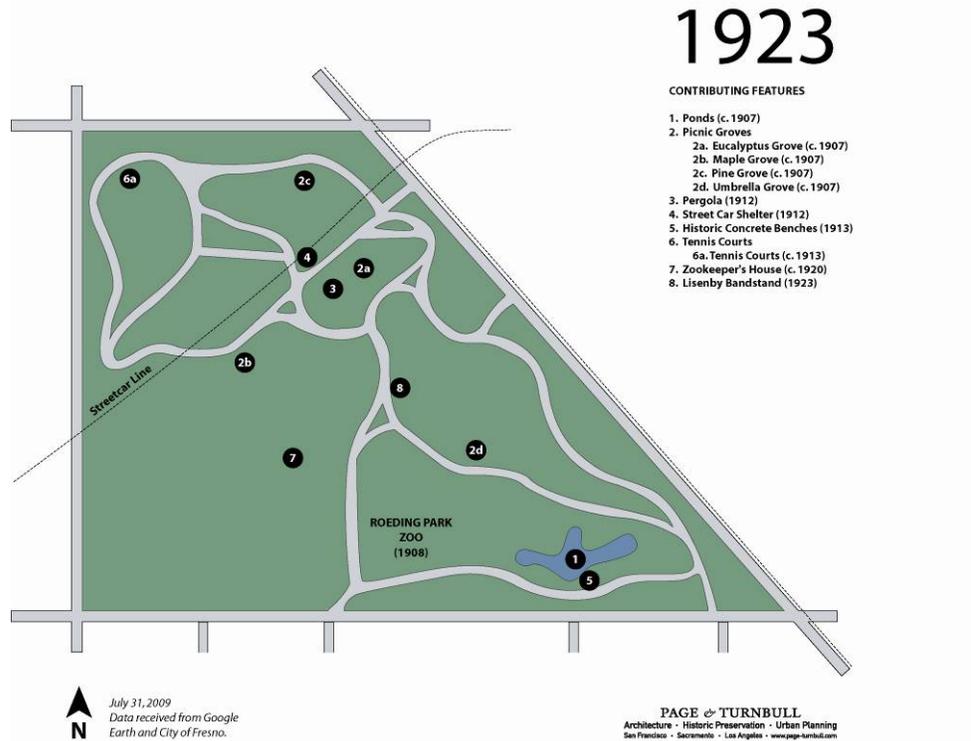


Figure 2: Roeding Park, 1923. (Page & Turnbull, drawn from historic aerial photographs and maps)



Figure 3: Roeding Park, 1937. (Page & Turnbull, drawn from historic aerial photographs and maps)

It appears that at least two additional ponds were constructed near the four original water features at an unknown date; these were later filled in with dirt and planted with trees (Figures 4-5).



Figure 4: Filled-in pond in southeast corner of Roeding Park. (Page & Turnbull, 2009)



Figure 5: Filled-in pond in southeast corner of Roeding Park. (Page & Turnbull, 2009)

### Contribution to the Roeding Park Historic District

The ponds are contributing features of the District because they evoke the naturalistic character of the landscape design. Water features were commonly included to provide passive recreation in early twentieth century municipal parks. Therefore, the ponds are significant for their contribution to the design and development of the District as an example of this municipal park typology.

### Individual Evaluation

The ponds do not appear to be individually associated with historically significant events that would qualify these features for listing under Criterion A/1/1. They are one feature of a set of park features that, collectively, represent the evolution of early twentieth century municipal park design as a recreational and scenic escape from urban life. Individually, the ponds do not strongly represent this theme.

The ponds are not individually associated with the lives of any persons significant in our past such that would qualify them for listing under Criterion B/2/2.

The ponds do not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values such that would qualify them for listing under Criterion C/3/3. The *concept* of the ponds is important to the naturalistic design of the park, but the individual style and design of the ponds does not appear to qualify under this criterion.

Overall, the ponds do not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

The ponds today differ from their original circa 1907 design, as they were expanded in size, character, and number in the late 1930s and at least two of the depressions constructed for the ponds have been filled in with dirt. The ponds have remained in the same general southeast area of the park since their original construction and have maintained their character as an early twentieth century water feature designed for passive recreation use. Although the exact placement and configuration of the

ponds changed over time, these changes occurred during the District's period of significance. Therefore, despite alterations, the ponds retain sufficient historic integrity to represent their contribution to the District's overall landscape design. Although the *concept* of the pond feature supports the design intention and significance of the District, the previous alteration of the ponds weakens the integrity of the feature as an individual resource.

### Conclusion

Previous alterations have weakened the integrity of the ponds. Individually, the ponds lack sufficient historic significance and integrity to be eligible for listing in the National Register.

## 2. UMBRELLA GROVE

The Umbrella Grove was constructed circa 1907 and was an important gathering space in Roeding Park's early history. The grove was the site of church and club picnics, a playground (developed in the 1920s), and contained a fountain (Figure 6). The fountain was filled in at an unknown date and now serves as a tree planter (Figure 7).

The Umbrella Grove, like many of the groves in Roeding Park has been altered over time. Non-historic picnic benches, platforms and related structures were added in the late twentieth century and a number of original trees were replaced.



