

Comments on B Street Visioning Process DEIR October 13, 2006

(Note: numbers refer to Impact numbers as given in Table 2-1, Summary of Impacts and Mitigations.)

General

1. The document titled: "Implementation Summary Report" circulated with the DEIR and presented at public hearings should have been incorporated into the EIR at least as an appendix: it contains the proposed changes to the General Plan, CASP and Conservation District Design Guidelines, and appears to have been the basis for the EIR Project Alternative, on which the impacts assessment is based, including specific illustrations and graphics changes to the Design Guidelines showing the expected outcome of implementation of the project policy changes. Since the "Project" *is* the proposed changes to the General Plan, CASP, Design Guidelines and other policy documents, understanding both the project itself and the expected impacts (a sort of ghost "development project") requires knowledge of the changes and amendments to the major planning documents involved.

2. The fact that the DEIR finds significant unavoidable impacts in parking, historic resources (multiple impacts), land use, aesthetics (visual, trees, quality), and noise indicates the magnitude of the change in policy proposed. The project contradicts the numerous statements in the city's current planning documents and ordinances (see DEIR pgs. 4.3-6 to 9 for quotes) establishing goals and policies of preservation, adaptive reuse & conservation of historic resources and the distinguishing characteristics of the traditional neighborhoods and original downtown. It fragments the University-Rice neighborhood and guarantees demolition or removal of a significant portion of the neighborhood's contributing historic resources and serious impairment of its other distinguishing characteristics.

The project proposed policy changes the main "conservation" document, *Davis Downtown and Traditional Residential Neighborhood Guidelines* from a "conservation" policy document, into an internally inconsistent hybrid, with new guidelines that, far from promoting preservation or even adaptive re-use, or "respecting the character" of the existing neighborhood, virtually mandate demolition of historic resources and promote development that in mass and height cannot possibly be considered to "respect" the existing neighborhood character.

The Design Guidelines were only recently developed with much public input and effort, and the covered traditional neighborhoods have come to rely on them to protect their neighborhoods from incompatible development, while allowing reasonable and desirable compatible infill and development. Under these Guidelines, considerable increase in density through genuine compatible infill has occurred in the Old North traditional neighborhood, for example, without impairing its character. The new development allowed by the project changes is neither infill nor reuse of resources in any sense. The graphics/illustrations of the altered guidelines, unable to draw on examples from Davis

itself, are of row houses and multistory developments of different periods and styles from other areas; any “reflection” of the current neighborhood is unrecognizable.

Such a hybrid, inconsistent document produced by the project amendments is not good practice. It also leads to concerns in the other neighborhoods covered by the Guidelines that their area of the Conservation District is next in line for modification away from the existing guidelines that do promote conservation, adaptive re-use and compatible infill to a inconsistent hybrid document that allows and even promotes the contrary, including demolition.

The new so-called “special character area” created by the revisions would be essentially a “donut hole” in the Conservation District with no conservation characteristics whatever. While described as a “transition,” it is difficult to see the predicted development – much of it taller than most of the present commercial area – as transitional from the adjacent one or two story commercial area and Central Park to the east, and the predominately one story remaining traditional residential area to the west. Rather the new development suggests a three or more story virtual wall between these two areas.

3. The EIR adjudges the removal of single contributing historic structures (not eligible for local listing except as a component of a Historic District) to be less than significant and requiring no mitigation; only cumulatively at some point will removal of the group become significant. Because the project area is in multiple separate ownerships, hence will be developed piecemeal, it will not only likely foster an uncoordinated disparate design aesthetic, it will also trigger a race among owners for individual demolition of the contributing structures, so as to get demolition approval before the individual property demolitions reach the tipping-point of cumulative significance. This will discourage any one owner of the group from the kind of compatible infill and reuse advocated by all the city’s planning policy documents heretofore. Essentially, what the changes will promote is “teardown”, the regrettable current trend so far avoided by Davis since the 1960s-70s.

4. Considering the multiple unavoidable significant project impacts, and the striking revision of so many policy documents, the DEIR fails to describe either the compelling reasons for the choice of the location of the project, or the overriding offsetting benefits that would have to result to justify such a project.

