

Exhibit I
Response to Comments
on the Tower District Specific Plan and
Tower District Design Standards and Guidelines
(comments received August 15, 2025 to September 29, 2025)

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Response to Comments on the Plan and Design Standards and Guidelines

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Table 1 presents the list of commenters, including the numerical designation for each comment letter received on the Plan, the author of the comment letter, the date of the comment letter, and the page number the comment begins on.

Table 1 List of Commenters

Letter No.	Commenter	Date	Page
STATE AGENCIES			
1	California Department of Transportation, District 6 Dave Padilla, Branch Chief, Local Development Review	8/25/2025	19
2	California Department of Fish and Game, Central Region, Julie A. Vance, Regional Manager	9/29/2025	22
3	State Center Community College District, Keisha Oliver, Executive Assistant to the Vice Chancellor, Operations	8/21/2025	29
LOCAL AGENCIES			
4	Fresno County Department of Public Works and Planning, Water and Natural Resource Division, Hector E. Luna, Principal Planner	8/15/2025	30
5	Fresno Irrigation District, Laurence Kimua, P.E. Chief Engineer	9/11/2025	33
6	San Joaquin Valley Air Pollution Control District, Daniel Montelongo, Director of Policy and Government Affairs	9/26/2025	43
7	Fresno Metropolitan Flood Control District, Denise Wade, Master Plan and Special Projects Manager	9/29/2025	56
BUSINESSES			
8	Producers Dairy Foods, Inc., Scott Shehadey, Owner and CEO	9/19/2025	65
9	Business Owners (La Tapitia, Patton, and Producers)	9/29/2025	69
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11	Neva Popenoe	9/29/2025	77
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13	South Tower Community Land Trust	9/29/2025	248

**COMMENT SUMMARY MATRIX for the PUBLIC REVIEW DRAFT TOWER DISTRICT SPECIFIC PLAN (AUGUST 2025)
and the PUBLIC REVIEW DRAFT TOWER DISTRICT DESIGN STANDARDS AND GUIDELINES (AUGUST 2025)**

This document contains contents pertaining to the Tower District Specific Plan and Tower District Design Standards and Guidelines. For response to comments on the Environmental Impact Report (EIR), please see the Final EIR for this project.

Abbreviations

TDSP = Tower District Specific Plan; TDDSG = Tower District Design Standards and Guidelines; and EIR = Environmental Impact Report

Letter #	Date	Commenter	Comment #	Comment	Plan Response
State Agencies					
1	8/25/2025	California Department of Transportation, District 6 Dave Padilla, Branch Chief, Local Development Review	1	The Specific Plan Objective C 4.2 states, “Initiate pedestrian improvements at the SR 180 Access Ramps.” Caltrans recognizes the importance of complete streets in supporting our mission to provide a safe and reliable transportation network that serves all people and respects the environment. Early involvement with Caltrans is recommended for City of Fresno complete street improvements on Fulton Street, Van Ness Avenue, and Belmont Avenue near the SR 180 access ramps. Caltrans Design Information Bulletin (DIB) Number 94, issued in accordance with the Director’s Policy on Complete Streets (DP-37), is a document that provides flexibility in the design of context-sensitive facilities that serve travelers of all ages and abilities, and would be beneficial guidance in the development of City complete street projects.	Recommendations and guidance received. See FEIR Response to Comments.
			2	It is important that the City of Fresno considers potential transportation safety impacts to the State Highway System during the Local Development Review (LDR) process. The February 2024 Caltrans Local Development Review Safety Practitioner’s Guidance, provides guidance for analyzing the safety impacts of proposed land use projects and plans on local roadways and prioritizes vulnerable road.	Recommendation received. See FEIR Response to Comments.
2	9/29/2025	California Department of Fish and Game, Central Region, Julie A. Vance, Regional Manager	1 thru 4	Comments made on DEIR Mitigation Measures BIO 1-a and BIO 1-b, DEIR Project Description, and project survey data collecting.	See FEIR Response to Comments.

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3	8/21/2025	State Center Community College District, Keisha Oliver, Executive Assistant to the Vice Chancellor, Operations	1	Pg. 119, the description under the picture cuts off: "Sidewalk gaps, as in the south Tower District area, are a barrier to" and doesn't finish.	Staff recommends revising page 119 photo caption to read as follows: "Sidewalk gaps, as in the south Tower District area, are a barrier to pedestrian comfort and safety."
Local Agencies					
4	8/15/2025	Fresno County Department of Public Works and Planning, Water and Natural Resource Division, Hector E. Luna, Principal Planner	1	The County recommends project specific traffic analysis should also include nearby County-maintained roads, such as N. Palm Avenue and N. Van Ness Blvd., which may be affected by the development approved by the City of Fresno. An analysis of these roads would help evaluate the project's impact on existing and future traffic and determine if and/or when additional infrastructure is needed.	See FEIR Response to Comments.
5	9/11/2025	Fresno Irrigation District, Laurence Kimua, P.E. Chief Engineer	1	This letter provides copies of the notices of availability (NOA) issued by the City and provides comments that primarily address the Fresno Irrigation District drainage facilities and water supply.	These topics are discussed in Chapter 6 of the Plan and the Section X, Hydrology and Water Quality, and XIX, Utilities and Service Systems, of the Draft EIR Appendix G Initial Study.
6	9/26/2025	San Joaquin Valley Air Pollution Control District, Daniel Montelongo, Director of Policy and Government Affairs	1 thru 17	Comments on AQ analysis and MMs	See FEIR Response to Comments.
7	9/29/2025	Fresno Metropolitan Flood Control District, Denise Wade, Master Plan and Special Projects Manager	1	For areas that have existing drainage facilities and propose changes to land uses that generate more runoff than originally planned, some type of mitigation to accommodate the increased flow such as parallel pipes and/or on-site retention may be required. FMFCD has identified properties within the Plan Area that may require some form of mitigation as noted on attached Figure 3.2. The properties may either make improvements to the existing pipeline system to provide additional capacity or may use some type of permanent peak reducing facility in order to eliminate adverse impacts on the existing system. Implementation of the mitigation measures may be deferred until the time of development.	Implementation of the mitigation measures offered here will be deferred until the time of development as suggested by FMFCD.

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7	9/29/2025	Fresno Metropolitan Flood Control District, Denise Wade, Master Plan and Special Projects Manager	2	Plan page 100, Local Streets and Alleys in reference to “green alleys”, FMFCD recommends the City incorporate policies addressing drainage capacity and structural elevation in alleys, particularly where upstream runoff could threaten adjacent property back yards and/or building structures. Alley grading shall be designed such that there are no adverse impacts to the passage of major storm flow. Additionally, development of alleys shall include surface flow easements or covenants for any portions of the developing area that cannot convey storm water to public right-of-way without crossing private property. FMFCD does not recommend the use of permeable pavers and pavements as Low Impact Development (LID) strategies, as these conflict with FMFCD’s requirements for positive drainage to the street. LID features often necessitate ongoing monitoring and maintenance, and they may become ineffective over time due to clogging.	Staff recommends edit to narrative on page 117 as follows: During Plan development, community members expressed interest in the significant potential of their existing alleys to be transformed into vibrant public spaces. There was particular interest in green alleys. The best green alleys integrate environmental sustainability, public safety, and designs that foster community engagement. Key components for Fresno could include the following: adequate lighting for public safety; lighter color paving surfaces, trees and other plantings to help make the area around it cooler during the hot summer months; materials with recycled content or locally sourced to reduce landfill waste, transportation emissions, and demand for new materials to improve air quality; and incorporating artwork (like murals), community gardens, and seating areas to transform neglected spaces into valued neighborhood assets and gathering spots. Green alleys are specially designed alleyways that use green infrastructure to manage stormwater, reduce flooding, and improve water quality. They often incorporate permeable pavers and pavement, landscaping, and other sustainable design elements to allow rainwater infiltration and filter pollutants from runoff. By including subsurface retention, a network of green alleys can even help municipalities avoid needing to expand stormwater infrastructure capacity, which can be costly. As mentioned in Chapter 6, Section 6.3 Stormwater and Drainage of this Plan, some localized flooding occurs during periods of heavy rain and stormwater quality is a concern.
Businesses					
8	9/19/2025	Producers Dairy Foods, Inc., Scott Shehadey, Owner and CEO	1a and 2	Figure 1.4 Community Components and Figure 2.3 Historic Resources and Districts - revise legend to say "Historic Designation Study Area" to be consistent with CHP 1.5.	Staff recommends edits to Figures 1.4 and 2.3 to change the words in the Legend from "Historic Districts - Proposed" and "Historic Districts - Proposed 2025" to "Historic Designation Study Area"
			1b	The EIR does not identify or acknowledge the area of South of Belmont, West of Broadway (page 3-16 and 3-17) as a planned/studied update or proposed historic district in the conservation and historic preservation section 3.6.1.	See FEIR Response to Comments.
			3	Figure 5.6 Existing and Planned Bike Lanes - express concern to the City regarding the inclusion of bike lanes on H Street. H Street is a designated truck route, and our priority remains the safety of both our team members and the community.	Figure 5.6 is a reflection of the Fresno Active Transportation Plan (ATP). The ATP is in the process of being updated. Please direct your comments to the City of Fresno Public Works Department and consider participating in the ATP update process.

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8	9/19/2025	Producers Dairy Foods, Inc., Scott Shehadey, Owner and CEO	4 and 5	Comments on DEIR Mitigation Measures AIR-1c, NOI-1a, and NOI-1b	See FEIR Response to Comments.
9	9/29/2025	Business Owners (La Tapitia, Patton, and Producers)	1	Figure 1.4 Community Components and Figure 2.3 Historic Resources and Districts - revise legend to say "Historic Designation Study Area" to be consistent with CHP 1.5.	Staff recommends edits to Figures 1.4 and 2.3 to change the words in the Legend from "Historic Districts - Proposed" and "Historic Districts - Proposed 2025" to "Historic Designation Study Area"
			2 and 3	Comments on DEIR Mitigation Measures AIR-1c, NOI-1a, and NOI-1b	See FEIR Response to Comments.
Individuals					
10	9/29/2025	Diana Diehl	1	The TDSP Update does not do enough to protect residents from the heavily negative effects of the nightlife, deferring mostly to a future "entertainment district overlay."	Thank you for your comment.
			2	Opposes the rezoning residential Dunbar Tracts (Taylor and Wheeler homes) at Dennett and Yosemite from residential to Commercial Main Street.	No rezones are proposed by this Specific Plan for these properties. These properties are curently zoned Commercial Main Street.
			3	Will everyone's "character-defining streetscape elements" be protected or only in certain areas, again? Street trees example.	Thank you for your comment.
			4	Opposes increased residential density	See FEIR Response to Comments.
			5	Expressed need for "vibrant commercial areas" to be good neighbors to "residents" through trash cleanup, washing sidewalks, and noise reduction.	Thank you for your comment.
			6	The updated Plan mentions "noise mitigation" in the context of the vibrant commercial areas negatively affecting adjacent residents, but fails to note that the residents should never be the sole notice/enforcement process.	Thank you for your comment.
			7	States that the Plan does not address mitigating the increased traffic on Olive Avenue and adjacent streets due to SR99 exit closures at Belmont and McKinley and due to HSR construction. Comments that this traffic will affect air quality, noise, and our quality of life.	See FEIR Response to Comments.

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Letter #	Date	Commenter	Comment #	Comment	Plan Response
10	9/29/2025	Diana Diehl	8	States that the Plan is fairly silent about neighborhood parking issues.	See FEIR Response to Comments.
			9	Not enough is mentioned in the Plan to address overparking in neighborhoods where development isn't required to match parking spaces with the building use.	Thank you for your comment.
			10	Utilities should be underground or concealed as much as possible in some sort of period-appropriate or decorative box especially when installed on private property or on residential streets.	Thank you for your comment.
			11	Expressed concern about Policy LU 5.4 "future street vending programs." Believes it is not equitable to divert commuter traffic from Olive to Dennett (the "Safe Route To School") for a weekly food truck event program that competes with local businesses. Street vending programs should be sensitive to and not competitive with existing local businesses, and road closures should be sensitive to school routes and the needs of and impact upon existing local residents.	Thank you for your comment.
			12	Believes the impact of short-term rentals should be addressed in the Plan especially vis-a-vis drinking and driving and the impact on visitor street parking	Thank you for your comment.
11	9/29/2025	Neva Popenoe	1	Requests existing residential properties that have industrial zoning designations be changed to residential zoning designations.	Thank you for your comment. See FEIR Response to Comments.
			2	Provide more park areas with green space. The plan lists schools and Ted C Wills as public areas and parks, but they have limited hours, and often do not allow families to have access to green space on weekends. Provide open space areas throughout the District, and don't include areas that are limited in access and space.	Parks are a permitted use in all zone districts. See FEIR Response to Comments.

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11	9/29/2025	Neva Popenoe	3	Restrict truck traffic through areas with residential properties. While many areas may be designated travel corridors, these are areas where people live, and should not be subject to air pollution because they have more affordable housing in these pockets. The people living along the corridors or in or adjacent to industrial zones do not deserve to have higher levels of pollution.	See FEIR Response to Comments.
			4	Require air monitoring throughout the district, particularly in industrial areas and travel corridors. Air quality monitors should be available for public viewing.	See FEIR Response to Comments.
			5	Do not limit density in any area. Infill should not be restricted in historical areas. Houses throughout the Tower district are more than 100 years old, and there is no reason one block should have special treatment because its historic connection as a better graded property zone. There is something troubling about continuing such a designation.	State law allows up to four units in single family residential zones.
			6	Provide better and more shelters at bus stops. In the hottest time of the year, I've seen people look like they were about to pass out waiting for the bus at the northeast corner of Olive and Van Ness and this is a designated sheltered bus stop. There is no shade at the seats during certain times of the day, and should not be considered a sheltered bus stop, as there is no shade near the bus stop. The bus stops along Olive and Fulton are some of the busiest and they have very few sheltered stops, and as stated, the shelters are grossly inadequate.	Thank you for your comment. Please see Policy C 1.8 and the need to work with FAX transit amenity requirements.

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Letter #	Date	Commenter	Comment #	Comment	Plan Response
12	9/29/2025	Chris Johnson (all comments apply to the TDDSG)	1	Overall Comment for the entire document: We need more photos, graphics and examples in the ‘white’ empty areas. I think the ones we have are great and very helpful. More will make this so much easirer to use and more representative of the Tower District! Pages specifically noted are: 10, 11, 13, 14, 16 - 18, 21, 22, 28, 29, 34, 35, 37 - 40, 42 - 47, 50, 51, 58, 61 - 64, 66, 68, 69, 70, 71, 73 - 82, 86 - 88, 91 - 93, 95 - 97, 100, 101, 103, 105 - 109, 111, 114, 115 - 122, 128, 132 - 137, and 139 - 145.	Staff recommends adding photos or graphics to approximately 30 pages to improve understanding of standards and/or guidelines on those pages.
			2	Page 16: Can we add something about smaller, entry level ownership housing through the use of ‘condos’ type and removing the barriers that prevents that from happening in CA.	Thank you for your comment.
			3	Page 17: think this is a good example for Blackstone but not sure we would want this in the core of the tower? The retail is single story.	Thank you for your comment.
			4	Page 32: We want to make sure that our standards do not allow garages on the front and dominate. The City standards will not protect us from that. Can we make that clear here?	Staff recommends revising G28, in all instances it appears in the document, to read as follows: It is preferred that g Garages and carports will be detached from the primary building and placed behind the primary building and toward the rear of the lot to limit visibility from the public street.
			5	Page 35: Note that this should be a balanced approach with the involvement of the neighborhood in developing any changes to accommodate bikes.	Thank you for your comment.
			6	Page 42 and 72, S86: Edit last sentence to, "Stucco shall not be used to replace or cover other materials	Staff recommends revising S86, in all instances it appears in the document, to read as follows: Exterior materials used in renovations of and additions to existing buildings shall be the same as one or more of the existing or original materials. Stucco shall not be used to replace or cover other materials.