Figure 6: Fountain, Umbrella Grove in Roeding Park, 1932. (Fresno Historical Society)



Figure 7: Planter (former fountain) south of Umbrella Grove, Roeding Park. (Page & Turnbull, 2009)

### Contribution to the Roeding Park Historic District

The Umbrella Grove (as well as the Pine, Eucalyptus and Maple groves) is a contributing feature of the District because it evokes the arboretum-like character of the landscape design at Roeding Park. Groves of mature trees were designed to create an ideal picture of nature and became popular gathering places. The picnic groves in Roeding Park are significant because they reflect the original design concepts of early twentieth century municipal parks in California.

### Individual Evaluation

The original picnic groves (Umbrella, Pine, Eucalyptus, and Maple groves) do not appear to be individually associated with significant events that have made a contribution to the broad patterns of our history that would qualify these features for listing under Criterion A/1/1. They are one of many elements in a set of park features that represent the picturesque, arboretum-like quality of early twentieth century recreational park design. Individually, the picnic groves do not strongly represent this theme.

The picnic groves are not individually associated with the lives of any persons significant in our past such that would qualify them for listing under Criterion B/2/2.

The design of the picnic groves alone does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values such that would qualify them for listing under Criterion C/3/3. The picnic groves today differ from their original circa 1907 design, as trees were replaced, and benches, lighting, concrete platforms, barbeques, water fountains and other non-historic features were added. The *concept* of the picnic groves as gathering spaces is important to the naturalistic design of the park, but the individual style and design of the Umbrella Grove does not appear to qualify under this criterion.

Overall, the Umbrella Grove does not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

The Umbrella Grove has remained in the same location within the park since its construction circa 1907, and continues to function as a picnic grove in the southeast quadrant of the park. The layout and number of features within the Umbrella Grove evolved during the period of significance, but the the early twentieth century grove continued to be used for picnicking and gathering. The Umbrella Grove was significantly altered during the District's period of significance; the fountain was filled and a large tree planted in its stead. However, the grove retains sufficient integrity to remain a contributing historic resource in the District because its design reflects the overall landscape design of the park. The alteration of the Umbrella Grove weakens the integrity of the feature as an individual resource, though; the changes to the resource compromised the integrity of the design, materials, workmanship and association of the grove, making the feature ineligible as an individual resource.

### Conclusion

Previous alterations have weakened the integrity of the Umbrella Grove. Individually, the grove lacks sufficient historic significance and integrity to be eligible for listing in the National Register.

## 3. PALM POINT GROVE

The Palm Point Grove was constructed circa 1946 and, coupled with the nearby palms planted along Golden State Boulevard at the southeast corner of the park, marks a dramatic visual feature of Roeding Park (see Figure 8). The Palm Point Grove, like many of the other groves in Roeding Park was altered over time. Changes included the removal and replacement of trees and addition of a circa 1960 picnic structure, barbecues, water fountains and other non-historic features. The Palm Point Picnic Shelter (1960) is considered a non-contributing feature of the District.



Figure 8: Aerial image of Roeding Park, 1967. Palm Point located inside circle. (Fresno Historical Society)



Figure 9: Palm Point Picnic Shelter, constructed circa 1960.  
Non-Contributing feature of the proposed Roeding Park Historic District. (Page & Turnbull, 2009)

### Contribution to the Roeding Park Historic District

The Palm Point, Cedar and Redwood Groves were constructed late in the period of significance but are considered contributing features within the District because they reflect the tradition to establish picnic groves in the park. The picnic groves demonstrate the significance of the District as an early twentieth century municipal park in California.

### Individual Evaluation

The mid-century picnic groves (Palm Point, Cedar and Redwood groves) do not appear to be individually associated with significant historic events that would qualify these features for listing under Criterion A/1/1. These picnic groves are one of many elements in a set of park features that represent the evolution of early twentieth century recreational park design, but do not strongly represent this theme.

The picnic groves are not individually associated with the lives of any persons significant in our past such that would qualify them for listing under Criterion B/2/2.

The design of the picnic groves alone does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values such that would qualify them for listing under Criterion C/3/3. The picnic groves today differ from their mid-century design, as trees were replaced, and picnic shelters and other non-historic features were added. The *concept* of the picnic groves as activity hubs is important to the evolution of the park's design, but the individual style and design of the Palm Point Grove does not appear to qualify under this criterion.

Overall, the Palm Point Grove does not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

The Palm Point Grove has remained in the same location within the park since its construction in circa 1946. The palm trees are the true centerpiece of the picnic grove, and enough original trees remain to evoke the character of the mature grove within the park. While the grove retains its historic landscape design, it experienced a significant change when the picnic shelter, water fountains, and barbeque pit were added circa 1960. Despite alterations after the close of the District's period of significance, the Palm Point Grove retains sufficient historic integrity to represent its contribution to the District's overall mid-century design. However, the addition of non-historic structures and objects to the Palm Point Grove weakens the integrity of the feature as an individual resource; changes to the individual character have compromised the grove's integrity of setting, design and association, making the feature ineligible as an individual resource.

### Conclusion

Previous alterations have weakened the integrity of the Palm Point Grove. Individually, the grove lacks sufficient historic significance and integrity to be eligible for listing in the National Register.

