

1615 Broadway – Suite 705
Oakland, California 94612
Telephone: (415) 763-0972

*A Statewide Non-Profit Organization
Promoting Historic Preservation*

February 25, 1991

Roy Anderson, Planning Director
Department of Community Development
City of Santa Rosa
P.O. Box 1678
Santa Rosa, CA 95402

Dear Roy,

I visited Santa Rosa several weeks ago to look at and think about John Medica's Garden. Preserving that site for future enjoyment would be a terrific accomplishment because it stands in the way of development and, at present, has no defenders.

The development plan that has been proposed has some major inadequacies and the resultant project (1) offers no guarantees that the resource will be protected even in the immediate future, (2) would have serious adverse impacts on the resource which, (3) cannot be adequately "mitigated" as the proposal now stands. I think the developer is trying to make this work but, in my opinion, is asking too much of the site. I would suggest you start over and design the site protection first and then determine the number of parcels and units after the task of resource protection is satisfied.

I argued -- and will continue to do so no matter who comes in as an expert -- that the house and out buildings are part of the Medica resource. Thus, the road through the middle of the parcel -- requiring demolition of the buildings and the moving of architectural pieces of the garden -- clearly constitutes a significant adverse impact; further, demolition is not adequately mitigated by photography, particularly when alternatives may exist.

The fundamental failure of this proposal is that resource protection has been tacked on to a project after the fact and CEQA is then called in, not to adequately assess impacts and alternatives, but to accept a given -- this proposal and no other -- and to limit the damage to be done. From a CEQA standpoint, the approach is backwards.

From a planning and resource protection standpoint, maybe you should only permit four parcels in the subdivision or consider clustered housing. By designing the development the way it was designed, and then satisfying all of the standard requirements of the Public Works Department, you are left with a proposal which consumes the center of the site with the service road. This is not a "standard" piece of property and should not be subjected to standards which unnecessarily destroy the charm and character of the site.

Is that road really necessary when the site is already served by one road and is bounded by two other streets?

An EIR might educate the broader community as well as the decision-makers about the importance of the site and an EIR should investigate reasonable alternatives, including a not-for-profit development which might prove to be a far better solution. The City is not required to justify the first proposal that appears, you are not required to maximize profits of an individual who has an option on the property, you are not required to maximize profits of the heirs, you are not even required to preserve the historic resource. But, because of the California Environmental Quality Act, you are required to seriously consider impacts and investigate alternatives to this project.

I realize my comments may complicate matters but I do think the resource requires the City to do more thinking about the current proposal. And an EIR should be the tool you use to do so.

Sincerely,

A handwritten signature in black ink that reads "John F. Merritt". The signature is written in a cursive style with a horizontal line extending from the end of the name.

John F. Merritt, Director

cc: Glenn Burch, Seymour Rosen, Susan Brandt-Hawley