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Letter #	Date	Commenter	Comment #	Comment	Plan Response
12	9/29/2025	Chris Johnson (all comments apply to the TDDSG)			Staff recommends revising G81, in all instances it appears in the document, to read as follows: Stucco is only appropriate for existing homes and new homes that mimic historical styles only when stucco was the original cladding material used for that style. In cases where stucco is appropriate, the method of application must match that originally used for such homes. Generally, modern stucco applications which are highly textured, such as spatter dash, are inappropriate on historic styles such as Mediterranean and Tudor, which used a smoother troweled finish. Conversely, the modern knock down smooth stucco style would be materially incompatible and aesthetically inconsistent with the traditional composition of historic period architecture and therefore also inappropriate to use in these circumstances.
			7	Page 43: Add G82 to cover the 'knock down' finishes	
			8	Page 44: How do we cover the moden styles in this?	Thank you for your comment.
			9	Page 44: We do have lots of examples of 'picture' windows on fronts of many homes. Should we write something to cover that?	Thank you for your comment.
			10	Page 45, G90: Should be 'true divided' lites	Staff recommends revising G90, in all instances it appears in the document, to read as follows: Windows may include glazing bars, or muntins. The addition of glazing bars can break up the house's façade and add texture to the building. On historical homes, the original muntin and pane pattern should be maintained when windows are replaced. However, it is in appropriate to install replacement windows with fake muntins true-divided lites when the original windows did not have muntins (i.e. were not multi-glazed).
			11	Page 45, G91: Certainly not 'white' vinyl that is so prevalent. Can we make any mention of them being dark colors? I don't know if we will be successful in not allowing vinyl replacements?	Thank you for your comment.
			12	Page 45, G97: Unless part of that particular defined style (Prairie or Craftsman)?	Staff recommends revising G97, in all instances it appears in the document, to read as follows: Each window should be individually articulated and windows should not form long horizontal or vertical bands unless part of that particular style.
			13	Page 46: They should be integrated in the design and not look like just added on.	Thank you for your comment.
			14	Page 48: Could we find a better example than this one? More 'tower district' like?	Staff recommends photo replacement on page 48 to better represent a typical accessory dwelling unit in the Tower District.

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12	9/29/2025	Chris Johnson (all comments apply to the TDDSG)	15	Page 62, S37: Is this more or different than the City standards?	This is different than the City standards.
			16	Page 98: Maybe find a better cleaner example without the sandwich board?	Staff recommends photo replacement on page 98 to one that does not include a sandwich board.
			17	Page 101: This is the Blackstone corridor that we have at our edges. Does this address it adequately? Might make a specific reference?	Staff recommends photo replacement on page 101 to one that is representational of a mixed-use building designed to minimize potential conflicts between residential and commercial uses adjacent to one another or within the same building.
			18	Page 125, S152: Why is this so limited?	Staff recommends revising S152, in all instances it appears in the document, to read as follows: Vertical blade signs shall be limited to hotels, cinemas, and live theaters only, and shall be limited to one per building all commercial uses.
			19	Page 125, Vertical Blade Sign photo: this would not be an allowed per the S152 standard?	Thank you for your comment.
			20	Page 142: Should there be anything to cover an ‘Cottage style’ for all the non craftsman homes?	Thank you for your comment.
			21	Page 144, Art Deco Example photo: Not clearly 'Art Deco'?	Thank you for your comment.
			22	Page 145: What about a general ‘modern’ style?	Thank you for your comment.
			23	Page 166: Credits and acknowledgments should definitely be added to recognize everyones hard work on this!!	Staff recommends adding list of acknowledgments to match those provided on the Acknowledgments page in the Tower District Specific Plan.
Interested Parties					
13	9/29/2025	South Tower Community Land Trust	1	Page 32, 2.1: It is appropriate to mention here that the growth to Tower District from Downtown was part of White Flight and redlining with racial covenants excluding many demographics from renting or owning homes or businesses north of Olive.	Thank you for your comment.
			2	Page 33: Health and equity section should note the loss of historic structures and threat of more historic structure loss with industrial expansion.	Thank you for your comment.

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13	9/29/2025	South Tower Community Land Trust	3	Page 41: The example images used for context sensitive infill development are not context sensitive. The massing and materials of both do not respect or reflect the buildings adjacent to them. A good example of context sensitive design is 541 @ South Tower. It is new construction but with urban massing and art deco design built in 2016. But it does not appear anywhere in the Specific Plan or Design Standards	Staff recommends photo replacement on page 41 to one of the 541 @ South Tower.
			4	Page 44, CHP 1.5: The historic survey of South of Belmont West of Broadway should place priority on identifying historic buildings and assets at risk from industrial expansion and deferred maintenance.	Thank you for your comment.
			5	Page 44, CHP 1.7: The Belmont phoenix palms and the deodar cedars should be mentioned here or under 2.2	Staff recommends edit of Policy CHP 1.7, in all instances that it occurs, to read as follows: CHP 1.7 Evaluate designation of potential resources in the public right-of-way. Using historic resource survey(s) and community engagement for guidance, identify and evaluate public realm design elements that may be eligible for historic designation. These elements should be researched for their historic significance and, if eligible, nominated for designation accordingly. Elements located in the Tower District that have been discussed as potential resources include but are not limited to the following: • Historic hitching posts • Van Ness Avenue “pineapple” streetlights • Historic signage • Sidewalk WPA stamps • Stone gateway features on Palm and Van Ness • Belmont phoenix palms • Deodar cedars
			6	Page 47, CHP 2.1: This would be stronger if it said “hold accountable property owners...” instead of the more passive “work to preserve...”	Thank you for your comment.

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13	9/29/2025	South Tower Community Land Trust	7	Land Use Map: During the land use map initiation meeting with Fresno City Council, Councilmember Nelson Esparza motioned to study 604 N. San Pablo Ave for rezone from RS-5 to Mixed Use. That motion was seconded and voted affirmatively by all councilmembers. That rezone does not appear to be included on any map or text in the plan or EIR. The 604 N. San Pablo Ave. The property is owned by South Tower CLT and we have aspirations to develop a mixed use development on site. We would like to see that Council vote honored and included in this plan.	Staff recommends changing the land use designation and zone district for 604 N. San Pablo Avenue to Neighborhood Mixed-use.
			8	Statements regarding Table 3.B and Section 3.6.2.3 in DEIR.	See FEIR Response to Comments.
			9	Page 66, Figure 3.2: “Please show the community feedback that requested this downzoning.”	Thank you for your comment.
			10	Page 66, Figure 3.2: The Cheese building and properties to its south need to be Public Facility with a NMX or CMS dual designation. It’s original designation should have been considered spot zoning. Keeping it industrial today is not incentivizing the property owner to maintain it per their covenant; instead it is incentivizing the continued use of the lot as an industrial parking lot in a residential neighborhood.	Thank you for your comment.
			11	Page 66, Figure 3.2: Light industrial zoning needs to have an asterisk similar to the Southwest Fresno Specific Plan to indicate the zoning will change when existing users leave. Or, there needs to be a policy committing the City to rezone this area should that occur. Office and Business Park should be examined as more neighborhood friendly alternatives.	Thank you for your comment.

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13	9/29/2025	South Tower Community Land Trust	12	Page 67, Section 3.6 Industrial and Employment Compatibility: This statement is out of balance. While they are an old company, they haven't always benefited the community. Instead they have a history of expansion into the neighborhood. Quantify "important" and what is the value of that importance compared to the health of their neighbors? Or opportunity costs of lack of space for other uses and lowered property values for the neighborhood?	Thank you for your comment.
			13	Page 67, Section 3.6 Industrial and Employment Compatibility: How many employees? I've only heard a statistic referencing a distance of ten miles which includes Clovis and therefore is not just the neighborhood.	Thank you for your comment.
			14	Page 67, Section 3.6 Industrial and Employment Compatibility: Can the City verify that a dairy plant is a light industrial use and not a heavy industrial use and what keeps it from being considered a heavy use?	Thank you for your comment.
			15	Page 79, LU 4.3: Drive throughs should not be allowed anywhere in the Tower District. Also, they are already not allowed in CMS.	Thank you for your comment.
			16	Page 81, LU 6.1: "Striving" is not a commitment. There is no try only do. "Consider...consider...explore..." this policy has no teeth and is simply lip service to the residents.	Thank you for your comment.
			17	Page 81, LU 6.1: Why aren't there any design standards for Employment Uses including Industrial?	Thank you for your comment.
			18	Page 81, LU 6.2: What about requiring CBAs anytime an industrial business wants to expand in the Tower?	Thank you for your comment.
			19	Page 82, LU 6.4: What is the point of this policy if it doesn't require more than what's already required?	Thank you for your comment.
			20	Comment on DEIR, page 81, requesting 64 acres of needed park space be shown in the Plan.	See FEIR Response to Comments.

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13	9/29/2025	South Tower Community Land Trust	21	Page 90, Figure 4.1: Bradway Parque is complete and should not be noted as “planned”	Staff recommends revising Tower District Specific Plan Figure 4.1 to remove the note "Planned Broadway Parque", change the color of the park to light green to match the designation in the legend for Existing Parks, and label the park "Braodway Parque" to match the label for Trolley Park.
			22	Page 90, Figure 4.1: The vacant property on Clinton on the western edge of the plan area is under development now.	Staff recommends revising Tower District Specific Plan Figure 4.1 to remove the vacant parcel designated on APNs 44405201 and 44405202, the concentric circle surrounding these properties, and the leader line from the green boxed note below.
			23	Page 93, Figure 4.3: The data shows that there needs to be a stronger commitment to parks. Potential new parks should be shown on the land use map to give the City more opportunities topotentially add park space.	Thank you for your comment. Parks are allowed in all zone districts.
			24	Page 94, Planned Parks: disagree, the original subway was probably better	Comment noted
			25	Page 96, Canalside Parks: herndon	Comment noted
			26	Page 97, Section 4.4: highlighted typo of the word, “currently”	Staff recommends the following edits on page 97 in Section 4.4: While the Tower District has no public library branch at this time, the community has been working with the Fresno County Public Library district to create a new branch, relocate an existing one, or enhance the quality of the Gillis Branch Library Branch , located on at 629 W. west Dakota Avenue. that currently serves the District.
			27	Page 101, POS 1.5: parking or parks?	Parking was the intended word. Thank you for your comment.
			28	Page 119, Section 5.5: highlighted text of unfinished sentence under image in margin, “Sidewalk gaps, as in the south Tower District area, are a barrier to...” incomplete sentence	See Staff recommendation in Letter 3, Comment # 1
			29	H Street and Weber are ideal for bicycle and pedestrian traffic to and from Tower District and Downtown. These roads should include pedestrian oriented lighting standards and protected bike lanes to keep those active transportation methods safe from truck traffic.	Thank you for your comment.

COMMENT SUMMARY MATRIX for the PUBLIC REVIEW DRAFT TOWER DISTRICT SPECIFIC PLAN (AUGUST 2025)
and the PUBLIC REVIEW DRAFT TOWER DISTRICT DESIGN STANDARDS AND GUIDELINES (AUGUST 2025)

Letter #	Date	Commenter	Comment #	Comment	Plan Response
13	9/29/2025	South Tower Community Land Trust	30	Page 155, Figure 6.5: The previous Tower District Specific Plan recommended a trail along Dry Creek Canal. The right of way along the canal has not been kept open to allow for a trail adjacent to the canal in many places. Undergrounding the canal into a pipe would allow for a trail above the canal and would reduce drowning risk, water contamination and evaporation. FID would be an essential partner in that work. Also FID is a potential blocker for development. Their requirements nearly stopped the development of the 541 @ South Tower development. FID needs to be proactively engaged.	Thank you for your comment.
			31	Although the City does not have direct control over electricity provision, it may be worthwhile to provide information on it since it can inhibit the development of new housing units, including ADUs. It also factors into sustainability and affordability. a. Recommendation: Work with PG&E to determine priorities for transformer replacement and undergrounding of power lines.	Staff recommends adding the following policy: POS 4.4 Removal of electrical provider barriers to new accessory dwelling unit development. Initiate a dialogue between the City of Fresno, Pacific Gas and Electric (PG&E), and residents to reach agreements around opportunities to remove barriers to accessory dwelling unit (adu) development. Work with PG&E to determine priorities for transformer replacement and undergrounding of power lines.

**COMMENT SUMMARY MATRIX for the PUBLIC REVIEW DRAFT TOWER DISTRICT SPECIFIC PLAN (AUGUST 2025)
and the PUBLIC REVIEW DRAFT TOWER DISTRICT DESIGN STANDARDS AND GUIDELINES (AUGUST 2025)**

Letter #	Date	Commenter	Comment #	Comment	Plan Response
13	9/29/2025	South Tower Community Land Trust	32	Section 6.4: Trash enclosure requirements for commercial and multifamily residential or mixed use projects can be a barrier to designing quality urban site plans. a. Recommendation: Allow for flexibility for urban developments on tight in-fill sites to utilize hand cart for solid waste, recycling and green waste rather than dumpsters. This will free up precious square footage for other uses while also encourage limiting waste produced on site. b. Recommendation: Add publicly accessible trash cans on sidewalks throughout the commercial corridors that can be emptied with automated lift of existing garbage trucks to reduce cost of trash collection and limit trash overflows and littering.	Staff recommends adding the following policy: POS 4.5 Removal of solid waste management provider barriers to designing quality urban site plans for new commercial, multi-family, and mixed-use development. Initiate a dialogue between the City of Fresno Planning and Development Department staff, Solid Waste Management Division staff, and residents to reach agreements around opportunities to remove barriers to to designing quality urban site plans for new commercial, multi-family, and mixed-use development. Dialogue should include the following: 1) Allow for flexibility for urban developments on tight in-fill sites to utilize hand cart for solid waste, recycling and green waste rather than dumpsters. This will free up precious square footage for other uses while also encourage limiting waste produced on site. 2) Add publicly accessible trash cans on sidewalks throughout the commercial corridors that can be emptied with automated lift of existing garbage trucks to reduce cost of trash collection and limit trash overflows and littering.
			33	Broadband internet access is a key equity issue. Recommendation: Identify areas of Tower District that lack broadband access. Work with broadband providers to encourage full coverage.	Thank you for your comment.
			34	Page 164, Section 7.4: Review Bodies this existing Tower District Design Review Committee that is an official committee of citizens appointed by the Mayor and City Councilmembers is not listed among the review bodies. Will that committee be dissolved? This may have some overlapping purpose with the description of the Tower District Specific Plan Implementation Committee and the Council District Project Review Committee. Additionally, the Council District Project Review Committees are listed twice.	Staff recommendation: delete second reference to Council District Review committees 1, 3, and 7 on page 165
			35	Page 166: Our organization is incorrectly listed as “South Tower Trust” our correct name is South Tower Community Land Trust [South Tower CLT]	Staff recommendation: revise "South Tower Trust to "South Tower Community Land Trust" on page 166

**COMMENT SUMMARY MATRIX for the PUBLIC REVIEW DRAFT TOWER DISTRICT SPECIFIC PLAN (AUGUST 2025)
and the PUBLIC REVIEW DRAFT TOWER DISTRICT DESIGN STANDARDS AND GUIDELINES (AUGUST 2025)**

Letter #	Date	Commenter	Comment #	Comment	Plan Response
13	9/29/2025	South Tower Community Land Trust	36	Page 190, Policy recommendations grid (orange): This row should have more negatives to reflect the negative health and equity outcomes of keeping industrial in the neighborhood.	Staff recommends edit to the Land Use table on page 190, in the first row, regarding Policy LU 6.1: Add two red negative symbols under Environmental Comfort below the two green plus signs.
			37	Noise Pollution - Despite public comments about noise pollution from the Producers Dairy industrial facility at Palm & Belmont, the three noise monitoring locations included in the EIR are nowhere near the Producers Dairy or an industrial zoned facility adjacent to residences. Without proper study of the existing noise levels near the industrial section of South Tower, there is no baseline for noise mitigation measures. Only 3 sound monitors were included in this plan. We believe an additional monitor should be included at Palm & Franklin to capture the industrial noise levels adjacent to residential. Given other comments about concern of night life noise levels on the Olive corridor, it is appropriate to capture data somewhere along the Olive corridor.	See FEIR Response to Comments.
			38	Light Pollution - The bright lights at Light Industrial businesses adjacent to residential uses has been uplifted during public comments as inappropriate for the peaceful enjoyment of those homes. A study of light pollution should be include in the EIR and mitigation measures should be proposed to limit light pollution bleeding from Industrial properties to residential ones.	See FEIR Response to Comments.