## 4. FRESNO CHAFFEE ZOO ADMINISTRATION OFFICE

Constructed in circa 1937 as the office of Roeding Park's first Superintendent, the Fresno Chaffee Zoo Administration Office was a small, rectangular shaped building constructed in a vernacular architectural style. An addition to the building was completed in 1973, which expanded the building's footprint to the north, creating an L-shaped floor plan. Changes were made to the building's east façade and entry at an unknown date and appear to pre-date the 1973 addition.



Figure 10: Rear additions to Zoo Administration Building. (Page & Turnbull, 2009)

### Contribution to the Roeding Park Historic District

The Zoo Administration Office is a contributing feature of the proposed Roeding Park Historic District because the building's architectural character, including its one-story wood frame construction, gable roof with exposed rafter tails, gabled entry porch, channel-drop wood siding, and

double-hung wood-sash windows, is representative of early twentieth-century park architectural design. Architecture in parks was discouraged because buildings were seen as intrusions into the scenic landscapes, so a specific, rustic style of park architecture developed in response to this philosophy. The Zoo Administration Office therefore contributes to the District because it is an example of a support building that reflects the above-described aesthetic that developed in early twentieth century municipal parks in California.

### Individual Evaluation

The Zoo Administration Office—originally the office of Roeding Park’s first superintendent—does not appear to be individually associated with significant historic events that would qualify these features for listing under Criterion A/1/1. The building is one of many elements in a set of park features that represent the evolution of early twentieth century recreational park design, but does not strongly represent this theme as individual resource.

The Zoo Administration Office is not individually associated with the lives of any persons significant in our past such that would qualify it for listing under Criterion B/2/2. While the Zoo Administration Office’s association with the first park manager is important within the context of the District, the park manager’s individual contributions to the history of Fresno and the development of early twentieth century municipal parks in California do not appear to be strong enough to qualify the Zoo Administration Office for listing under this Criterion.

The design of the Zoo Administration Office alone does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values such that would qualify it for listing under Criterion C/3/3. While the building embodies some concepts of early twentieth century park architectural design, it is vernacular in nature and not associated with any architectural style or designer, and thus does not appear to qualify as an individual resource under this criterion.

Overall, the Zoo Administration Office does not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

The Zoo Administration Office has remained in the same location within the park since its construction circa 1937. Two additions were made to the building that altered the original, simple rectangular plan. Despite these changes, which were made after the close of the District’s period of significance, the building has maintained its overall character as vernacular architectural feature in the southeast quadrant of the park, and is still able to convey its significance as a contributor to the District. However, the alterations have weakened the integrity of the building as an individual resource, diminishing its integrity of design, materials, and workmanship.

### Conclusion

Previous alterations have weakened the integrity of the Zoo Administration Office. Individually, the office lacks sufficient historic significance and integrity to be eligible for listing in the National Register.

## 5. GEORGE WASHINGTON MEMORIAL

The George Washington Memorial was established in Roeding Park in 1932 to mark the bicentennial celebration of George Washington’s birth. Over 300 trees were planted in February of that year by local school children to create the George Washington Memorial Grove. City Forester, Peter M.

Rasmussen planned the grove, which was formally dedicated on March 7, 1932. The bronze bust of George Washington was a gift from war veterans and other Fresnoans and placed at the east side of Lake Washington within the grove.

The appearance of the grove was altered in 1936, when Lake Washington was constructed by the Works Progress Administration (WPA) in this location. Many trees were removed. Little information exists about the exact changes that were made to the design of the memorial at that time.



Figure 11: George Washington Memorial bust, 2008. (Page & Turnbull)

### Contribution to the Roeding Park Historic District

The George Washington Memorial (1932) is a contributing feature of the proposed Roeding Park Historic District because it represents the commemorative period of Roeding Park. The City first began to focus on making the park a recreational destination for the middle class in the late 1920s and early 1930s, and introduced monuments and structures as attractions throughout the park. The George Washington Memorial therefore contributes to the significance of the District as an example of the park's development during this period.

### Individual Evaluation

*Note about evaluating monuments: According to National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, "Commemorative markers are designed or constructed after the occurrence of an important historic event or after the life of an important person. They are not directly associated with the person's productive life, but serve as evidence of a later generation's assessment of the past. Their significance comes from their value as cultural expressions at the date of their creation." Because a commemorative marker cannot qualify for association with the event or person it memorializes, it must be considered for its own design or its place in the community (i.e. the marker itself embodies the aesthetic values of the period of its creation, or is symbolic of the principles held by the generation that erected it).*

The George Washington Memorial was erected for the bicentennial of George Washington's birth, which was commemorated in cities and towns across the United States in 1932. However, the commemoration is not a historically significant contribution that warrants listing the memorial under

Criterion A/1/1. The memorial is one feature of a set of park features that collectively represents the early commemoration period of Roeding Park; individually it does not represent this theme.

A commemorative marker cannot qualify for association with the event or person it memorializes. The George Washington Memorial is therefore not individually associated with the lives of George Washington, or any persons significant in our past such that would qualify it for listing under Criterion B/2/2.

The design of the George Washington Memorial alone does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values such that would qualify it for listing under Criterion C/3/3. The memorial today consists of a bust and the remains of a planted tree grove. The memorial as it appears today represents the post-1936 changes that took place to the memorial after the insertion of Lake Washington and is not associated with any distinct style or designer.