5. The DEIR fails to consider alternate location(s) for this project, such as vacant lots and ugly, poorly designed low density 60s-70s development in the downtown commercial area.

IS-1 & 2 - Cultural Resources

1. The project area was originally developed as farms and subsequently occupied by residences before the city of Davis had water or sewage systems. It is quite likely therefore that subsurface excavations will encounter previously undiscovered or mapped urban archeological or historic remains other than Native American, e.g. privy sites (historically used to dispose of many small objects such as medicine bottles, broken tools,

etc.), abandoned cellars, wells, and the like providing historical urban development information and artifacts.

2. Central Park is a major Davis cultural resource, already historically “framed” by predominately single story residential face blocks, the Community Church landmark, and for over 50 years, the 5th and B apartment complex, the earliest example of “garden apartments” in Davis. The virtually intact (“high degree of integrity”) 300 block of B Street facing the park across typical front lawns and parkway strip with street trees, is a “signature” or iconic Davis residential block associated with the park, forming part of the Park’s classic small town setting. Together the Park and adjacent historic residential face blocks have characterized and distinguished Davis along the “gateway” B Street (historically the main highway route) of the city.

Central Park in recent years has been experiencing increased “coverage” with both buildings and paving, coupled with high usage that is taking a toll on the lawn and other remaining green areas in particular, through ad hoc “pedestrian & bike paths”.

The potential impacts on Central Park of the radical change in setting and aesthetics, particularly on the west side, increased vehicular traffic, parking, and air pollution, noise, and usage due to increased proximate population should have been analyzed.

(It is also difficult to imagine how being “framed” by a parking structure to the north would benefit the existing aesthetic or setting of this major cultural resource. 4.2-5, #4)

3. Billed as promoting an “urban village” in the project area, the DEIR fails to recognize that the targeted neighborhood is already a diverse, mixed use neighborhood: an urban village.

Circulation and Parking

4.2-1, 4.2-6 The traffic analysis is concentrated on the streets and intersections adjacent to the project in a virtually myopic manner. The adjacent traditional neighborhood to the north, Old North Davis, is already suffering problems with the 5th Street corridor for all forms of travel, both along the street and at cross streets. Congestion on B Street already results in diversion of auto traffic to adjacent streets with hazardous unmarked intersections, particularly E Street, which is used as an alternate peak time entrance, exit and route through downtown, and D Street, which is used as an alternate route to the northern part of town cutting through the Old North neighborhood. The additional traffic may well trigger need for signals at these streets crossing 5th, particularly for bike and pedestrian safety, as well calming measures on D and E north of 5th.

The Old North Neighborhood Association has been seeking a solution for these problems for over two years. The impacts on Old North and the other adjacent neighborhoods and side streets should have been analyzed with the models used to study the traffic calming, bike and pedestrian safety proposals for 5th Street between L and A Street.

Any increase in traffic in the project area and adjacent neighborhoods, particularly along B Street, which must be crossed by University-Rice residents for bike and pedestrian access to downtown, or 5th Street, crossed by Old North for downtown access, will simply increase the existing challenges and dangers for bikes and pedestrians, especially children.

4.2-2, 4.2-4 Alleys and services in project area:

The project essentially proposes to turn the alleys into narrow full service 2-way streets, used by bicycles, pedestrians and autos, with access to all proposed new construction parking facilities off the alleys. The proposed 2 and 3 story residential development on the east side of the alleys would for practical purposes have their front doors on the alley with a narrow setback.

The alleys were built as service and utility corridors with low levels of traffic consisting of occasional access to garages or parking areas for the adjacent residences. The project will particularly impact the remaining residences of the traditional neighborhood, placing a street in back of them where previously they had relative privacy and shelter from street noise and the view of their neighbors. Most existing rear yard fences and gates directly abut the alley, where they will be increasingly subject to damage from autos. Visitors approaching or leaving the new alley residential development will do so along the alley-street, producing increased noise at all hours of the day. Multi-story development on the east side of the alleys will overlook the west side neighbors' remaining private spaces.

Widening and paving the alleys, along with the increased traffic will make maintenance of what trees may remain along the alleys difficult.