**COMMENT SUMMARY MATRIX for the PUBLIC REVIEW DRAFT TOWER DISTRICT SPECIFIC PLAN (AUGUST 2025)
and the PUBLIC REVIEW DRAFT TOWER DISTRICT DESIGN STANDARDS AND GUIDELINES (AUGUST 2025)**

Letter #	Date	Commenter	Comment #	Comment	Plan Response
13	9/29/2025	South Tower Community Land Trust	39	EIR Table 4.1.A does not include pollutants known to be included at the Producer’s Dairy facility. See 2019 settlement between EPA and Producers Dairy related to anhydrous ammonia. “Producers Dairy Foods’ industrial refrigeration system uses large quantities of anhydrous ammonia, a toxic chemical highly corrosive to skin, eyes and lungs.” https://www.epa.gov/newsreleases/us-epa-settlement-producers-dairy-foods-improves-chemical-safety-fresno-california	See FEIR Response to Comments.
			40	Design Standards - Most notably the design standards & guidelines contain no section for Industrial Districts. A large amount of residential single family and mixed-use zones are adjacent to light industrial zones. The conflict and lack of mitigation of negative impacts by industrial has been the topic of many public comments through this process. The Design Standards are an excellent places to include standards for those mitigations but that opportunity is completely ignored.	Thank you for your comment.

Comment Letters

(Received from August 15 through September 29, 2025)

LETTER 1

California Department of Transportation

DISTRICT 6 OFFICE
1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616
(559) 905-9371 | FAX (559) 488-4195 | TTY 711
www.dot.ca.gov

August 25, 2025

FRE-180-57.58

Notice of Availability -Tower District Specific Plan Update EIR
GTS #: <https://ld-igr-gts.dot.ca.gov/district/6/report/36453>

SENT VIA EMAIL

Sophia Pagoulatos
Planning Manager
City of Fresno – Planning and Development Department
2600 Fresno Street, Room 3043
Fresno, CA 93721
Sophia.Pagoulatos@fresno.gov

Dear Mx. Pagoulatos,

The California Department of Transportation (Caltrans), District 6 appreciates the opportunity to review and provide comments on the Notice of Availability (NOA) for the Environmental Impact Report (EIR) for the Tower District Specific Plan Update. Our comments are submitted pursuant to the California Environmental Quality Act (CEQA) and in our role as a responsible agency with jurisdiction over the State Highway System (SHS), particularly State Route 180 (SR-180), which lies within the Specific Plan boundaries.

The Specific Plan area is generally bounded by State Route (SR) 180 to the south, Blackstone Avenue to the east, Shields Avenue to the north, and Fruit Avenue and Union Pacific Railroad tracks to the west. As such, Caltrans has a direct interest in ensuring that proposed development does not adversely affect the operation or safety of the SHS.

The Specific Plan Objective C 4.2 states, "Initiate pedestrian improvements at the SR 180 Access Ramps." Caltrans recognizes the importance of complete streets in supporting our mission to provide a safe and reliable transportation network that serves all people and respects the environment. Early involvement with Caltrans is recommended for City of Fresno complete street improvements on Fulton Street, Van Ness Avenue, and Belmont Avenue near the SR 180 access ramps.

Caltrans Design Information Bulletin (DIB) Number 94, issued in accordance with the Director's Policy on Complete Streets (DP-37), is a document that provides flexibility in the design of context-sensitive facilities that serve travelers of all ages and abilities, and would be beneficial guidance in the development of City complete street projects.

Also, it is important that the City of Fresno considers potential transportation safety impacts to the State Highway System during the Local Development Review (LDR) process. The February 2024 Caltrans Local Development Review Safety Practitioner's Guidance, provides guidance for analyzing the safety impacts of proposed land use projects and plans on local roadways and prioritizes vulnerable road

The Draft EIR identifies several areas of controversy based on input received during the scoping process, including queueing near SR 180 ramps, increased vehicle miles traveled (VMT), and consistency with Statewide Transportation and Climate Plans. Caltrans supports the City's identification of these issues and recommends that the Final EIR provide additional clarity on how the Specific Plan Update will address them. This will ensure protection of the SHS and alignment with state and regional transportation objectives.

If you have any other questions, please call or email: Keyomi Jones, Associate Transportation Planner at (559) 981-7284 or keyomi.jones@dot.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Padilla', with a long horizontal flourish extending to the right.

David Padilla, Branch Chief
Local Development Review
dave.padilla@dot.ca.gov
(559) 905-9371

LETTER 2

California Department of Fish and Game



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



September 29, 2025

Sophia Pagoulatos, Planning Manager
City of Fresno, Planning and Development Department
2600 Fresno Street, Room 3065, Third Floor
Fresno, California 93721
(559) 621-8062
longrangeplanning@fresno.gov

**Subject: Draft Environmental Impact Report (DEIR)
Tower District Specific Plan Update (Project)
State Clearinghouse No.: 2025050309**

Dear Sophia Pagoulatos:

The California Department of Fish and Wildlife (CDFW) received a DEIR from City of Fresno, as Lead Agency, for the above-referenced Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802.). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Sophia Pagoulatos, Planning Manager
 City of Fresno
 September 29, 2025
 Page 2

agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, reasonably foreseeable future projects may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of reasonably foreseeable future projects may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PROJECT DESCRIPTION SUMMARY

Proponent: City of Fresno

Objective: The purpose of the proposed Project is to update the 1991 Tower District Specific Plan to create new housing, commercial, and recreational opportunities in the City of Fresno's Tower District. The proposed Project Update maintains the guiding principles from the 1991 Specific Plan while allowing for additional infill development, multi-unit housing, enhanced parks and public facilities, and the restoration and redevelopment of existing structures

Location: The Tower District (District) is an approximately 1,869-acre area located immediately north of Downtown Fresno and the State Route (SR) 180 freeway, and one mile east of the SR-99 corridor. The Tower District Specific Plan Area is centrally located within Fresno and is generally bounded by Shields Avenue to the north, Blackstone Avenue to the east, SR-180 to the south, and Fruit Avenue and the Union Pacific Railroad tracks to the west.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City of Fresno to adequately identify and/or mitigate the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments

Sophia Pagoulatos, Planning Manager
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 Page 3

or other suggestions may also be included to improve the CEQA document prepared for this Project.

Aerial imagery and information included in the DEIR indicate that the Project area is primarily composed of existing residential housing, as well as commercial, public institutions such as schools, and pockets of industrial uses. The highly disturbed nature of the Updated Plan area and the lack of suitable habitat limit the occurrence potential for plants and wildlife; however, the Biological Resource Evaluation (BRE) confirmed one special-status species with known or with potential to occur in the Biological Study Area (BSA), which included the Specific Plan Updated Area and a 500-foot buffer. Additionally, the BSA indicates that the Project area contains suitable habitat that could support a variety of ground-and tree-nesting bird species. Mitigation Measures BIO-1a and BIO-1b included in the DEIR may not be sufficient to minimize potential impacts to Western mastiff bat (*Eumops perotis californicus*) and nesting bird species protected under the Migratory Bird Treaty Act and California Fish and Game Code. CDFW recommends the following measures be incorporated in the Final Environmental Impact Report (FEIR) and implemented prior to initiation of construction activities associated with the Project.

Comment 1: Western Mastiff Bat

The DEIR notes that trees throughout the BSA could provide suitable roosting and foraging habitat for western mastiff bat (WMB). The WMB occurs in a wide variety of habitats including urban habitats. The WMB roosts in crevices on cliff faces, high buildings, trees, and tunnels. CDFW concurs with the activities intended to minimize potential Project impacts to WMB included in BIO-1a. However, for activities that will not require tree removal, CDFW recommends the FEIR include a 100-foot no-disturbance buffer to be placed around the identified bat roosts. If a maternity colony is identified, a 500-foot no disturbance buffer be placed around the roost until the young are no longer reliant on parental care. Additionally, the FEIR should require installation of new roost sites to be installed prior to the initiation of Project related activities to allow enough time for bats to relocate and attenuate.

Comment 2: Nesting Birds

CDFW concurs with the pre-activity nesting bird surveys described in Mitigation Measure BIO-1b. Additionally, CDFW recommends that Project construction be timed to avoid the bird breeding season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February 1 through September 15), the entity carrying out a specific project is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes.

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City of Fresno
September 29, 2025
Page 4

CDFW recommends that a qualified biologist conduct a habitat assessment and analysis of impacts to nesting birds as part of the biological technical studies prior to approval of subsequent projects resulting from this DEIR. Prior to ground-disturbance activities, surveys for active nests should be conducted, regardless of the initial results, no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests, that could potentially be impacted, are detected. As noted in the Mitigation Measure, surveys should cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

Further, if continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction areas would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Sophia Pagoulatos, Planning Manager
 City of Fresno
 September 29, 2025
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Editorial Comments and/or Suggestions

Lake and Streambed Alteration: The DEIR notes that Dry Creek Canal traverses the southern portion of the Project area. Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq., even when heavily modified. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's website (<https://wildlife.ca.gov/Conservation/LSA>) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to the CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to the CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

FILING FEES

The Project and/or subsequent projects resulting from this DEIR, could have an impact on biological resources, and an assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

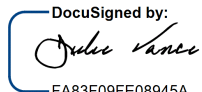
Sophia Pagoulatos, Planning Manager
City of Fresno
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CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City of Fresno in identifying and mitigating Project impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). If you have any questions regarding this letter or further coordination, please contact Marile Colindres, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 974-3452, or by electronic mail at marile.colindres@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...
Julie A. Vance
Regional Manager

ec: State Clearinghouse
Governor's Office of Land Use and Climate Innovation
State.Clearinghouse@lci.ca.gov

LETTER 3
State Center Community College District

From: [Kiesha Oliver](#)
To: [LongRangePlanning](#)
Subject: TDSP Public Review Draft
Date: Thursday, August 21, 2025 8:49:11 AM

External Email: Use caution with links and attachments

This isn't really a comment for the plan, just reporting a typo:

<https://www.fresno.gov/wp-content/uploads/2025/08/2025-8-13-TDSP-Public-Review-Draft-sm.pdf>

Pg. 119, the description under the picture cuts off: "Sidewalk gaps, as in the south Tower District area, are a barrier to" and doesn't finish.

Kiesha Oliver *(she, her, hers)*
Executive Assistant to the Vice Chancellor, Operations
Direct: 559-243-7182 **Operations:** 559-243-7200

STATE CENTER COMMUNITY COLLEGE DISTRICT

1171 Fulton Street, Fresno Ca. 93721

LETTER 4

Fresno County Department of Public
Works and Planning

From: [Luna, Hector](#)
To: [Sophia Pagoulatos](#)
Cc: [Hines, Brody](#)
Subject: RE: Tower District Specific Plan EIR Notice of Availability
Date: Friday, August 15, 2025 11:45:03 AM
Attachments: [image003.png](#)
[image005.png](#)

External Email: Use caution with links and attachments

The County recommends project specific traffic analysis should also include nearby County-maintained roads, such as N. Palm Avenue and N. Van Ness Blvd., which may be affected by the development approved by the City of Fresno. An analysis of these roads would help evaluate the project's impact on existing and future traffic and determine if and/or when additional infrastructure is needed.

Regards,



Hector E. Luna | **Principal Planner**
Department of Public Works and Planning |
Water and Natural Resources Division
2220 Tulare St. 6th Floor Fresno, CA 93721
Main Office: (559) 600-4292 | Direct: (559) 600-9672
Email: hluna@FresnoCountyCa.gov
[Your input matters! Customer Service Survey](#)

LETTER 5
Fresno Irrigation District



2907 S. Maple Avenue
Fresno, California 93725-2208
Telephone: (559) 233-7161
Fax: (559) 233-8227

CONVEYANCE. COMMITMENT. CUSTOMER SERVICE.

September 11, 2025

Sophia Pagoulatos
Planning and Development Department
City of Fresno
2600 Fresno Street
Fresno, CA 93721

RE: Notice of Availability of an Environmental Impact Report for the Tower District Specific Plan

Dear Ms. Pagoulatos:

The Fresno Irrigation District (FID) has reviewed the Notice of Availability of an Environmental Impact Report for the Tower District Specific Plan (Project). We appreciate the opportunity to review and comment on the subject documents for the proposed project. FID's comments are as follows:

Impacted Facilities

1. FID has a canal within the Project Area as shown on the attached FID exhibit map. The facility is Dry Creek Canal No. 75. FID's canals range from smaller diameter pipelines to large open canals. In most cases, the existing facilities will need to be upgraded to meet then-current urban standards and increase accessibility. FID will impose the same conditions on future projects as it would with any other project located within the common boundary of the City of Fresno and FID. FID will require that it review and approve all maps and plans which impact FID canals and easements.
 - a. Large Canal Crossing – The Dry Creek Canal No. 75 is a large canal and will more than likely be too large to be contained within a pipeline. Development impacts to this facility shall require designs that protect the canal's integrity for an urban setting including the need for access and full right-of-way widths for FID's operations and maintenance needs.
2. FID's facility within the Planning Area carries irrigation water for FID users and recharge water for the City of Fresno, during the irrigation season and flood waters during the winter months.
3. Canal Access – FID will continue to access the Canal from public roads. In order

to access the maintenance bank with our larger equipment, FID requires a drive approaches wide enough to accommodate the equipment. FID requires a 50-foot wide drive approach narrowing to a 20 feet wide drive banks. The 50-foot width is defined as starting from the end portion of a bridge/railing outward (away from the bridge). Every road and canal intersection is different and therefore each access will be different. The major factors affecting the proposed width will be the angle of the road intersecting the Canal, grade of canal bank vs. City road, median vs. no median, etc.

- a. If guard railings extend beyond attachment points at each wing-wall, they will obstruct FID's access to the canal and additional right-of-way will need to be acquired. FID will require the developer demonstrate FID's longest vehicle will be able to make the turns onto the drive banks. FID's right-of-way is a minimum 20-feet from the canal hinge on both sides of the canal, and FID will require the developer acquire and dedicate to FID exclusive easements for this purpose.
4. Canal Banks – If there will be any work on canal banks, the following will apply:
- a. All in-channel disturbed soil shall be concrete lined (both side slopes and bottom). FID will require reinforced concrete to limit the on-going maintenance that typically occurs with gunite or shotcrete slope protection.
 - b. Drive banks must be sloped a minimum of 2% away with a maximum of 4% from the canal with provisions made for rainfall. Drainage will not be accepted into the Canal and must be routed away from FID property/drive banks. Runoff must be conveyed to nearby public streets or drainage system by drainage swales or other FID acceptable alternatives outside FID's easements/property.
 - c. All existing trees, bushes, debris, old canal structures, pumps, canal gates, and other non- or in-active FID and private structures must be removed within FID's property/easement and the City's project limits.
5. Trail - It is FID's understanding that many trails are master-planned within the Project Area. The following requirements are intended for trail projects adjacent to FID-owned properties and rights-of-ways for open canals:
- a. FID will not allow the trail easement to be in common use with FID-owned property or easements.
 - b. FID requires all trail improvements be placed outside of FID-owned properties and easements.

- c. FID will not allow any portion of a tree canopy to encroach within its properties or easements.
- d. FID's canals will not accept any drainage from the trail or the canal bank.
- e. FID may require some improvements be made to the canal depending on the existing canal condition, the proposed trail, and the adjacent development.
- f. City parks that are adjacent to open canals are treated the same as trails, therefore the same requirements shall apply.