Overall, the George Washington Memorial does not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

The George Washington Memorial has remained in the same general location in the park since it was erected in 1932 and retains integrity of location as associated with the overall historic district. The design and relationship of the memorial and tree grove changed with the completion of Lake Washington in 1936. Because these changes occurred during the District's period of significance, they do not detract from the memorial's relationship to the overall historic district, and the memorial still retains sufficient historic integrity to convey its significance as an early commemorative feature within the District. However, the 1936 alterations to the George Washington Memorial have weakened the integrity of the memorial as an individual resource; the memorial no longer represents its original design and therefore does not retain integrity as an individual resource.

### Conclusion

Individually, the George Washington Memorial lacks sufficient historic significance and integrity to be eligible for listing in the National Register. However, the memorial contributes to the overall significance and character of the District.

## 6. LAKE WASHINGTON

Lake Washington is a man-made lake, hand dug by workers from the WPA in 1936. It was not present at the original construction of Roeding Park, and is not considered one of the "ponds" (described previously). The lake was altered in 1954, when State Highway 99 was constructed along the west side of the lake, reducing the size of the lake and reconfiguring its western shoreline.



Lake Washington. (GoogleEarth, 2008).

### Contribution to the Roeding Park Historic District

Lake Washington is a contributing feature of the proposed Roeding Park Historic District because the lake evokes the character of the original landscape design at Roeding Park. The construction of a large water feature like Lake Washington continued the trend of picturesque designed landscapes that had characterized the park since its inception, and also represented the contributions of the Works Progress Administration (WPA). Although its shape was altered in 1954, Lake Washington is significant as a representation of the evolution of municipal park design and the efforts of the WPA during this period of the District's history.

### Individual Evaluation

Lake Washington is associated with significant events that have made a contribution to the broad patterns of our history, specifically the influence of the WPA in municipal parks in the United States in the 1930s. However, the construction and development of the lake is directly associated with its connection to Roeding Park and the lake does not appear to individually qualify for listing under Criterion A/1/1.

Lake Washington is not individually associated with the lives of any persons significant in our past such that would qualify them for listing under Criterion B/2/2.

Lake Washington does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values such that would qualify them for listing under Criterion C/3/3. The *concept* of Lake Washington as a water feature is important to the naturalistic design of the park, but the individual style and design of the lake does not appear to qualify under this criterion.

Overall, the lake does not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

Lake Washington has remained in the same general area of the park since its construction in 1936. Although the exact shape and size of the lake has changed dramatically from its original 1936 design, as it was reduced in size and altered in shape when Highway 99 was constructed in 1954, the lake continues to represent its character as an early twentieth century water feature. Despite the changes that occurred outside the District's period of significance, Lake Washington retains sufficient integrity of location, feeling, and association to convey its significance as a contributor to the District. However, the dramatic alterations to the lake's size and shape have weakened its integrity as an individual resource; the lake lacks sufficient integrity of design, setting, materials, and workmanship to qualify as an individual resource.

### Conclusion

Previous alterations have weakened the integrity of Lake Washington. Individually, the lake lacks sufficient historic significance and integrity to be eligible for listing in the National Register.

## 7. GEORGE C. ROEDING MEMORIAL

The George C. Roeding Memorial consists of a cast bust of Roeding with a fox (Figure 12). The bust was placed in the park in 1929 and was the first memorial to be located in the park, marking the beginning of the commemorative period in Roeding Park. The bust is currently located within a planting bed to the rear of the Zoo Administration Office. No information was found about the original location of the bust, and it is possible that the bust was moved here at a later date.

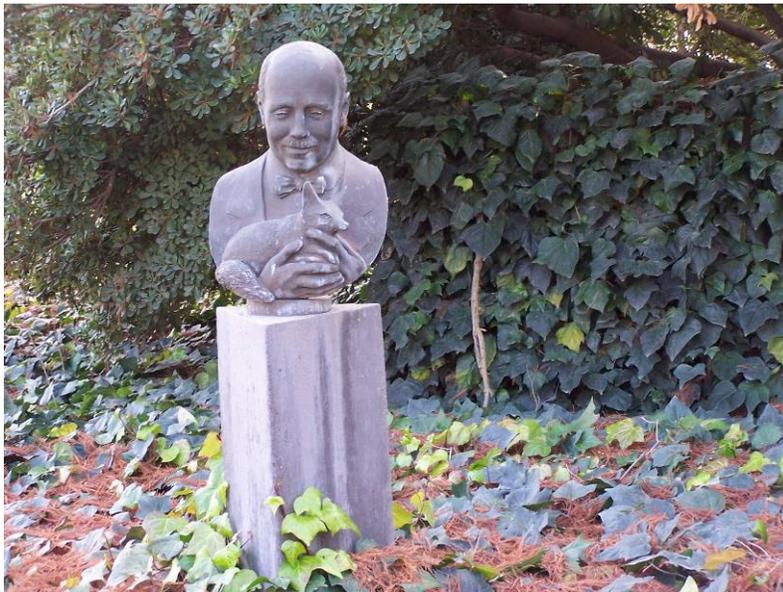


Figure 12: George C. Roeding bust, 2009. (City of Fresno)

A much grander monument was originally planned to commemorate Roeding's contributing to the park. The design was highlighted in the *Fresno Bee* on December 13, 1929 and described the following (Figure 13):

“The memory of George C. Roeding, for many years a citizen of Fresno, will be perpetuated through the erection of the memorial pictured here which has been approved by the public affairs committee of the Fresno County Chamber of Commerce. Plans for the erection of the memorial, involving the rearrangement of the main entrance to Roeding Park, will be turned over to a special committee which was announced today. Above is an elevation sketch showing the memorial in perspective with a large ornamental pool in the foreground proposed by Architect Charles Butner. The change in the entrance, showing its location with respect to the Belmont Avenue bore and the two driveways, is shown below. The upper sketch indicates night illumination of the entrance through floodlighting.”<sup>4</sup>

Many of the other memorials installed in the park around this time also involved the careful selection of a site and design of the overall landscape plan.