No consideration has been given to the practicalities of delivering mail, locating a residence front door (a difficulty common in the traditional neighborhoods already where numerous second units and in-law cottages essentially use the alleys as their principal "street" access, and which is a consideration in an emergency as well); or collecting garbage and yard waste, currently a considerable challenge in the Core Area neighborhoods, where two large containers per household already compete with yard waste piles and parking for curb space, pose an aesthetic problem with container storage, and contribute to air and water pollution when the around the clock parking prevents proper street cleaning or yard waste pickup.

4.2-3 Impacts of the project on the Davis service area of the Yolo Bus Davis-Sacramento 43 and 44 Express routes was not even considered; only the "Reverse" routes (inbound from Sacramento in the morning) routes were even mentioned, along with the Uni-Trans routes immediately adjacent to the project area.

Both the 43 and 44 Yolo bus express routes, as well as the regular 42 route, travel along and have stops directly adjacent to or within one or two blocks of the project area, currently providing highly convenient transit for residents of the adjacent neighborhoods who work in Sacramento. The proposed development will certainly be attractive to Sacramento commuters.

In over 30 years of commuting to work using these two express routes from the Old North neighborhood, watching the development of the new residential areas served by these routes in East and South Davis, I have observed the consequences of even a small increase, such as half a dozen, regular riders, especially those boarding early in the route, as would be the case with project area commuters. These express routes tend to run “full” at all times with “regular” riders. When new regulars are added, the regular riders toward the end of the route end up standing, which is extremely unpleasant (to both the standees and the sitting passengers they are looming over) if not dangerous, especially on the freeway, as anyone who has done it can attest. After a few days of standing, the standees tend to do one of two things, both adverse impacts: they either drive and park to an earlier stop so as to get a seat (so other have to stand), or they give up on bus transit and go back to commuting by car. The result in this case would be either more parking impact in the project and adjacent areas, or more auto traffic from the areas toward the end of the routes.

- 4.2-5 Parking demand: The proposed mitigations are theoretical projects largely dependant on other agencies (University, School District) over which the City has no control, are untried and possibly unsuited to the expected population (car-share program), or unrealistic as mitigation: (speculative parking structures blocks from the project; in-lieu fees).

With the exception of in-lieu fees, none of the proposed mitigations could conceivably be implemented in time to actually mitigate the anticipated impacts.

In-lieu fees: as has been abundantly pointed out, in-lieu fees are not a realistic mitigation. They take not one car off the street in a reasonable period of time. They simply cause the parking problems to move elsewhere. The University-Rice neighborhood residents already have problems with parking on the alleys as well as the streets.

Due to parking restrictions in most of the rest of the “core area” and neighborhoods adjacent to the University, currently the Old North neighborhood is the “overflow” parking area for downtown employees and business people, university employees and especially students, visitors, park-and-ride (bus) and park-and-bike users, etc. Students particularly, who maintain cars for weekend trips or part time work, tend to “store” autos for days at a time on the neighborhood streets during the week.

Old North has recently implemented an innovative parking district – still in the test/evaluation stage – that attempts to accommodate these “overflow” users by sharing the available space, allotting one restricted space per residence, while allowing residents, particularly stay at home parents, seniors, in home care workers, and part or full time home workers to find a parking space near or in front of their home during the day when they return from shopping and other errands. Increased overflow generated by the proposed development will exacerbate these problems already experienced in the adjacent neighborhoods, including Old North.

On one page the project envisions development attractive for live-work residents with occupations that have low client visitation needs. On another, the documentation refers to sharing parking between commercial and residential needs. You can't have both; shared parking depends on the residents' autos being gone all day, giving place to commercial parkers and office clients. Old North, which has part-time, semi-retired, home office and telecommuters mixed with some businesses, has already demonstrated that "shared parking" simply won't work for mixed commercial and live-work residential neighborhoods. It simply results in two users competing for the same spaces.

The proposed development will also add to the parking demand on Saturdays during the Farmers Market at Central Park by offsetting some of it elsewhere. Market days already place extra demand on adjacent neighborhoods such as Old North, when residents' autos are even more likely to be at home.

The problems associated with garbage and yard waste competing for parking space are discussed under 4.2-2 & 4.2-4 above.