Water Supply Impact

1. The document must consider whether the City's Water Master Plan may impact the developments within the Planning Area. The report must consider and evaluate the City's growth within the planning area and any other concerns including climate change, and whether the City's Water Master Plan can still provide the necessary guidance for the City.
2. The City of Fresno has implemented many of the projects previously proposed in the City's Water Master Plan. The Proposed document should consider and evaluated whether the constructed projects have resulted in benefits that were anticipated.
3. Any changes in land use should be such that the need for water is minimized and/or reduced so that groundwater impacts to the proposed project area and any surrounding areas are eliminated.
4. If treated surface water will be used and the City has a deficit water supply or groundwater levels continue to drop, the City must acquire additional water from a water purveyor, such as FID for that purpose, so as to not impact water supplies to or create greater water supply deficits in other areas of the City or in the groundwater basin. Water supply issues must be resolved before any further "hardening" of the water supply demand is allowed to take place.
5. The potential for increase in water consumption by the project will result in additional groundwater overdraft. There is a significant cone of depression beneath the City of Fresno. FID is concerned that the increased water demand due to a change in land use may have a significant impact to the groundwater quantity and/or quality underneath the City of Fresno, FID and the Kings Groundwater Sub-basin. The "demand" side of water consumed needs to be evaluated or scrutinized as much as the "supply" side of the water supply. Many of the areas are historically native, and/or rural residential with minimal to no water use. Under current circumstances the project area is experiencing a

modest but continuing groundwater overdraft. Should the proposed project result in a significant increase in dependence on groundwater, this deficit will increase. FID recommends the City of Fresno require proposed projects balance anticipated groundwater use with sufficient recharge of imported surface water in order to preclude increasing the area's existing groundwater overdraft problem.

6. California enacted landmark legislation in 2014 known as the Sustainable Groundwater Management Act (SGMA). The act requires the formation of local groundwater sustainability agencies (GSAs) that must assess conditions in their local water basins and adopt locally-based management plans. FID and the City of Fresno are members of the North Kings Groundwater Sustainability Agency which will manage the groundwater basin within the FID service area. This area is in an over drafted groundwater basin and SGMA will impact all users of groundwater and those who rely on it. The City of Fresno should consider the impacts of the project on the City's ability to comply with the requirements of SGMA.

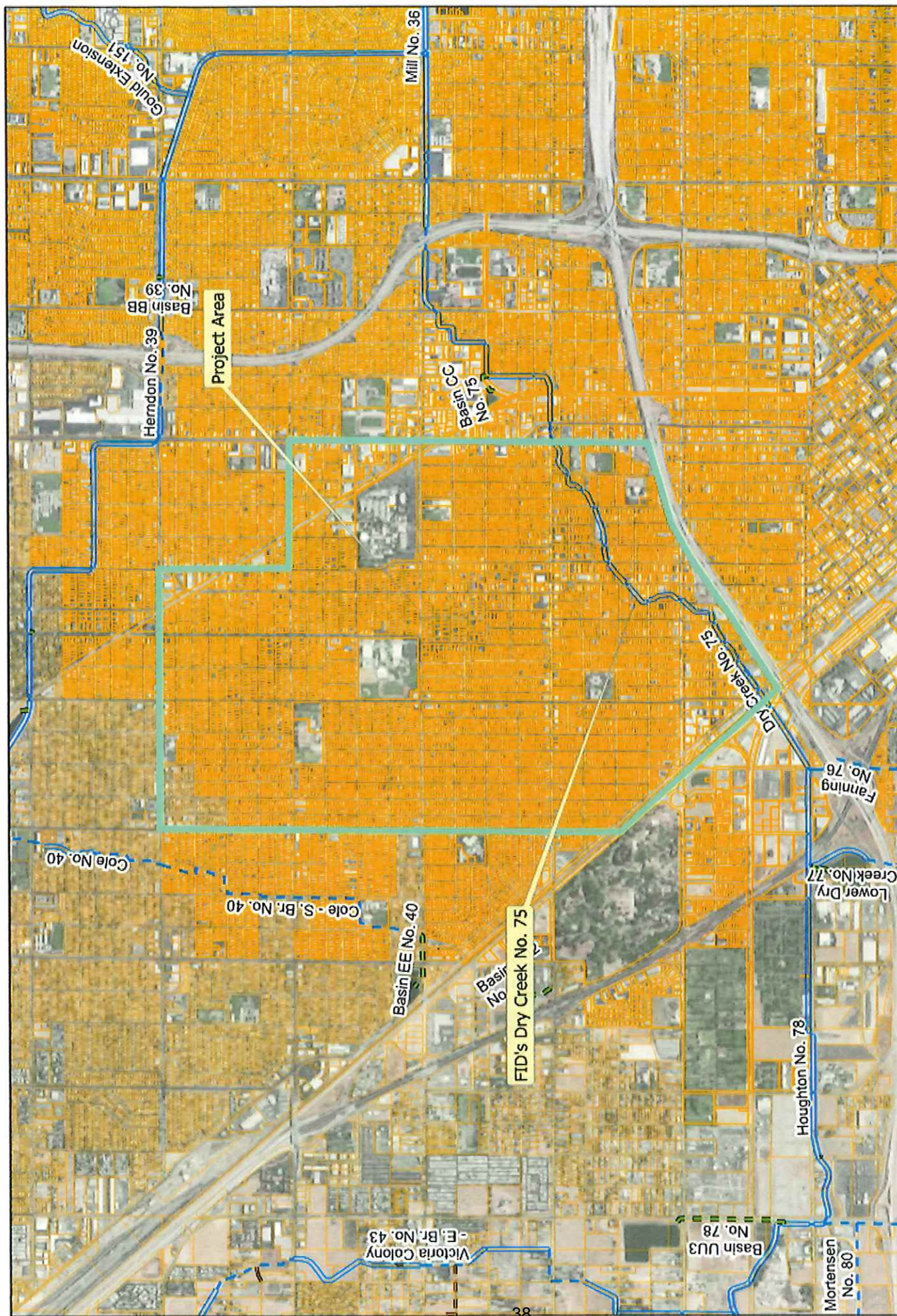
Thank you for making available to us the Notice of Preparation of a Program Environmental Impact Report for our review and allowing us the opportunity to provide comments. We appreciate the opportunity to review and comment on the subject documents for this project. If you have any questions, please feel free to contact me Jeremy Landrith at (559) 233-7161 extension 7407 or jlandrith@fresnoirrigation.com.

Sincerely,



Laurence Kimura, P.E.
Chief Engineer

Attachments



Legend

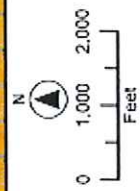
- FID Canal
- FID Pipeline
- Private Canal
- Private Pipeline
- Abandoned Canal
- Abandoned Pipeline
- Stream Group
- Other-Creek/River
- Other-Pipeline
- FID Boundary
- Railroad
- Streets & Hwys
- FID/CD Acquired Basins
- FID/CD Proposed Basins

FRESNO IRRIGATION DISTRICT

Esri, Maxar, Earthstar Geographics, and the GIS User Community

Spatial Reference:
NAD 1983 StatePlane California N TIPS 5004

This map was produced by the Fresno Irrigation District and is provided for reference and informational purposes only and is not intended to show map scale accuracy or all inclusive map features, nor for legal purposes. FID makes no statements regarding the accuracy of this map as the features shown are in their approximate location. Please contact the FID Engineering Dept. at (559) 233-7161 for further information on FID facilities.



Part: 5/1/2024-05 Pro Master.aprx

Christopher Lundeen

Doc
a/29

From: Sophia Pagoulatos <Sophia.Pagoulatos@fresno.gov>
Sent: Friday, August 15, 2025 8:30 AM
To: LongRangePlanning
Subject: Tower District Specific Plan EIR Notice of Availability

Some people who received this message don't often get email from sophia.pagoulatos@fresno.gov. [Learn why this is important](#)

NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL IMPACT REPORT FOR THE TOWER DISTRICT SPECIFIC PLAN UPDATE

Notice is hereby given that the City of Fresno (City), as the Lead Agency, has completed the Draft Environmental Impact Report (EIR) for the Tower District Specific Plan Update ("Specific Plan Update" or "proposed project"), which is being distributed for public review pursuant to the California Environmental Quality Act (CEQA) and the California Public Resources Code.

PROJECT LOCATION

The proposed project will apply to development in the Tower District located within the City of Fresno. The Tower District Specific Plan Area (Specific Plan Area) consists of approximately 1,869 acres, is centrally located within Fresno and is home to approximately 20,200 residents. The Tower District is generally bound by Shields Avenue to the north, Blackstone Avenue to the east, SR-180 to the south, and Fruit Avenue and the Union Pacific Railroad tracks to the west. The Tower District is the geographic area for which the Specific Plan Update establishes policies related to conservation, future growth, and change.

PROJECT DESCRIPTION

The proposed project would update the 1991 Tower District Specific Plan (1991 Specific Plan) to respond to both continuing and new issues in the Tower District. Recent decades have led to greater emphasis on housing availability and affordability, expanding recreational opportunities, and calming auto-oriented roadways. At the same time, the Specific Plan Update maintains the guiding principles from the 1991 Specific Plan and continues the focus on neighborhood character, walkability, and historic resources.

The intent of the proposed project is to provide strategic and comprehensive guidance for making decisions regarding the Tower District's built environment and landscape character, land use and activities, public open space, community facilities, transportation, and other forms of infrastructure within the Specific Plan Area. The Specific Plan Update establishes a set of goals, objectives, policies, and implementing actions for both neighborhood conservation and the future growth and change of the Specific Plan Area. The Specific Plan Update also aids in implementing the broader goals and policies for the City of Fresno, outlined in the General Plan, in a manner that can better meet the needs of the Tower District. This update is intended to streamline development within the Specific Plan Area by updating the Specific Plan's environmental analysis pursuant to CEQA requirements, and by providing a current regulatory framework and applicable mitigation measures.

The proposed project would also implement land use changes that would maintain and enhance the character-defining elements associated with the Tower District while allowing for future growth. The Specific Plan Update would promote more mixed-use development along commercial corridors by re-designating a portion of Blackstone Avenue from neighborhood mixed use to corridor/center mixed-use and by re-designating a portion of Shields Avenue from office to neighborhood mixed-use areas, specifically on Blackstone Avenue and Shields Avenue. The Specific Plan Update would also expand the Apartment House (AH) Overlay zoning designation along Olive Avenue, from North Fruit Avenue to North Echo Avenue, and allow medium low density residential uses at Terrace Gardens, Porter Tract, and Wilson Island. Additionally, the existing Tower District Design Guidelines adopted in 2005 are proposed to be updated by the Tower District Design Standards and Guidelines as part of the proposed project. The updated Design Standards and Guidelines reflect the policy direction of the Specific Plan Update and are intended to result in compatible development.

DOCUMENT AVAILABILITY

Hard copies of the Draft EIR, Specific Plan, and Design Standards and Guidelines are available for review at the following locations:

City of Fresno

Planning and Development Department

2600 Fresno Street, Room 3065, Third Floor

Fresno, CA 93721

Monday through Friday: 8:00 a.m. to 5:00 p.m. Saturday and Sunday: Closed

City of Fresno Central Library

2420 Mariposa Street

Fresno, CA 93721

Monday through Thursday: 10:00 a.m. to 7:00 p.m. Friday and Saturday: 10:00a.m. to 5:00 p.m.

Sunday: 12:00 p.m. to 5:00 p.m.

Gillis Branch Library

629 West Dakota Avenue

Fresno, CA 93705

Monday through Thursday 9:00 a.m. – 7:00 p.m. Friday and Saturday 9:00 a.m. – 5:00 p.m.

Sunday: Closed

The Draft EIR, Specific Plan, and Design Standards and Guidelines are also available on the City's website at:

www.fresno.gov/tdsp

Documents incorporated by reference can be viewed at the Planning and Development Department.

PUBLIC COMMENT PERIOD

The City of Fresno will receive public comments on the Draft EIR from August 15, 2025, through September 29, 2025. Comments will also be received on the Specific Plan and Design Standards and Guidelines. Written comments should be received no later than 5 pm (PST) on September 29, 2025. Please send your written comments to the Planning and Development Department and include your name, address, and phone number and/or email address so that we may contact you for clarification, if necessary. Comments may be made in person, by first class mail, facsimile or email to:

Sophia Pagoulatos, Planning Manager
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065, Third Floor
Fresno, CA 93721
Email: longrangeplanning@fresno.gov

ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS

The Draft EIR identifies potential significant effects in the following areas:

- Air Quality
- Biological Resources
- Cultural Resources
- GHG
- Noise
- Recreation

All other environmental issues were determined to have no impact, less than significant impacts, or less than significant impacts with mitigation measures incorporated. Mitigation measures identified in the Draft EIR would reduce the potentially significant effects to a less-than-significant level in all areas except Recreation.

Pursuant to CEQA Guidelines 15087(c)(6), the notice shall include presence of a site on any of the lists of sites enumerated under Section 65962.5 of the Government Code, including but not limited to, lists of hazardous waste facilities, land designated as hazardous waste property, hazardous waste disposal sites and others, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section. There is one site within the Specific Plan Area identified as an evaluation site consistent with Government Code Section 65962.5.

Sophia Pagoulatos | Planning Manager
Long Range Planning | Planning & Development
City of Fresno | 2600 Fresno St | Fresno CA 93721
559.621.8062

Sophia.Pagoulatos@Fresno.gov



Resources: [Long Range Planning](#) | [GIS & Mapping](#)
[Citywide Development Code](#) | [Plans & Projects Under Review](#)

LETTER 6
San Joaquin Valley Air Pollution
Control District



September 26, 2025

Sophia Pagoulatos
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3043
Fresno, CA, 93721

Project: Draft Environmental Impact Report for the Tower District Specific Plan Update

District CEQA Reference No: 20250949

Dear Ms. Pagoulatos:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) from the City of Fresno (City) for the Tower District Specific Plan Update. Per the DEIR, the project consists of providing strategic and comprehensive guidance for making decisions regarding built environment and landscape character, land use activities, public open space, community facilities and transportation (Project). The Project area is located East Shields Avenue to the north, North Blackstone Avenue to the east, State Route 180 to the south, North Fruit Avenue and Union Pacific Railroad tracks to the west, in Fresno, CA. A portion of the Project lies within one of the communities in the state selected by the California Air Resources Board (CARB) for investment of additional air quality resources and attention under Assembly Bill (AB) 617 (Garcia) in an effort to reduce air pollution exposure in impacted disadvantaged communities. See Figure 1 below.

Samir Sheikh

Executive Director/Air Pollution Control Officer

Northern Region

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

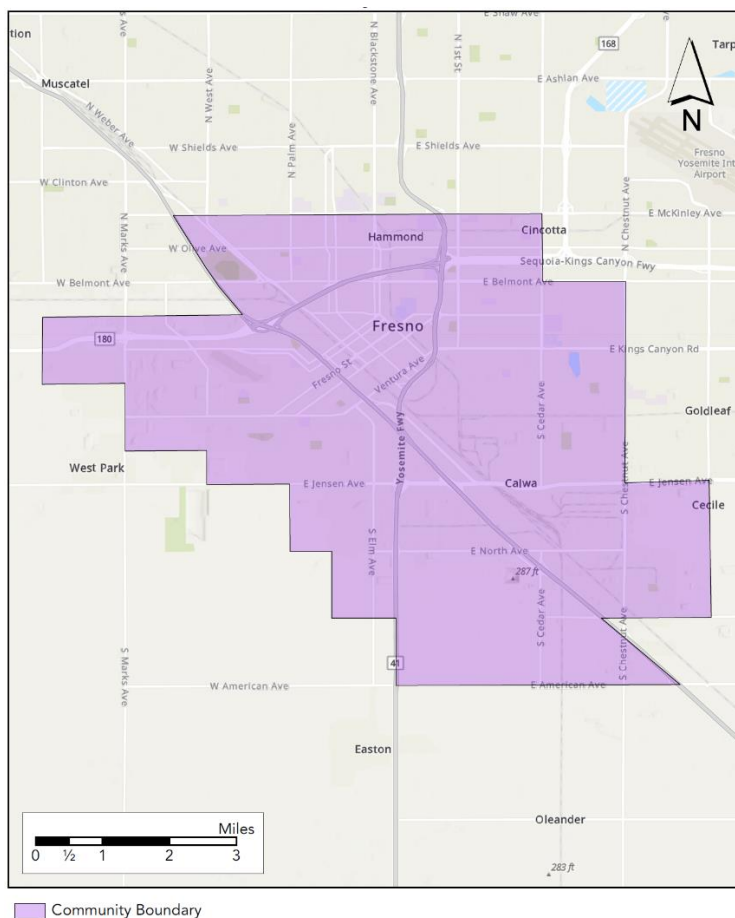
Central Region (Main Office)

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

Figure 1: Boundaries of the South Central Fresno AB617 Community



The District offers the following comments at this time regarding the Project:

1) Ongoing Commitment to Strengthen Working Relationship

The District appreciates the City's ongoing commitment to strengthen the working relationship with the District, in identifying and mitigating impacts on air quality through the California Environmental Quality Act (CEQA) review process.