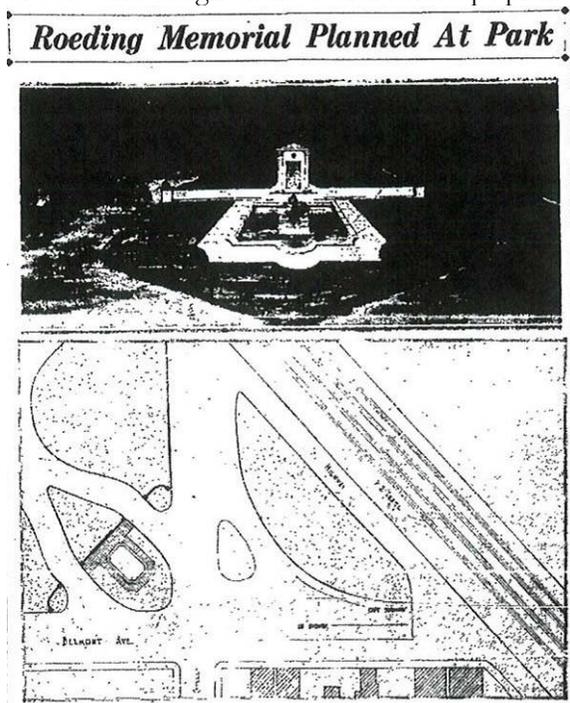


Figure 13: George C. Roeding Memorial design, not executed (*Fresno Bee*, December 13, 1929).

### Contribution to the Roeding Park Historic District

The George C. Roeding Memorial (1929) is a contributing object within the proposed Roeding Park Historic District because it represents the commemorative period of Roeding Park. As described in the *Fresno Bee* article, the memorial was carefully planned, although its original design was never realized. Like the George Washington Memorial, the George C. Roeding Memorial contributes to the significance of the District as an example of the park’s development during this period.

### Individual Evaluation

See note about evaluating monuments, page 19:

The George C. Roeding Memorial does not appear to be individually associated with significant events that have made a contribution to the broad patterns of our history such that would qualify these features for listing under Criterion A/1/1. The memorial is one feature of a set of park features

<sup>4</sup> “Roeding Memorial Planned at Park” *Fresno Bee* (December 13, 1929).

that collectively represents the early commemoration period of Roeding Park, but it does not individually represent this theme.

A commemorative marker cannot qualify for association with the event or person it memorializes. While the George C. Roeding Memorial commemorates the life of George C. Roeding and his contribution to Roeding Park, there is no direct association between the memorial and Roeding's productive life, and the memorial therefore does not individually qualify for listing under Criterion B/2/2. Roeding's productive life is instead better represented by the District as a whole.

The design of the George C. Roeding Memorial alone does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values such that would qualify it for listing under Criterion C/3/3. The memorial consists of a simple cast bust located in a planting bed near the Zoo Administration Office and does not represent any significant planning or design principles. The memorial is not associated with any distinct style or designer, and as the original memorial design was never realized, it does not possess high artistic values under this criterion.

Overall, the George C. Roeding Memorial does not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

Little is known about what changes may have occurred to the George C. Roeding Memorial since its installation in 1929. The memorial appears to represent its original form, although the exact location of the bust is not confirmed and it may have been moved to its current location. Many of the other memorials installed in the park around this time involved the careful selection of a site and design of the overall landscape plan, as was described for this memorial in the *Fresno Bee* article outlined above. Although the original design was never realized and the current location of the George C. Roeding Memorial is unlikely its original location, the memorial retains sufficient historic integrity to convey its significance as the earliest extant commemorative feature within the District. Evidence regarding the individual integrity of the George C. Roeding Memorial is inconclusive, but if it was discovered that the memorial had in fact been moved, its location, design, setting, feeling and association as an individual resources would be compromised.

### Conclusion

Individually, the George C. Roeding Memorial lacks sufficient historic significance and integrity to be eligible for listing in the National Register. However, the memorial contributes to the overall significance and character of the District.

## 8. FREDERICK AND MARIANNE ROEDING MONUMENT

The Frederick and Marianne Roeding Monument was installed in Roeding Park in 1939 and originally consisted of a large, triangular-shaped granite boulder with a bronze plaque. The monument was donated by the Roeding's sons, Frederick and Henry, to commemorate the 35th anniversary of the gift of Roeding Park to the City of Fresno by their parents, Frederick and Marianne Roeding.



