



November 24, 2010

Submitted Electronically

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 DRAFT ENVIRONMENTAL IMPACT REPORT
(SCH NO.: 2008031002)**

Dear Mr. Fabino,

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.

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

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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.

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.

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.

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.

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

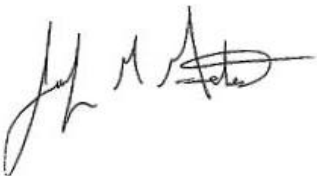
There are only two alternatives, in addition to the standard "No Project" Alternative analyzed for this project. The Limited Expansion Alternative as described and depicted in Figure 24-2, would retain more or the contributing elements than the Proposed Project, however it does not state what historic 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.

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.

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?

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
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