Consistent with this cooperative effort and in order to address air quality impacts and concerns prior to future development projects occurring, the District recommends that the City develop administrative mechanisms and policies that ensure consistency in providing the District with information about projects under consideration by the City, such as land use designation, project size, and proximity to sensitive receptors and existing emission sources. To aid the City in determining a project's potential impacts, the District recommends the City provide an assessment evaluating potential project construction and operation related to air

quality impacts to the District as early as possible. Additionally, the District is available to work with the City and project applicants on future development projects to address air quality impacts and concerns. The District encourages the City to include guidance in relevant planning documents or development review procedures that advises project applicants to reach out and work with the District. The District's goal is to assist with enhancing project designs in the early stages of the planning process for a better overall project with minimized impact on air quality and early identification of feasible mitigation measures.

2) Land Use Planning

Nearly all development projects within the San Joaquin Valley Air Basin, from the Tower District Specific Plan Update to individual projects have the potential to generate air pollutants, making it more difficult to attain state and federal ambient air quality standards. Land use decisions are critical to improving air quality within the San Joaquin Valley Air Basin because land use patterns greatly influence transportation needs, and motor vehicle emissions are the largest source of air pollution in the Valley. Land use decisions and project design elements such as preventing urban sprawl, encouraging mix-use development, and project design elements that reduce vehicle miles traveled (VMT) have proven to be beneficial for air quality. The District recommends that the Project incorporate strategies that reduce VMTs and require the cleanest available heavy duty trucks, vehicles, and off-road equipment, including zero and near-zero technologies. VMTs can be reduced through encouragement of mix-use development, walkable communities, etc. Additional design element options can be found at:
<https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf>

3) Assembly Bill 617

AB 617 requires CARB and air districts to develop and implement Community Emission Reduction Programs (CERPs) in an effort to reduce air pollution exposure in impacted disadvantaged communities, like those in which the Project is located. The South Central Fresno AB 617 community is one of the statewide communities selected by CARB for development and implementation of a CERP.

Following extensive community engagement and collaboration with the Community Steering Committee, the CERP for the South Central Fresno Community was adopted by the District's Governing Board in September 2019 and by CARB in February 2020.

During the development of the CERP, the Community Steering Committee expressed concerns regarding the proximity of emission sources to nearby sensitive receptors like schools, homes, day care centers, and hospitals, and the potential future industrial development within the community that may exacerbate the cumulative exposure burden for community residents. The Community Steering

Committee also expressed the desire for more meaningful avenues of engagement surrounding the land-use decisions in the area. As these issues can most effectively be addressed through strong partnerships between community members and local land-use agencies. Furthermore, the District recommends the City assess the emission reductions measures and strategies included in the CERP and address them in the Project, as appropriate, to align the City work with the air pollution and exposure reduction strategies and measures outlined in the CERP.

For more information regarding the CERP approved for South Central Fresno, please visit the District's website at:
<https://community.valleyair.org/selected-communities/south-central-fresno>

4) Construction Emissions

The District recommends, to further reduce impacts from construction-related diesel exhaust emissions, future development projects should utilize the cleanest available off-road construction equipment.

5) Health Risk Screening/Assessment

Currently, Mitigation Measure AIR-1b only requires environmental evaluation of development proposals for new industrial or warehousing land uses that: (1) have the potential to generate 100 or more truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and (2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use. In urban areas, sources such as gasoline service stations, autobody shops, and metal fabricators have the potential to cause significant health impacts due to their operational emissions. Therefore, the District recommends that this mitigation measure be applied to all non-residential sources where operations have the potential to emit toxic air pollutants, regardless of the number truck trips and distance to sensitive receptors/land use.

6) Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. The District recommends an AAQA be performed for any future development projects that may be approved under implementation of the Project with emissions that exceed 100 pounds per day of any pollutant.

An AAQA uses air dispersion modeling to determine if emission increase from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. An acceptable analysis would include emissions from both project-

specific permitted and non-permitted equipment and activities. The District recommends consultation with District staff to determine the appropriate model and input data to use in the analysis.

Specific information for assessing significance, including screening tools and modeling guidance, is available online at the District's website:
<https://ww2.valleyair.org/permitting/ceqa/>.

7) Allowed Uses Not Requiring Project-Specific Discretionary Approval

In the event that the City determines that a project be approved as an allowed use not requiring a project-specific discretionary approval, the District recommends the Tower District Specific Plan Update include language requiring such projects to prepare a technical assessment, in consultation with the District, to determine if additional analysis and/or mitigation is required.

8) Truck Routing

Truck routing involves the assessment of which roads Heavy Heavy-Duty (HHD) trucks take to and from their destination, and the emissions impact that the HHD trucks may have on residential communities and sensitive receptors.

The District recommends the City evaluate HHD truck routing patterns for future development projects, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. This evaluation would consider the current truck routes, the quantity and type of each truck (e.g., Medium Heavy-Duty, HHD, etc.), the destination and origin of each trip, traffic volume correlation with the time of day or the day of the week, overall Vehicle Miles Traveled (VMT), and associated exhaust emissions. The truck routing evaluation would also identify alternative truck routes and their impacts on VMT and air quality.

9) Cleanest Available Heavy-Duty Trucks

The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from HHD trucks, the single largest source of NOx emissions in the San Joaquin Valley. Accordingly, to meet federal air quality attainment standards, the District's ozone and particulate matter attainment plans rely on a significant and rapid transition of HHD fleets to zero or near-zero emissions technologies.

For future development projects, the District recommends that the following measures be considered by the City to reduce Project-related operational emissions:

- *Recommended Measure:* Fleets associated with operational activities utilize the cleanest available HHD trucks, including zero and near-zero technologies.

- *Recommended Measure:* All on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) utilize zero-emissions technologies.

10)Reduce Idling of Heavy-Duty Trucks

The goal of this strategy is to limit the potential for localized PM_{2.5} and toxic air contaminant impacts associated with the idling of Heavy-Duty trucks. The diesel exhaust from idling has the potential to impose significant adverse health and environmental impacts.

If future development projects are expected to result in HHD truck trips, the District recommends the Tower District Specific Plan Update include measures to ensure compliance of the state anti-idling regulation (13 CCR § 2485 and 13 CCR § 2480) and discuss the importance of limiting the amount of idling, especially near sensitive receptors.

11)Under-fired Charbroilers

Future development projects have the potential to include restaurants with under-fired charbroilers. Such charbroilers may pose the potential for immediate health risk, particularly when located in densely populated areas or near sensitive receptors.

Since the cooking of meat can release carcinogenic PM_{2.5} species, such as polycyclic aromatic hydrocarbons, controlling emissions from new under-fired charbroilers will have a substantial positive impact on public health. The air quality impacts on neighborhoods near restaurants with under-fired charbroilers can be significant on days when meteorological conditions are stable, when dispersion is limited and emissions are trapped near the surface within the surrounding neighborhoods. This potential for neighborhood-level concentration of emissions during evening or multi-day stagnation events raises air quality concerns.

Furthermore, reducing commercial charbroiling emissions is essential to achieving attainment of multiple federal PM_{2.5} standards. Therefore, the District recommends that the Tower District Specific Plan Update include a measure requiring the assessment and potential installation, as technologically feasible, of particulate matter emission control systems for new large restaurants operating under-fired charbroilers.

The District is available to assist the City and project proponents with this assessment. Additionally, the District is currently offering substantial incentive funding that covers the full cost of purchasing, installing, and maintaining the system during a demonstration period covering two years of operation. Please contact the District at (559) 230-5800 or technology@valleyair.org for more information, or visit:

<https://ww2.valleyair.org/grants/restaurant-charbroiler-technology-partnership/>

12)Vegetative Barriers and Urban Greening

For future development projects within the Project area, and at strategic locations throughout the Project area in general, the District suggests the City consider incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (e.g., residences, schools, healthcare facilities).

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the uptake of gaseous pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery.

13)Clean Lawn and Garden Equipment in the Community

If future development projects consists of residential and commercial development, gas-powered residential and commercial lawn and garden equipment have the potential to result in an increase of NOx and PM2.5 emissions. Utilizing electric lawn care equipment can provide residents with immediate economic, environmental, and health benefits. The District recommends the Project proponent consider the District's Clean Green Yard Machines (CGYM) program which provides incentive funding for replacement of existing gas powered lawn and garden equipment. More information on the District CGYM program and funding can be found at: <https://ww2.valleyair.org/grants/clean-green-yard-machines-residential/> and <https://ww2.valleyair.org/grants/zero-emission-landscaping-equipment-voucher-program/>.

14)On-Site Solar Deployment

It is the policy of the State of California that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public health. The District suggests that the City consider incorporating solar power systems as an emission reduction strategy for future development projects that may be approved under implementation of the Tower District Specific Plan Update.

15) District's Bikeway Incentive Program

Bikeways installation projects can achieve reduction in VMT and they may be eligible for funding through the District's Bikeway Incentive Program.

The Bikeway Incentive Program provides funding for eligible Class 1 (Bicycle Path Construction), Class II (Bicycle Lane Striping), or Class III (Bicycle Route) projects. These incentives are designed to support the construction of new bikeway projects to promote clean air through the development of a widespread, interconnected network of bike paths, lanes, or routes and improving the general safety conditions for commuter bicyclists. Only municipalities, government agencies, or public educational institutions are eligible to apply. More information on the grant program can be found at:

<https://ww2.valleyair.org/grants/bike-paths/>

Guidelines and Project Eligibility for the grant program can be found at:

<https://ww2.valleyair.org/media/drpijuw1/bikeway-program-guidelines-62515.pdf>

16) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: <https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations>. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

16a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified

Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

Future development projects may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, project proponents shall obtain an ATC permit from the District for equipment/activities subject to District permitting requirements.

Recommended Mitigation Measure: For projects subject to permitting by the San Joaquin Valley Air Pollution Control District, demonstration of compliance with District Rule 2201 (obtain ATC permit from the District) shall be provided to the City before issuance of the first building permit.

For further information or assistance, project proponents may contact the District's SBA Office at (559) 230-5888.

16b) District Rule 9510 - Indirect Source Review (ISR)

Accordingly, future development projects within the Tower District Specific Plan Update may be subject to District Rule 9510 if upon full buildout, the project would equal or exceed any of the following applicability thresholds, depending on the type of development and public agency approval mechanism:

Table 1: ISR Applicability Thresholds

Development Type	Discretionary Approval Threshold	Ministerial Approval / Allowed Use / By Right Thresholds
Residential	50 dwelling units	250 dwelling units
Commercial	2,000 square feet	10,000 square feet
Light Industrial	25,000 square feet	125,000 square feet
Heavy Industrial	100,000 square feet	500,000 square feet
Medical Office	20,000 square feet	100,000 square feet
General Office	39,000 square feet	195,000 square feet
Educational Office	9,000 square feet	45,000 square feet
Government	10,00 square feet	50,000 square feet
Recreational	20,000 square feet	100,000 square feet
Other	9,000 square feet	45,000 square feet

District Rule 9510 also applies to any transportation or transit development projects where construction exhaust emissions equal or exceed two tons of NOx or two tons of PM.

The purpose of District Rule 9510 is to reduce the growth in both NO_x and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The Rule requires developers to mitigate their NO_x and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

In the case the individual development project is subject to District Rule 9510, per Section 5.0 of the rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency so that proper mitigation and clean air design under ISR can be incorporated into the public agency's analysis.

Information about how to comply with District Rule 9510 can be found online at: <https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview>

The AIA application form can be found online at: <https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/>

District staff is available to provide assistance with determining if future development projects will be subject to Rule 9510, and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

16c) District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants)

Future development projects will be subject to District Rule 4002 since the Project will include demolition, renovation, and removal of existing structures. To protect the public from uncontrolled emissions of asbestos, this rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Any asbestos present must be handled in accordance with established work practice standards and disposal requirements.

Information on how to comply with District Rule 4002 can be found online at: <https://ww2.valleyair.org/compliance/demolition-renovation/>.

16d) District Rule 4601 (Architectural Coatings)

Future development projects may be subject to District Rule 4601 if it may

utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: <https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf>

16e) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at: <https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx>

Information about District Regulation VIII can be found online at: <https://ww2.valleyair.org/dustcontrol>

16f) Other District Rules and Regulations

Future development projects may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

17)Future Projects / Land Use Agency Referral Documents

Future development projects may require an environmental review and air emissions mitigation. A project's referral documents and environmental review documents

provided to the District for review should include a project summary, the land use designation, project size, air emissions quantifications and impacts, and proximity to sensitive receptors and existing emission sources, and air emissions mitigation measures. For reference and guidance, more information can be found in the District's Guidance for Assessing and Mitigating Air Quality Impacts at: <https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf>

If you have any questions or require further information, please contact Michael Corder by e-mail at Michael.Corder@valleyair.org or by phone at (559) 230-5818.

Sincerely,

Mark Montelongo
Director of Policy and Government Affairs

A handwritten signature in black ink, appearing to read 'Daniel Martinez', with a stylized flourish at the end.

Daniel Martinez
Program Manager

LETTER 7
Fresno Metropolitan Flood Control District

File 310. "EE", "RR2", "UU2"
420.209

September 29, 2025

Ms. Sophia Pagoulatos, Planning Manager
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721

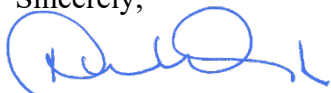
Dear Sophia,

**Fresno Metropolitan Flood Control District (FMFCD)
Comments on the Notice of Availability of an
Environmental Impact Report for the Tower District Specific Plan Update
Drainage Areas "EE", "RR2", "UU2"**

The Fresno Metropolitan Flood Control District (FMFCD) submitted comments regarding the Environmental Impact Report for the Tower District Specific Plan Update on June 9, 2025. These comments continue to be relevant and should be considered in the ongoing planning process. For your convenience and reference, a copy of the original letter is enclosed.

Thank you for the opportunity to comment. If you have any questions or require further information, please do not hesitate to contact me at (559) 456-3292.

Sincerely,



Denise Wade
Master Plan and Special Projects Manager

DW/lrl

Attachments

June 9, 2025

Ms. Sophia Pagoulatos, Planning Manager
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721

Dear Sophia,

**Fresno Metropolitan Flood Control District (FMFCD)
Comments on the Notice of Preparation of an
Environmental Impact Report for the Tower District Specific Plan Update
Drainage Areas “EE”, “RR2”, “UU2”**

The Fresno Metropolitan Flood Control District (FMFCD) has adopted storm drainage Master Plan systems for the areas located within the Tower District Specific Plan Update (Plan Area). These Master Plan systems are based on the previously adopted General and Specific Plan land uses.

For areas that have existing drainage facilities and propose changes to land uses that generate more runoff than originally planned, some type of mitigation to accommodate the increased flow such as parallel pipes and/or on-site retention may be required. FMFCD has identified properties within the Plan Area that may require some form of mitigation as noted on attached Figure 3.2 from the subject Tower District Specific Plan Update.

The properties may either make improvements to the existing pipeline system to provide additional capacity or may use some type of permanent peak reducing facility in order to eliminate adverse impacts on the existing system. Implementation of the mitigation measures may be deferred until the time of development. Should the properties choose to construct a permanent peak reducing facility, this system would be required to reduce runoff from a ten-year storm produced by the increased land use and release a two-year discharge which has been designed into FMFCD’s existing system. The developer will be required to submit improvement plans to the District for review and approval showing the proposed method of mitigation prior to implementation.