Figure 14: Frederick and Marianne Roeding Monument, 2008. (Page & Turnbull)

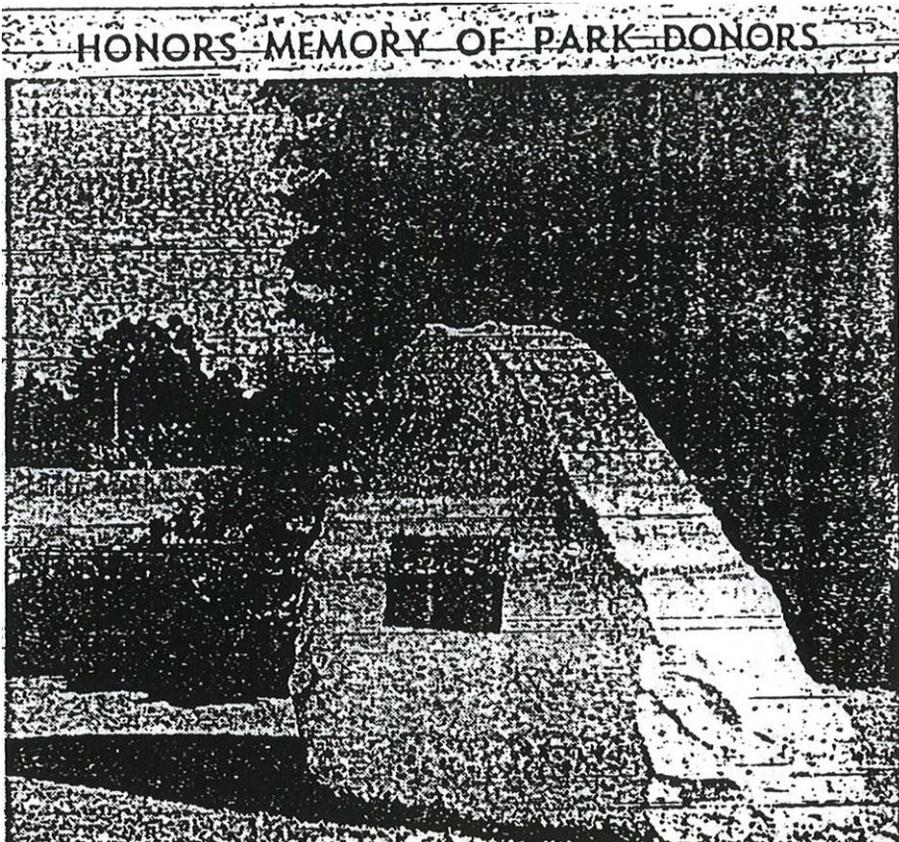


Figure 15: Frederick and Marianne Roeding Monument, 1939. (Fresno Bee).

### Contribution to the Roeding Park Historic District

The Frederick and Marianne Roeding Monument (1939) is a contributing feature of the proposed Roeding Park Historic District because it represents the commemorative period of Roeding Park. The City first began to focus on making the park a recreational destination for the middle class in the late 1920s and early 1930s, and introduced monuments and structures as attractions throughout the park. The Frederick and Marianne Roeding Monument therefore contributes to the significance of the District as an example of the park's development during this period.

### Individual Evaluation

*See note about evaluating monuments, page 19:*

The Frederick and Marianne Roeding Monument does not appear to be individually associated with significant events that have made a contribution to the broad patterns of our history such that would qualify these features for listing under Criterion A/1/1. The monument is one of many elements in a set of park features that collectively represents the early commemoration period of Roeding Park, but it does not individually represent this theme.

A commemorative marker cannot qualify for association with the event or person it memorializes. The Frederick and Marianne Roeding Monument commemorates the lives of Frederick and Marianne Roeding George C. Roeding and their contribution to Roeding Park, there is no direct association between the monument and the Roedings' productive life and the monument therefore does not individually qualify for listing under Criterion B/2/2. The Roedings' productive life is better represented by the District as a whole.

The design of the Frederick and Marianne Roeding Monument alone does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values such that would qualify it for listing under Criterion C/3/3. The monument consists of a large boulder and does not represent any significant planning or design principles. The monument is not associated with any distinct style or designer, and it does not possess high artistic values under this criterion.

Overall, the Frederick and Marianne Roeding Monument does not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

Little is known about what changes may have occurred to the Frederick and Marianne Roeding Monument since its installation in 1939. When comparing the newspaper image from 1939 and the appearance of the monument today, it is clear that the original boulder was either replaced, dramatically altered, or never fully realized. The exact location of the monument is not confirmed and it may have been moved to its current location. Although the Frederick and Marianne Roeding Monument may have been altered and/or moved from its original location, the memorial retains sufficient historic integrity to convey its significance as the earliest extant commemorative feature within the District. Evidence regarding the individual integrity of the Frederick and Marianne Roeding Monument is inconclusive, but if it was discovered that the monument had in fact been moved and/or altered, its location, design, setting, feeling and association as an individual resource would be compromised.

### Conclusion

Individually, the Frederick and Marianne Roeding Monument lacks sufficient historic significance and integrity to be eligible for listing in the National Register. However, the monument contributes to the overall significance and character of the District.

## 9. CONCRETE BENCHES

The concrete benches in Roeding Park appear to date to circa 1907, as the benches are evident in historic images from this period. The benches appear to be the earliest furnishings in the park and a few examples remain, randomly located near the ponds and the park boundary (Figures 16 and 17).



Figure 16: Early view of Roeding Park ponds with concrete bench, circa 1910 (Fresno Historical Society).