4. "Create a new Central Park parking district .. a series of smaller (parking) lots." Create where? There are already too many small surface parking lots in downtown, an inefficient waste of space. Combined with the number of vacant lots and ugly single story 1960-70s buildings (e.g. the downtown Post Office building) in the commercial core area, all of which offer multi-use, multi-story redevelopment possibilities, one wonders why densification and multi-story multi-use development is being proposed for the project area at the expense of significant unmitigatable impacts on two adjacent traditional neighborhoods and historic & cultural resources. Increased surface parking in the commercial core would also have an adverse aesthetic impact on the downtown.

Both proposed parking structures (E Street and the School District site) are too far from the proposed development to be realistically used by residents or their visitors and can only be expected to be attractive to downtown commercial core users displaced from the project area. Fee parking is not attractive to student park-and-ride or residents seeking multi-day "storage" for week-end use autos; these will continue to use the adjacent neighborhoods. Both proposed structures are far future possibilities. The latter proposes use of property not under the City's control, and instead of "mitigation" will have predictable significant traffic, pollution, and aesthetic impacts on the Old North neighborhood and its cultural and historical resources

4.3 & 4.4 Historic Resources, Land Use & Aesthetics: impacts to these aspects are so intertwined in the project neighborhood that it is difficult see how the cumulative impacts can be adequately mitigated by the minor focused mitigations proposed.

In the 60s & 70s Davis engaged in a "redevelopment" binge that bulldozed whole blocks of the original downtown and a substantial proportion of the early housing stock, including all of the earliest large Victorian residences (Bullard, Weber, etc.) except the Hunt-Boyer Mansion complex. Dozens of the mid & large size bungalows of the downtown residential area were demolished, leaving Davis with a paucity of historic resources in the downtown compared to most towns its size. Not since that regrettable

exercise in self-destruction has there been a proposed project that threatens as many historic resources as the present Project: Sixteen historic residences, including an eligible Landmark, 2 Merit Resources, 1 eligible Merit Resource, and 11 potential Contributors to a Historic neighborhood District, including one entire “signature” face block (300 Block B St.) are threatened with outright demolition or serious loss of historic significance through re-location, radical alteration of setting in the form of massive high out of character new construction, and other significant, “unavoidable” (i.e. that cannot be mitigated) impacts.

As noted under “General” above, the impact on historic resources is severe. The proposed changes in the Guidelines reverse multiple previous policy statements from the General Plan on down, promoting preservation and adaptive reuse and discouraging demolition or removal of historic resources.

The vague language of the proposed changes and EIR continues to talk of “respecting” or “reflecting” the character of the neighborhood and its historic structures, while encouraging development that cannot realistically “respect” it in practice. Aside from the “disrespect” of removal, there is, for example, no realistic way in which a 3-story townhouse, fitted onto a narrow bungalow lot, extending from setback to setback, reducing the front yard to a “suggestion”, paving over the rest of the lot for parking and a second multi-story development facing the alley, can be said to “respect” or “reflect” the character of the traditional single story bungalow neighborhood. No matter how many “bungalow” or “revival” details (brackets, eaves, porch, etc.) are applied to such a development, it will not convey or respect the character or setting of the historic structure it replaces. At best, you may get well-designed post-modern architecture incorporating eclectic traditional architectural elements, but with height, mass and density completely other than the original character.

One proposed mitigation for loss of the historic structures is relocation, especially for a group of the “contributors,” to another of the traditional neighborhoods, such as city owned parcels in Old East intended for affordable housing. Relocation, even to another traditional neighborhood and with similar orientation and setting, is a measure advisable under the Secretary’s Standards (SIS) only as a sort of last resort to prevent demolition. However, the main significance of these contributing structures, especially the contiguous intact face blocks, is as a group in their historic neighborhood setting.

Unlike saving a single structure by relocation into a vacancy in a compatible neighborhood, relocation of a group whose main significance is its original setting, as a group, is very likely to convey a false sense of history in the target neighborhood. And essentially all that is being saved is the material resources used to construct the structures in the first place. While that minimal resource reuse is a desirable effort, it is a questionable object for a conservation policy document such as the Conservation District Design Guidelines to be promoting, and a very poor mitigation for loss of the original high-integrity historic neighborhood resource.

Similarly, preservation in place of the few designated and eligible structures is proposed as mitigation for impacts on them, but even relocation of those is envisioned. While