**Ms. Sophia Pagoulatos, Planning Manager
City of Fresno
Fresno Metropolitan Flood Control District (FMFCD)
Comments on the Notice of Preparation of an
Environmental Impact Report for the Tower District Specific Plan Update
Drainage Areas “EE”, “RR2”, “UU2”
June 9, 2025
Page 2**

Drainage fees shall be collected pursuant to the Drainage Fee Ordinance prior to approval of final maps and/or issuance of building permits at the rates in effect at the time of such approval. Instances when the proposed density is reduced and the District’s Master Plan facilities have been constructed will be subject to the higher rate anticipated to be collected when the facilities were installed. Should land use densities of existing areas be increased, the property would be subject to drainage fee commensurate to the higher density and paid to offset the effects of the increased land use. Please contact the District for a final fee obligation prior to issuance of any construction permits.

FMFCD offers the following comments specific to the review of the Plan Area (the individual page is included and the section or sentence has been highlighted for your reference):

1. Page 100, Local Streets and Alleys – In reference to “Green alleys”, FMFCD recommends that the City incorporate policies addressing drainage capacity and structural elevation in alleys, particularly where upstream runoff could threaten adjacent property back yards and/or building structures. Alley grading shall be designed such that there are not adverse impacts to the passage of major storm flow. Additionally, development of alleys shall include surface flowage easements or covenants for any portions of the developing area that cannot convey storm water to public right-of-way without crossing private property.

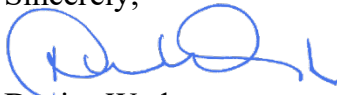
FMFCD does not recommend the use of permeable pavers and pavements as Low Impact Development (LID) strategies, as these conflict with FMFCD’s requirements for positive drainage to the street. LID features often necessitate ongoing monitoring and maintenance, and they may become ineffective over time due to clogging.

The City of Fresno, FMFCD, the County of Fresno, the City of Clovis, and the California State University, Fresno are currently covered as Co-Permittees for Municipal Separate Storm Sewer System (MS4) discharges through National Pollutant Discharge Elimination System (NPDES) General Order No. R5-2016-0040 and NPDES Permit No. CAS0085324 (Storm Water Permit) effective May 17, 2018. The previous Storm Water Permit adopted on May 31, 2013 required the adoption of Stormwater Quality Management Program (SWQMP) that describes the Storm Water Permit implementation actions and Co-Permittee responsibilities. That SWQMP was approved by the Central Valley Regional Water Quality Control Board on April 17, 2015 and is effective until adoption of a new SWQMP, which is anticipated within the next two years.

The Storm Water Permit requires that Co-Permittees update their CEQA process to incorporate procedures for considering potential stormwater quality impacts when preparing and reviewing CEQA documents. This requirement is found on Provision D.14 of the 2013 Storm Water Permit and in Section 7: Planning and Land Development Program – PLD 3 – Update CEQA Process. The District has created a guidance document that will meet this Storm Water Permit requirement entitled *Guidance for Addressing Stormwater Quality for CEQA Review*, which has been attached. In an effort to streamline future CEQA processing and maintain compliance with the Storm Water Permit, FMFCD recommends that all future CEQA review within the City of Fresno utilize the attached guidance document Exhibit “A”.

Thank you for the opportunity to comment. If you have any questions or require further information, please do not hesitate to contact me at (559) 456-3292.

Sincerely,



Denise Wade
Master Plan and Special Projects Manager

DW/lrl

Attachments

FIGURE 3.2 | Planned Land Use

Potential Areas for
Mitigation as
identified by FMFCD

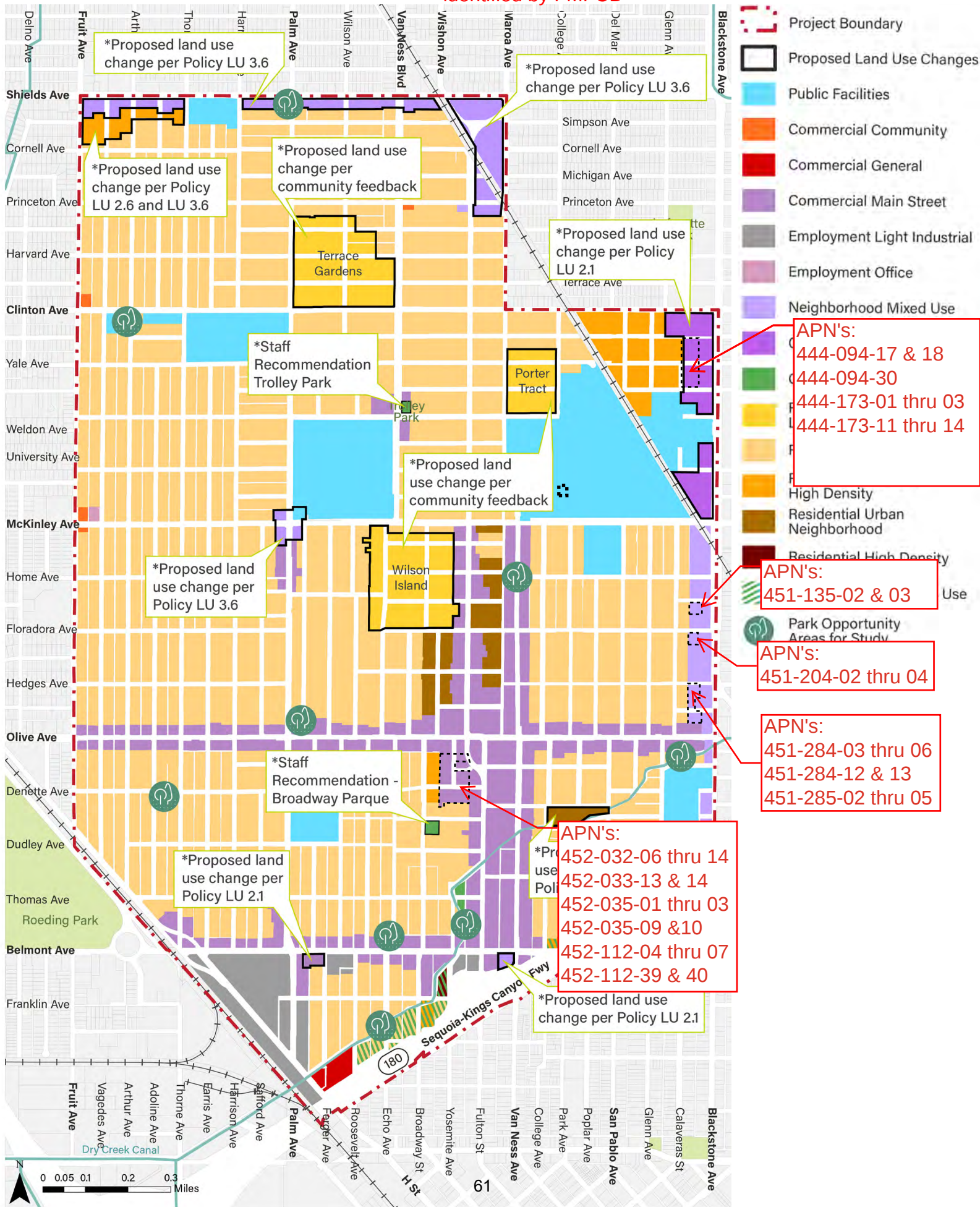


EXHIBIT "A"

Fresno Metropolitan Flood Control District

Guidance for Addressing Stormwater Quality for CEQA Review

Stormwater Checklist for CEQA Review

a. Potential impact of project construction on stormwater runoff.

Stormwater runoff from construction activities can have a significant impact on water quality. To build on sites with over one acre of disturbed land, property owners must obtain coverage under the California Construction General Permit for Discharges of Stormwater (CGP). The CGP is issued by the State Water Resources Control Board (SWRCB). The CGP requires sites that do not qualify for an erosivity waiver to create a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is a site-specific plan that is designed to control the discharge of pollutants from the construction site to local storm drains and waterways.

b. Potential impact of project post-construction activity on stormwater runoff.

FMFCD operates the Regional Stormwater Mitigation System, which consists of facilities to handle stormwater runoff and non-stormwater discharges in the FMFCD service area. However, river discharging drainage areas and drainage areas without basin service are subject to FMFCD Policy: Providing for Compliance with Post-Development and Industrial Storm Water Pollution Control Requirements (Policy).

Development and redevelopment projects can result in discharge of pollutants to receiving waters. Pollutants of concern for a project site depend on the following factors:

- Project location;
- Land use and activities that have occurred on the project site in the past;
- Land use and activities that are likely to occur in the future; and
- Receiving water impairments.

As land use activities and site design practices evolve, particularly with increased incorporation of stormwater quality BMPs, characteristic stormwater runoff concentrations and pollutants of concern from various land use types are also likely to change.

Typical Pollutants of Concern and Sources for Post-Development Areas

Pollutant	Potential Sources
Sediment (total suspended solids and turbidity), trash and debris (gross solids and floatables)	Streets, landscaped areas, driveways, roads, construction activities, atmospheric deposition, soil erosion (channels and slopes)

c. Potential for discharge of stormwater from areas from material storage, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas.

Development projects may create potential impacts to stormwater from non-stormwater discharge from areas with material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work area.

Some materials, such as those containing heavy metals or toxic compounds, are of more concern than other materials. Toxic and hazardous materials must be prevented from coming in contact with stormwater runoff. Non-toxic or non-hazardous materials, such as debris and sediment, can also have significant impacts on receiving waters. Contact between non-toxic or non-hazardous materials and stormwater runoff should be limited, and such materials prevented from being discharged with stormwater runoff. To help mitigate these potential impacts, BMPs should be included to prevent discharges from leaving the property.

Refer to FMFCD Post-Development Standards Technical Manual for more information or go to <http://water.epa.gov/polwaste/nps/urban.cfm>.

d. Potential for discharge of stormwater to impact the beneficial uses of the receiving waters or areas that provide water quality benefits.

Identify receiving waters and describe activities that may impact the beneficial uses of the receiving waters or that project water quality benefits. Project that can impact beneficial uses or receiving waters may be mitigated by implementation of the FMFCD Post-Development Standards Technical Manual.

e. Potential for the discharge of stormwater to cause significant harm on the biological integrity of the water ways and water bodies.

Conservation of natural areas, soils, and vegetation helps to retain numerous functions of pre-development hydrology, including rainfall interception, infiltration, and evapotranspiration. Each project site possesses unique topographic, hydrologic, and vegetative features, some of which are more suitable for development than others. Sensitive areas, such as streams and their buffers, floodplains, wetlands, steep slopes, and highly-permeable soils, should be protected and/or restored. Slopes can be a major source of sediment and should be properly protected and stabilized. Locating development in less sensitive areas of a project site and conserving naturally vegetated areas can minimize environmental impacts from stormwater runoff.

The evaluation of a project's effect on sensitive natural communities should encompass aquatic and wetland habitats. Consider "aquatic and wetland habitat" as examples of sensitive habitat.

f. Potential for significant changes in the flow velocity or volume of stormwater runoff that can cause environmental harm.

The evaluation of a project's effect on drainage patterns should refer to the FMFCD's Storm Drainage and Flood Control Master Plan and have their project reviewed by FMFCD to assess the significance of altering existing drainage patterns and to develop any mitigation measures in addition to our stormwater mitigation system. The evaluation should also consider any potential for streambed or bank erosion downstream from the project.

g. Potential for significant increases in erosion of the project site or surrounding areas.

The evaluation of a project's effect on drainage patterns should refer to the FMFCD's Storm Drainage and Flood Control Master Plan and have their project reviewed by FMFCD to assess the significance of altering existing drainage patterns and to develop any mitigation measures in addition to our stormwater mitigation system. The evaluation should also consider any potential for streambed or bank erosion downstream from the project.

LETTER 8
Producers Dairy Foods, Inc.



September 19, 2025

Via Email & U.S. Mail:

Sophia Pagoulatos, Planning Manager
CITY OF FRESNO
Planning & Development Department
2600 Fresno Street, Suite 3065, Third Floor
Fresno, CA 93721
longrangeplanning@fresno.gov
Sophia.Pagoulatos@fresno.gov

**Re: Tower District Specific Plan Update
Related Environmental Impact Report**

Dear Ms. Pagoulatos:

The Producers Dairy team is grateful for the hard work and commitment of City of Fresno (City) staff, the Tower Committee, and the public to bring this draft Tower District Specific Plan (Plan) to fruition. We remain committed to providing input on the Plan that allows us to continue operating our family business alongside and in cooperation with the City and neighbors. Producers has been a member of the Tower Community for over 70 years, and we feel privileged to offer job opportunities to people living in the area; Producers employs more than 500 individuals, out of which over 300 reside within a 10-mile radius of our establishment. Our employees have emphasized the importance of living near their workplace for a multitude of reasons including the ability to walk and bike to work, use less gas, and use public transportation.

With this in mind, Producers offers the following comments on the Plan and the related Environmental Impact Report (EIR) for the City's consideration¹:

- **Page 14 - Figure 1.4 Community Components**

Grammatical Recommendation: Figure 1.4 (page 14) shows "Proposed Historic Districts" in the legend, reflected on the map with light-yellow shading. Of particular interest to Producers and its neighboring businesses is the area south of Belmont and west of Broadway, which is shaded as a

¹ Producers also incorporates its August 9, 2024, Comments on the Draft Tower District Specific Plan, available at: <https://fresno.legistar.com/View.ashx?M=F&ID=13271207&GUID=2A21DD20-AF20-46E0-B006-59B6CB35EBF8>



proposed historic district. To remain consistent with the narrative of this draft plan, the legend should use the term **“historic designation study area”** rather than **“proposed historic district.”**

Labeling the area as “proposed” suggests the City has already taken a position to designate it as historic. This conflicts with the text on page 44, which instead states: *“Initiate a study for the historic designation of the following areas – pictured below.”* The map should therefore complement the text by identifying the area south of Belmont and west of Broadway as a **historic designation study area**, not as a proposed district.

CHP 1.5 Initiate a study for the historic designation of the following areas:

- **Area bounded by Olive and Van Ness, down to Elizabeth and San Pablo - east of Van Ness**
- **South of Belmont, West of Broadway**

Prioritize these areas for historic resource surveys and the evaluation of designated and potential resources, to provide for their potential designation as historic districts.

Furthermore, the EIR does not identify or acknowledge the area of South of Belmont, West of Broadway (page 3-16 and 3-17) as a planned/studied update or proposed historic district in the conservation and historic preservation section 3.6.1.

- **Page 38 - Figure 2.3 Historic Resources and Districts**

Additional Note: The same inconsistency appears on the map on page 38, where the legend again labels the purple cross hatched area as “Historic District – Proposed 2025.” As with Figure 1.4 on page 14, this should be revised to read **“Historic Designation Study Area”** to align with the narrative on page 44. Consistent terminology across all maps and text is essential to avoid confusion and to ensure this draft plan accurately reflects the City’s stated intent.

Also, as noted above, the EIR does not identify or acknowledge the area of South of Belmont, West of Broadway as a planned/studied update or proposed historic district in the conservation and historic preservation section 3.6.1.

- **Page 125 – Figure 5.6**

Producers continues to express concern to the City regarding the inclusion of bike lanes on H Street, as depicted in Figure 5.6 on page 125. H Street is a designated truck route, and our priority remains the safety of both our team members and the community.



- EIR at 1-11 – **Mitigation Measure AIR-1c**

Mitigation Measure AIR-1c should be clarified. The first sentence suggests the mitigation would apply only to businesses that seek to “locate”/construct within a certain distance from sensitive receptors. Does this provision only apply to businesses that seek to move into a new area, or would it apply to existing businesses that seek to modify or alter their operations to accommodate a changing business landscape? To provide transparency to the public, the EIR should state what the buffers would be. It is also unclear which categories of approvals or permits this mitigation measure would apply to.

- EIR at 1-29 – **NOI-1a & NOI-1b**

These mitigation measures appear to require a full construction noise analysis for any project that requires construction or grading and a full project-specific noise study for any “project.” Because the term “project” encompasses virtually any discretionary permit, virtually any permits for any business within the Plan Area would be required to perform a noise analysis, regardless of whether any such study is necessary. Establishing such a blanket requirement would not have a reasonable nexus to many of “projects” within the Plan Area and could have a chilling effect on modest projects proposed by small businesses.

Thank you for your consideration of these important comments.