Figure 17: Concrete bench in Roeding Park, unknown location, circa 1960. (Pete Rocco, clippings binder)

### Contribution to the Roeding Park Historic District

The concrete benches are contributing features of the proposed Roeding Park Historic District because they represent the early design of the Park. Site furnishings were commonly included in the design of early twentieth century municipal parks to facilitate public enjoyment of the picturesque

landscape through passive activities like sitting, picnicking, and relaxing. Therefore, the benches are significant for their contribution to the design and development of the District as an example of this municipal park typology.

### Individual Evaluation

The concrete benches do not appear to be individually associated with significant historic events that would qualify these features for listing under Criterion A/1/1. The concrete benches are one of many elements in a set of park features that represent the evolution of early twentieth century recreational park design. The benches are one of a set of park features that collectively represents the twentieth century municipal park design, but do not individually represent this theme.

The concrete benches are not individually associated with the lives of any persons significant in our past such that would qualify them for listing under Criterion B/2/2.

The concrete benches do not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values such that would qualify them for listing under Criterion C/3/3. The *concept* of the benches as features which support passive park features is important to the naturalistic design of the park, but their simple concrete form and random location throughout the park indicate that the benches do not appear to qualify as individual resources under this criterion.

Overall, the concrete benches do not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

The concrete benches today appear to represent their original circa 1907 design, however, only a few examples remain of what was once a common feature throughout the park. The exact placement and number of the concrete benches has likely changed over time, and many historic benches have been replaced with examples from various time periods. This has resulted in a fragmented collection of benches in the park which do not represent any deliberate design or aesthetic. Despite relocation and removal of some concrete benches from 1907, the remaining benches retain sufficient historic integrity to represent their contribution to the District's overall landscape design and setting. While the *concept* of the benches as an early example of park furnishings supports the design intention and significance of the District, the alteration of the benches weakens the integrity of the feature as an individual resource.

### Conclusion

Previous alterations to the collection of 1907 benches within Roeding Park have weakened the integrity of the feature. Individually, the benches lack sufficient historic significance and integrity to be eligible for listing in the National Register.

## 10. CIRCULATION PATTERNS

The circulation patterns in Roeding Park, including roads and pedestrian walkways, were installed during the period of significance from 1903 to 1953. These features are characterized by a curvilinear appearance meant to create a meandering experience within the park's designed landscape (Figure 18). Several changes occurred to the circulation patterns during and after the period of significance, but overall the character of the early park circulation patterns has been retained.



Figure 18: View of road in Roeding Park, 1940s. (Fresno Historical Society)

### Contribution to the Roeding Park Historic District

The circulation patterns are contributing features of the proposed Roeding Park Historic District because they represent the early design of the Park and its evolution through the period of significance. The curvilinear circulation patterns were meant to create a meandering experience within the park's designed landscape, and are an essential part of the park's arboretum feeling. Although they have been incrementally changed, the circulation patterns in Roeding Park remain significant because they reflect the original design concepts of early twentieth century municipal parks in California.

### Individual Evaluation

The circulation patterns do not appear to be individually associated with significant events that have made a contribution to the broad patterns of our history such that would qualify these features for listing under Criterion A/1/1. The circulation patterns are one of many designed landscape elements in a set of park features that collectively represent the evolution of early twentieth century recreational park design, but individually, do not reflect this theme.

The circulation patterns are not individually associated with the lives of any persons significant in our past such that would qualify them for listing under Criterion B/2/2.

Although the circulation patterns at Roeding Park reflect the distinctive characteristics and design concepts of early twentieth century municipal parks, circulation is just one element of the original designed landscape and is inextricably linked to the overall park design. The circulation patterns at Roeding Park do not appear to individually represent this theme such that would qualify them for listing under Criterion C/3/3.

Overall, the circulation patterns do not appear to be individually eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or Fresno Local Register of Historic Resources due to lack of individual distinction and significance.

### Integrity

Today, the circulation patterns at Roeding Park represent the overall park layout from the period of significance. Although the exact configuration of the circulation patterns and surfacing and curbing materials have changed over time, these changes occurred during the period of significance and the features have largely maintained their character as early twentieth century designed landscape features of Roeding Park. Major alterations to the circulation patterns which are not in keeping with the meandering character of the original design include the dramatically altered pathways in the center of the park (in proximity of the zoo) and the additional paths added to the northern portion of the park over time. Despite these alterations, many of which occurred during the District's period of significance, the overall character of the historic circulation patterns remains, and the circulation patterns therefore retain sufficient historic integrity to contribute to the District. However, the alteration of the circulation patterns weakens the integrity of this feature as an individual resource; the circulation patterns lack sufficient integrity of the design, materials, and workmanship to qualify for listing as an individual resource.

### Conclusion

The circulation patterns lack individual significance and integrity, but they contribute to the overall significance and character of the District.

### CONTRIBUTING FEATURES MATRIX

The following table summarizes the status of the features within the proposed Roeding Park Historic District, and summarizes the effects of the proposed project on each feature.

