

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^{inc} (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 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.

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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.

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.

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.

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.

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.

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.

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 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 demolition¹. 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.

¹ 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/

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.

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.

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 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.

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.

In Mitigation 2, 4th 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.

Impact 3, 2nd 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.

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.

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.

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.

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.

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.

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?

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

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.

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.

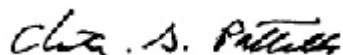
The plan to fence Storyland and Playland together as one large fenced (and pay to enter) area would mean that the public would no longer have continuous free access to Lake Washington. This was not addressed in the Historical Resources Assessment and represents another significant omission.

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%.

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.

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^{inc}