Respectfully submitted,

Scott Shehadey
Owner and Chief Executive Officer
Producers Dairy

LETTER 9
Business Owners
(La Tapitia, Patton, and Producers)



September 29, 2025

City of Fresno
Planning and Development Department

Attn: Long Range Planning and Sophia Pagoulatos

Re: Draft Tower District Specific Plan and Environmental Impact Report

On behalf of several businesses operating in and around the Tower District, we want to thank the City of Fresno, the Tower Committee, and community stakeholders for the time and commitment invested in developing the Draft Tower District Specific Plan (Plan) and Environmental Impact Report (EIR). The business community values this collaborative effort and shares in the goal of balancing neighborhood priorities with a strong, sustainable economic base.

As businesses rooted in this area, we are invested in both the success of our community and the ability to continue operating effectively. With this perspective, we respectfully submit the following comments for the City's consideration:

- **Plan Mapping – Figures 1.4 (p. 14) & 2.3 (p. 38):** Both maps label certain areas, including south of Belmont and west of Broadway, as “Proposed Historic Districts.” This terminology conflicts with the Plan narrative (p. 44), which calls for initiating a study of potential historic designation. To avoid confusion, the maps should be revised to reflect these areas as **“Historic Designation Study Areas.”** Consistency between the maps and narrative is essential.
- **EIR – Mitigation Measure AIR-1c (p. 1-11):** This mitigation measure should be clarified to ensure it will not apply to new permitting for existing businesses, all of whom have made significant investments in the Tower District, and who could be prevented from upgrading or modernizing as a result of the restrictions contemplated under this measure.
- **EIR – Noise Mitigation Measures NOI-1a & NOI-1b (p. 1-29):** As written, the requirement for project-specific noise studies appears to apply broadly to nearly any discretionary permit, regardless of scale or impact. This blanket approach risks creating unnecessary costs and barriers, especially for modest projects pursued by small businesses. A more tailored requirement would ensure a reasonable nexus between project type and environmental review.

We submit these comments not in opposition to the Plan, but to ensure it achieves its intended balance: protecting community character while providing a clear, predictable framework that supports local businesses. We believe this approach will allow both businesses and residents to thrive together in the Tower District.

Thank you for considering these perspectives. We look forward to continuing dialogue with the City as the Plan advances.

LETTER 10
Diana Diehl

From: [Diana](#)
To: [LongRangePlanning](#)
Subject: Tower District Specific Plan Update public comment
Date: Monday, September 29, 2025 12:17:30 PM

External Email: Use caution with links and attachments

Longrangeplanning@fresno.gov

Thank you for this opportunity to provide public comment on this important issue.

While I very much appreciate the hard work involved in creating this document, the TDSP Update does not do enough to protect residents from the heavily negative effects of the nightlife, deferring mostly to a future "entertainment district overlay."

Thanks to a long series of the City's choices, currently Tower's primary industry is drinking, and our secondary industry seems to be targeting the drinkers and their cars for crimes, which very much negatively impacts the health and equity of most residents regardless of their specific location.

"This Specific Plan Update prioritizes health and equity" but redlining is still very much evident in the Update, as special designation is given to the areas formerly holding racial covenants while the third grade "C" and fourth grade "D" south of Olive continue the ongoing disinvestment, south Tower not meriting any of the bespoke vintage-style Tower street signage below Olive AND even having our residential Dunbar Tracts at Dennett and Yosemite rezoned from residential to Commercial Main Street in this Plan.

Quite a slap in the face from a document that speaks about the long history of inequitable treatment in this very area. Somehow even the existing protections of the 1991 TDSP didn't save our historic Taylor and Wheeler homes from the City's industrialization. "Equity"? Someone's home is usually their largest asset, and the City just arbitrarily devalued over 20 residences for nonexistent business.

Expanding commercialization into residential areas while housing is desperately needed AND there's a real issue with Tower vacancy rates seems doubly wrong headed.

Will this Plan protect all residents? Will everyone's "character-defining streetscape elements" be protected or only in certain areas, again? The 1991 TDSP mentions how valued are our street trees, yet not one of the 8 we've lost on Dennett since have ever been replaced.

So much of Tower has already been lost to inappropriate development, and sadly these neighborhoods continue to suffer because through no fault of their own but through decades of the City pandering to developers, these areas are no longer "intact" enough to be considered "historic" and worthy of these special designations and protections, and so the decline continues while the formerly racially-covenanted properties continue to receive disparate benefits and special designations.

I am also concerned that more high density and mid density housing is planned, because

Tower already has had more than her fair share. Our street was built out with mostly SFRs, and of the 13 houses, only 6 remain. The other 7 were cut into apartments or replaced with apartments after a damaging fire. The ENTIRE City of Fresno needs to get aboard the density train, not just distressed areas of Tower. Stop telling us we're "lucky to get anything new" and then building a high-density tightly-packed eyesore.

The updated Plan mentions "nurturing the mutually supportive relationship between residential and vibrant commercial areas." Page 22 has a photo of a community meeting showing a large "be a good neighbor" sign and I'm wondering where does the Plan address the good-neighborship of the "vibrant commercial areas"? Because "equity"? residents already compromise a lot. A LOT.

18-wheelers travel our residential streets daily delivering liquor and consumables to Olive, there are numerous commercial dumpsters along Olive that require daily services accessed from side streets, the City blows the Tower parking lot at 6 a.m. to dislodge the sleeping unhoused, residents listen to Scrubcan and City trucks as public trash cans are serviced at 4 a.m., and our Olive sidewalks are covered with food and liquor garbage, urine and vomit that never seems to get washed away unless there's a City pressure-washing project.

It's noisy here, 24 hours a day. Tower residents recognize that the "vibrant commercial areas" need services to operate. But WHERE are the "vibrant commercial areas" compromising for the residents? The City doesn't even enforce the mandate to secure commercial trash, which is certainly part of the reason Tower streets are so trashy. Meanwhile, local Tower businessman publicly announces that he's not obliged to clean up outside his Wishon bar, because his "excessive City taxes" should cover those services.

Noise. Noise, noise, noise. The updated Plan mentions the ill health effects of ongoing excessive noise. The updated Plan mentions "noise mitigation" in the context of the vibrant commercial areas negatively affecting adjacent residents, but fails to note that the RESIDENTS should never be the sole notice/enforcement process.

How Tower noise complaints currently work: residents are awakened by window-rattling music at 1 a.m., and call the non-emergency police number where after waiting on hold for 10+ minutes, they are told that a specific address is required before the PD can accept any complaint.

Resident gets dressed and walks to Olive and must determine if the window rattling is caused by the excessively loud music coming from Veni's open door, if the excessively loud music is coming from the mobile vendor food trailer blocking parking spaces at International Furniture or the mobile vendor food trailer blocking parking spaces at Detention, or if the excessively loud music is coming from Vibez or Splash patios, or if the excessively loud music is coming from the hot dog cart in the Wishon/Olive parking lot, or if the excessively loud music is coming from the mobile DJ's speakers plugged in at the City-owned Tower Theater, or if the excessively loud music is coming from the unlicensed 24 hour business next door, or if the excessively loud music is just coming from some random parked tailgating party car. The resident will almost certainly walk past more than one police vehicle in this process.

Once the specific address is secured, the resident calls back the non-emergency police number and waits on hold for another 10 minutes. The resident provides the specific address and makes their complaint and is told that this isn't the first complaint but police calls are very

busy right now but maybe later they can send someone to the area. Having just walked past 3 or 4 parked patrol cars, this is disheartening to hear. The morning of the next day, the resident calls the non-emergency police number to follow up, and is told that there's no record of any noise complaint from last night.

This "process" is insulting to residents and BEYOND ridiculous and the City should be monitoring these fully foreseeable ongoing noise issues as part of their code enforcement. Not relying upon specific complaints that the City then ignores and conveniently doesn't even track.

When the City changes the character of a neighborhood by promoting nightlife and an "entertainment district" and licenses and inspects businesses adjacent to residential, the City should be aggressive and diligent in discovery of new or non-conforming business entities to ensure that they are appropriate and a good fit for a family neighborhood, and not over-represented - too many smoke shops, e.g.

The City sends the police to Tower to set up enforcement traps and DUI checkpoints, and parks patrol cars at Detention or Roger Rocka's to monitor the crowd drinking on the street. But issues for Tower residents go unaddressed - neighbors report break-ins, broken windows, even hot prowl burglaries, and the police never respond. The City process seems to only serve business needs.

The Plan Update discourages front yard fences as "unwelcoming" and specifically mentions how these older residences have street-facing entrances and street-facing windows, and yet these are the very same streets where the City invites hundreds of rowdy people every night to park in our residential neighborhoods where they drink in their cars, urinate in our driveways, and noisily party in the street until 3 a.m. instead of spending their money at the businesses on Olive. Where is the "human focused design" in that?

Looking forward to the updated Plan's "enhanced livability" because imposing an expanding nightlife on residents is the opposite of that. Also looking forward to the "sustainability" cited by the Update because approving increasing numbers of drinking places in a small residential neighborhood is NOT a sustainable business model when more and more entities are fighting for the same dwindling number of entertainment dollars.

Little two-lane Olive now has the additional traffic from the closed Hwy 99 exits at Belmont and McKinley, plus the HSR construction. This is an unprecedented amount of industrial and commuter traffic dumped into our historic residential neighborhood via an extremely narrow road. The Plan Update does not address mitigating the impact of this. We already suffer excess traffic short-cuts from drivers frustrated by the lane changes, protected bike lanes, mobile vendor food trailers, and the parklets, on top of the nightly tourist cars and those who come to prey upon the visitors. This traffic will affect air quality, noise, and our quality of life.

Looking forward to "calming auto oriented roadways" because our previous efforts to bring this issue to the City's attention have been met with an unusual amount of great difficulty, resistance, and excuses.

The Plan Update is fairly silent about our parking issues. Our driveways and the fire hydrant are blocked or obstructed daily by parking tourists, and despite our "walkability" and notable

pedestrian traffic, not even the crosswalk Daylighting laws are enforced in Tower. There are regular stop sign traps, but only on weekend nights. So much for Safe Routes To School.

Much of the City-owned Tower Theater parking lot is often blocked off to the public for paid reserved parking. It is not fair for the City to permit the residential streets to be used for pre- and post-game tailgating from 10pm until 3am. The City should study the parking issue and provide tourists with signage and maps instead of inflicting these issues on residents.

A residential parking permit district sounds awesome, or even metered parking for evenings and events. Our street is already crowded with parked cars: a 19-unit Airbnb with zero offstreet parking, a 400-person event venue with a shared 20-space parking lot, an 8-unit apartment complex with 24 bedrooms and only 10 parking spaces.

On weekends between the hours of 10 p.m. and 3 a.m., our street often looks like the Walmart parking lot on Christmas Eve - lines of cars jockeying for parking, drivers honking and shouting, loud stereos and car alarms. Meanwhile, there's not ONE car parked on Wishon or Fulton or at the Golden, Veni, or Babylon parking lots despite being so much closer to the nightlife. Why are so many seeking privacy for parking AND what is the impact of that decision on residents?

How about installing (optional) "residential quiet zones" so that the families in these family neighborhoods can sleep at night?

Utilities should be underground or concealed as much as possible in some sort of period-appropriate or decorative box especially when installed on private property or on residential streets, and City staff should be working to identify these eyesores and attractive nuisances and have them removed or improved because keeping Comcast property graffiti-free is a full time job in Tower.

LU 5.4 "future street vending programs" is concerning; it is not at all equitable to divert commuter traffic from Olive to Dennett (the "Safe Route To School") for a weekly food truck event program that DIRECTLY COMPETES with our local businesses. Any street vending programs should be sensitive to and not competitive with existing local businesses, and any road closures should be sensitive to school routes and the needs of and the impact upon existing local residents.

Short-term rentals affect Tower neighborhoods, especially vis-a-vis drinking and driving and the impact on visitor street parking. The impact of Airbnbs etc should be addressed as part of the updated Plan.

It was difficult to read the updated Plan, knowing all too well how readily the first Plan has been disregarded all these years. Many of the issues listed have been previously raised with the City repeatedly since 1991 only to go absolutely nowhere or be rudely blown off. Hoping that this Plan isn't also just pretty words to be ignored every time it's financially or politically expedient.

I love this neighborhood. I've loved it since 1981. I loved it so much I bought two properties here and planned to stay forever. But I've noticed that no matter how much the City talks about mixed-use compromise and "mutual benefit," it's the residents who are expected to bend for convenience every time, and the Updated Plan seems like more of the same.

More protections for residents, please. The houses will still be here long after the businesses go broke.

Thank you.

Diana Diehl
Dennett Avenue
fresNo, 93728

.

LETTER 11
Neva Popenoe

From: [Neva Popenoe](#)
To: [LongRangePlanning](#)
Subject: Tower District Specific Plan Update
Date: Monday, September 29, 2025 9:50:47 PM

External Email: Use caution with links and attachments

Hello,

I would like to offer a few comments regarding the proposed Tower District Specific Plan Update. Below are a few items that I don't believe were sufficiently addressed and some suggested edits:

1. Adjust industrial zones to exclude housing units. Industrial zones include several residential properties and they should not be included in the industrial zoning.
2. Provide more park areas with green space. The plan lists schools and Ted C Wills as public areas and parks, but they have limited hours, and often do not allow families to have access to green space on weekends. Provide open space areas throughout the District, and don't include areas that are limited in access and space.
3. Restrict truck traffic through areas with residential properties. While many areas may be designated travel corridors, these are areas where people live, and should not be subject to air pollution because they have more affordable housing in these pockets. The people living along the corridors or in or adjacent to industrial zones do not deserve to have higher levels of pollution.
4. Require air monitoring throughout the district, particularly in industrial areas and travel corridors. Air quality monitors should be available for public viewing.
5. Do not limit density in any area. Infill should not be restricted in historical areas. Houses throughout the Tower district are more than 100 years old, and there is no reason one block should have special treatment because its historic connection as a better graded property zone. There is something troubling about continuing such a designation.
6. Provide better and more shelters at bus stops. In the hottest time of the year, I've seen people look like they were about to pass out waiting for the bus at the northeast corner of Olive and Van Ness and this is a designated sheltered bus stop. There is no shade at the seats during certain times of the day, and should not be considered a sheltered bus stop, as there is no shade near the bus stop. The bus stops along Olive and Fulton are some of the busiest and they have very few sheltered stops, and as stated, the shelters are grossly inadequate.

Thank you,
Neva Popenoe

LETTER 12
Chris Johnson



CITY OF FRESNO
PUBLIC REVIEW DRAFT
TOWER DISTRICT DESIGN
STANDARDS & GUIDELINES

AUGUST 2025



E Simpson AVE
600

Overall Comment for the entire document: We need more photos, graphics and examples in the 'white' empty areas. I think the ones we have are great and very helpful. More will make this so much easier to use and more representative of the Tower District!

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01

INTRODUCTION

INTRODUCTION

The Tower District is a special place within the City of Fresno, with a long history and distinctive architecture and urban form. While much of Fresno was designed around the automobile, the neighborhoods of the Tower District were originally designed around public transit and pedestrians, which makes them unique compared to areas that were built later with the automobile as their central focus. But while the Tower District is unique, it is not a museum exhibit preserved in amber, nor should it be. It is a dynamic, living neighborhood where new growth and development are welcome. Indeed, the Tower District stands to benefit from the creation of new homes, businesses, and amenities. However, since architecture and urban form of the Tower District are so distinct from other parts of Fresno, design guidance is needed to help maintain its unique character. Growth and evolution are welcomed, but change cannot come at the loss of the Tower District's distinctive walkable, human-scaled, and occasionally-quirky character.

These Design Standards and Guidelines build upon historic development patterns, the Citywide Development Code (Development Code), the original Design Guidelines, and the updated Specific Plan, in order to guide development projects to make positive contributions to the Tower District's uniqueness, beauty, and walkability. This document is intended to preserve the essence of the Tower District while facilitating compatible infill development. This introductory section provides an explanation of how and why this document was created, how it is organized, and how it is implemented in conjunction with the Development Code to regulate land use and development within the Tower District Specific Plan Area. The following



Home in the Porter Tract Historic District with porte cochère and front porch

[More Photos and Examples](#)

three sections will then provide regulations for different types of properties within the Tower District, based on their zoning designations. A separate section on Architectural Style was added in this update to apply more broadly to the property types subject to these Standards and Guidelines.