**Roeding Park Historic District  
Contributing Features Matrix**

Feature	Area	Year Built	Individually Eligible?	Contributing (pre-Project)?	Project Action	Contributing (post-Project)?
Pond A*	Park	ca. 1907	N	Y	Demolition	N
Pond B*	Park	ca. 1907	N	Y	Demolition	N
Pond C*	Park	ca. 1907	N	Y	Demolition	N
Pond D*	Park	ca. 1907	N	Y	Demolition	N
Eucalyptus Grove	Park	ca. 1907	--	Y	No Change	Y
Maple Grove	Park	ca. 1907	--	Y	No Change	Y
Pine Grove	Park	ca. 1907	--	Y	No Change	Y
Umbrella Grove	Park	ca. 1907	N	Y	Demolition	N
Pergola	Park	1912	--	Y	Rehabilitation	Y
Street Car Shelter	Park	1912	--	Y	No Change	Y
Historic Concrete Benches*	Park	1913	N	Y	Relocation	Y
Tennis Courts*	Park	ca. 1913, ca. 1935	--	Y	No Change	Y
Zookeeper's House	Zoo	ca. 1920	--	Y	No Change	Y
Lisenby Bandstand	Zoo	1923	--	Y	Rehabilitation	Y
George C. Roeding Monument	Park	1929	N	Y	Relocation	Y
George Washington Memorial	Park	1932	N	Y	Relocation	Y
Fresno Chaffee Zoo Administration Office	Park	ca. 1937	N	Y	Relocation	Y
Lake Washington	Park	1936	N	Y	Alteration	Y
Frederick and Marianne Roeding Monument	Park	1939	N	Y	Relocation	Y
Palm Point Grove	Park	ca. 1946	N	Y	Demolition	N
Cedar Grove	Park	ca. 1948	--	Y	No Change	Y
Redwood Grove	Park	ca. 1950	--	Y	No Change	Y
Japanese-American World War II Memorial	Park	1950	--	Y	No Change	Y
Folk Dance Platform #1*	Park	1950	--	Y	No Change	Y
Folk Dance Platform #2*	Park	1950	--	Y	No Change	Y
Circulation Patterns**	Park	Various	N	Y	Alteration	Y
City Maintenance Yard**	Maintenance	Unknown	N	N	Demolition	N
Lion House	Zoo	1936	N	N	Alteration	N
Elephant House	Zoo	1949	N	N	Demolition	N
Seal Pool	Zoo	1952	N	N	Demolition	N
Monkey Island	Zoo	1953	N	N	Demolition	N
Giraffe Barn	Zoo	1954	N	N	Demolition	N
Amphitheater	Zoo	1954	N	N	Alteration	N
Bear Grottoes	Zoo	1955	N	N	Demolition	N
Rotary Playland	Playland	1955	N	N	Alteration	N
Locomotive**	Park	1956	N	N	No Change	N
Palm Point Picnic Shelter	Park	ca. 1960	N	N	Alteration	N
Pine Grove Picnic Shelter	Park	ca. 1960	N	N	No Change	N

**Roeding Park Historic District  
Contributing Features Matrix**

Feature	Area	Year Built	Individually Eligible?	Contributing (pre-Project)?	Project Action	Contributing (post-Project)?
Walk-Through Aviary	Zoo	1960	N	N	Demolition	N
Ape Grottoes	Zoo	1961	N	N	Demolition	N
Horseshoe Arena	Park	Before 1961	N	N	No Change	N
Pump Houses #1*	Park	1961	N	N	No Change	N
Pump House #2*	Park	1961	N	N	No Change	N
Storyland	Storyland	1962	N	N	Alteration	N
Hippo Exhibit	Zoo	1963	N	N	Demolition	N
Rhino Exhibit	Zoo	1963	N	N	Alteration	N
Fennec Fox Cage	Zoo	1964	N	N	No Change	N
Tennis Courts*	Park	ca. 1980	N	N	No Change	N

\* Note: Groups of similar features were compiled on single DPR 523A forms.

\*\* Note: DPR 523A forms were not completed for these features.

Landscape characteristics that are considered contributing features of the proposed Roeding Park Historic District include the overall spatial organization/site plan of the park, historic roads and paths, and lawns. Although these resources cannot be counted in the same manner as the features in this table, it is these landscape characteristics that best convey the District's significance as an example of an early twentieth century municipal park. These landscape characteristics would generally be retained by the proposed project.

<b>Proposed Historic District Summary</b>	
Individually Eligible:	0
Contributors, pre-project:	23
Non-contributors, pre-project:	22
Contributors, post-project:	20
Non-contributors, post-project:	25



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**Attachment C:  
Correspondence from Janet Gracyk**



**From:** Janet Gracyk [mailto:gracyk707@gmail.com]  
**Sent:** Tuesday, December 07, 2010 11:10 AM  
**To:** Kevin Fabino  
**Subject:** Roeding Park

Dear Kevin,

Thank you for your contact regarding the potential for the HALSncc group to engage in further conversation on the Roeding Park proposal. On behalf of the group I am respectfully declining your invitation. At this time our organization is not structured to supply a representative who can represent the views of the organization during an interactive discussion; we arrive at our decisions and recommendations by consensus. Our previous letter represents a consensus of the group's views.

I have every expectation that with continued involvement from the National Trust, the California Preservation Foundation, and local organizations that the view of preservationists will be expressed fully.

Thank you again for your outreach, and I wish you all the best as you proceed.

Regards,

*Janet Gracyk*

**Chairperson, HALSncc**  
**Terra Cognita Design and Consulting, LA 5491**  
**145 Keller Street**  
**Petaluma, CA 94952**  
**Cell 707-695-9360**