A. History of the Tower District

The Tower District began to develop in the early part of the 20th century as one of Fresno's first suburbs. George and Rosanna Wilson purchased 400 acres of vineyards in what would become the center of the Tower District around 1890. They established their home there (at the eventual location of the Chicken Pie Shop on Olive Avenue just east of the Tower Theater) and began making plans to build housing to accommodate Fresno's booming population growth. While they initially struggled to attract development to their estate, this dream became possible when the first streetcar line reached the area via Forthcamp Avenue (later renamed Fulton Street) in 1909. The Wilsons named the main north-south road through the burgeoning neighborhood Wishon, to entice local business magnate A.G. Wishon to build his home on Block 5 of their new subdivision – now the site of the Tower Theater. This was intended to give prestige to the area. Wishon initially agreed to do so but eventually built his home on Huntington Boulevard instead. George was successful, however, in convincing him to extend his streetcar lines further into their land holdings, which would end up being far more valuable to the area's development.

In 1915, George Wilson died and Rosanna, who actually owned the land and was the driving force behind the development of the neighborhood, took full control of the project. Development

More Photos and Examples

activity accelerated rapidly, and other developers began to develop their land in the area as well. While the initial construction projects were single-family homes, by the 1920s, apartment houses began appearing, and commercial clusters developed in several areas, such as Weldon and Echo Avenues near Fresno High School, Van Ness Village at Van Ness and Floradora Avenues, Fulton Street south of Olive Avenue, and most significantly, along Olive Avenue. In 1939, the Tower Theater opened; it was the first theater outside of Downtown and it generated much excitement. By the early 1940s, home listings in the area began boasting of their location in the Tower Theater District, permanently linking the neighborhood's identity to its new landmark. Rosanna Cooper Wilson lived until 1947 and was able to see her dreams of creating a thriving neighborhood come to fruition.

During the decades after World War II, conventions in development and neighborhood design changed dramatically. Emphasis shifted from the streetcar and the pedestrian to the automobile. While the area was fully developed by the time this shift took place, suburban-style development occurred in the Tower District area that damaged its original character. The City of Fresno also engaged in a road widening campaign, turning narrow local serving residential streets such as Shields, Clinton, McKinley, and Palm Avenues, into wide suburban-style arterial roads, which left homes that formerly had spacious front yards just feet from fast-moving traffic. But while the Tower District suffered some poor development and neglect of older structures, its urban fabric remained mostly intact as compared to other inner-city neighborhoods in Fresno.



Tower District's combination of walkable streets and diversity has contributed to its reputation as a highly livable place.

In the late 1980s, Tower District residents became increasingly active in protecting the future of their neighborhood. This began when community members grieved the demolition of a historic building and opposed an incompatible building in the area, which led to the development of the 1991 Tower District Specific Plan. One of the outcomes of the 1991 Plan was the creation of a Design Review Committee and Implementation Committee, which have operated since the original Plan was adopted. The strong activism among neighborhood residents continues to this day.

In the 1990s, America experienced an urban renaissance. Downtowns in many cities gained population for the first time since the 1940s and people began to value traditional architecture and walkable neighborhood design again. The New Urbanism movement, which advocated a return to traditional town planning, swept the city planning profession. Older, formerly disinvested neighborhoods became popular again as many people sought walkability, historic architecture, locally owned businesses, and arts and culture. The Tower District was well-positioned to ride this national trend by providing an alternative to the strip malls and chain stores of other areas. It had already taken the mantle of Fresno's center of arts and culture thanks to the launch of the Wild Blue nightclub in 1974, Roger Rocka's Music Hall in 1978, the Tower Theater's restoration and new focus on the performing arts in 1988, and Butterfield's Brewing in 1989. Shops and restaurants in the area began to thrive, and homes and apartment houses began to receive facelifts. The area began to host citywide special events and blossomed into an important cultural center of Fresno's larger metropolitan area.

More Photos and Examples

While the 1991 Tower District Specific Plan provided a strong policy framework for positive development in the Tower District, the old suburban-oriented zoning of the 1960s remained in effect and the area was still vulnerable to incompatible automobile-oriented projects. Driven by these concerns, local residents worked with the City of Fresno to create the Tower District Design Guidelines, which were adopted as an amendment to the original Specific Plan in 2005 to clarify and strengthen the community's vision for appropriate development. In 2015, the City of Fresno repealed the old 1960s zoning ordinance and adopted the Development Code in its place. This new set of land use regulations was a major departure from the old code and aligned much more closely with the Specific Plan and Design Guidelines by placing a greater emphasis on walkability and by allowing mixed-use development without a lengthy project approval process.

These Design Standards and Guidelines are based upon on the original Design Guidelines and the updated Tower District Specific Plan. The updated Plan incorporates lessons learned since the 1991 Plan and ever-emerging best practices. It encourages the continued revitalization of the Tower District and preservation of its unique sense of place. The updated Plan emphasizes replacing vacant and aging strip commercial properties with infill development that enhances the Tower District's pedestrian-friendly character, while adding vitality and new housing.

[More Photos and Examples](#)

B. The Vision for the Tower District

The vision for the future of the Tower District has three essential elements.

First, the historic character of the neighborhood must be retained. Until adoption of the Tower District Specific Plan in 1991, pressures to remove historic structures, widen roads, and convert the area into something that resembles a contemporary suburb had existed. This is not the vision of the Tower District residents.

Second, the residents of the Tower District envision it growing and evolving into an area that has more vitality, more street life, more goods and services, more comfortable public spaces, and more beautiful architecture. The Tower District has always been—and should continue to be—a little different from the rest of Fresno.

Finally, the Tower District should remain walkable and where that walkability has been eroded, it should be restored and enhanced to the greatest extent possible.

The origin of this vision is articulated in the principles embodied within the Tower District Specific Plan, both the 1991 Plan and newer version:

- Conserve and enhance existing residential neighborhoods.
- Respect and further enhance the historic character of the Tower District as a place not dominated by the automobile.
- Conserve and revitalize the Tower District's historic and architectural resources.



Renovated Façade on Palm Avenue Bungalow.



Early 20th-century apartment building with covered entry and varied massing

- Require that new housing respect the character of existing housing stock.
- Promote mixed-use development along commercial corridors.
- Enable development of well-designed “missing middle” housing.
- Streamline residential project review through the adoption of objective development standards.
- Encourage appropriate mixed-use and multi-family development by reducing obstacles to feasibility of potential development projects.
- Emphasize placemaking in Tower District.

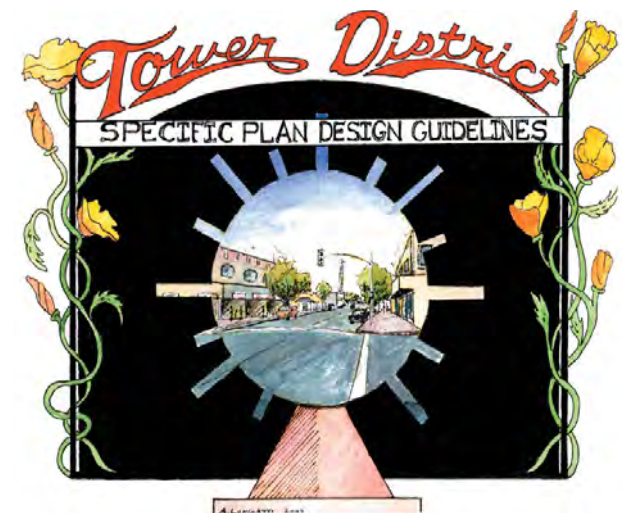
C. Purposes of These Design Standards and Guidelines

These Design Standards and Guidelines implement the updated Tower District Specific Plan and are based in large part on the original Tower District Design Guidelines that were adopted in 2005. The purpose of the original 2005 Design Guidelines still remain relevant and are as follows:

- To assist property owners and developers by clearly describing what is expected of projects in the Tower District Specific Plan Area, thus minimizing delay and uncertainty.
- To assist City and community review authorities by guiding development to ensure that new projects enhance the established character of the area and increase their viability.
- To assist the City and community review authorities by making it clear to developers and property owners what is expected of them from new development and the remodeling of existing buildings.

Can we add something about smaller, entry level ownership housing through the use of ‘condos’ type and removing the barriers that prevents that from happening in CA.

More Photos and Examples



The Tower District's 2005 Design Guidelines played a vital role in guiding development and established a foundation for this document.

- To maintain the integrity and further the implementation of the goals, objectives, and policies of the Tower District Specific Plan.

These Design Standards and Guidelines also address needs, considerations, and practices which have emerged since adoption of the 2005 Design Guidelines, including:

- Incorporate best practices for urban design and architecture that have emerged as practices have been applied and tested, and as innovation has occurred.
- Account for the State of California legislation that limits local government discretion in the review and approval of housing projects by emphasizing clarity, fairness, and timeliness. Specifically, anticipate applications for qualifying housing projects, for which State law limits review to established "objective standards" that "involve no personal or subjective judgement ... and are uniformly verifiable by reference to an external and uniform benchmark ...".
- Support implementation of the City's Housing Element and housing production by avoiding development standards that could make the maximum allowable density (as stated in the Development Code) physically or financially infeasible.
- Emphasize development compatibility with Tower District's unique sense of place through the use of objective standards for essential design attributes and continued use of design guidelines where flexibility in interpretation is needed.



Context-sensitive contemporary development in Tower District

I think this is a good example for Blackstone but not sure we would want this in the core of the tower? The retail is single story.

More Photos and Examples

D. Applicability

Development projects proposed in the Tower District Specific Plan Area will be subject to regulations within the Development Code and this document. The Plan Area is shown in Figure 1. The standards and guidelines within this document apply to Tower District zoning district designations identified in Table 1. Properties in Employment Districts are not subject to these Guidelines but subject to review by the Tower District Design Review Committee. The zoning designation of a property can be identified at www.fresno.gov/zoningmap

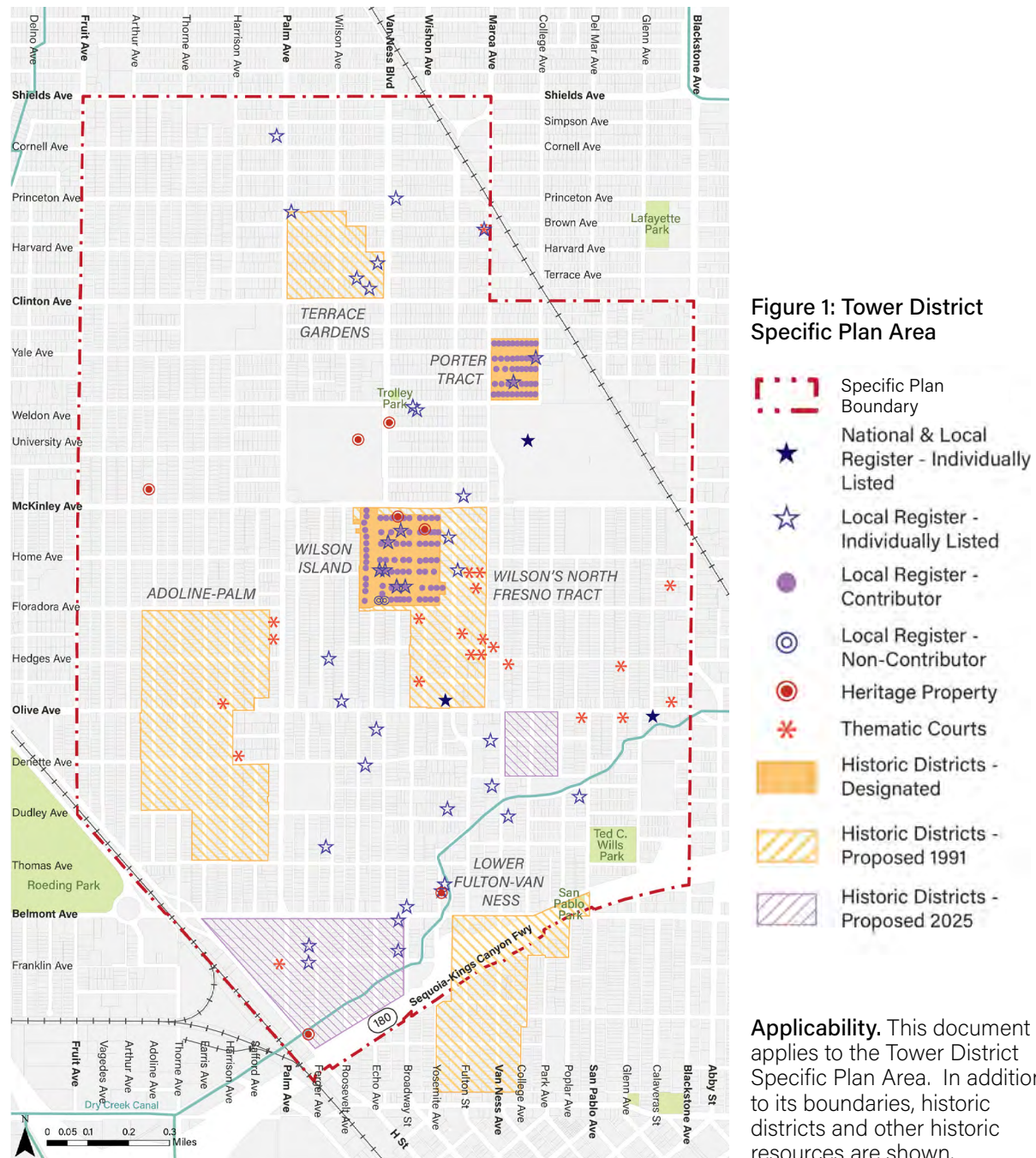
Projects shall conform to the requirements of the underlying zoning district, all applicable overlay districts, and all other Articles within the Development Code. In the event of a conflict between regulations in the Development Code and regulations on the same subject in this document, this document shall prevail per Priority of Plans in Section 15-104-B-4-a of the Development Code. The following map also shows designated and potential historic resources in the Tower District, which are subject to procedures described in the next section.

[More Photos and Examples](#)

Table 1: Tower District Zoning Designations

ZONING DESIGNATION	APPLICABLE CHAPTERS
Residential Single-Family Districts (RS-1, RS-2, RS-3, RS-4, or RS-5)	Chapter II. Residential Single-Family Districts
Residential Multi-Family Districts (RM-1, RM-2, RM-3, or RM-MH)	Chapter III. Residential Multi-Family Districts
Mixed-Use Districts (NMX, CMX, or RMX)	Chapter IV. Mixed-Use and Commercial Districts
Commercial Districts (CMS, CC, CR, CG, CH, or CRC)	Chapter IV. Mixed-Use and Commercial Districts
All Other Zoning Districts in Tower District Area	Not Applicable

Subareas within the Tower District are also regulated by the Apartment House Overlay District (AH) zoning designation, which allows multi-family development without ground-floor commercial where it would otherwise be required, along with other AH requirements. Furthermore, standards and guidelines that pertain to architectural styles apply to all of these zoning designations. Most of these provisions are described in Chapter V. Architectural Styles.



E. How to Use This Document

1. RELATIONSHIP TO THE DEVELOPMENT CODE

The Development Code (Chapter 15 - Citywide Development Code, of Fresno's Municipal Code) is the central repository of land use and development regulations for the City of Fresno. The Development Code should be consulted first when considering development project applications for any property within the City of Fresno, including the Tower District. The Tower District Design Standards and Guidelines document should be seen as a supplement to the Development Code, which builds on the Code's framework while carrying forth a more detailed vision for development in Tower District.

This document is organized to match the structure of and terminology in the Development Code, as much as possible, to facilitate easy application of both documents to a particular project proposal. When a particular subject is not addressed in this document, the Development Code's regulations shall apply. At the same time, if standards in other parts of the Development Code are inconsistent with this document, then standards in this document shall apply.

2. STANDARDS VS. GUIDELINES

Development regulations established in this document are divided into two types, standards and guidelines.

Standards address those aspects of development that are essential to achieve the purpose of these Design Standards and Guidelines as described above, which include implementation of the goals, objectives, and policies of the Tower District Specific



Wolfe Home (1919) in the Porter Tract Historic District with deep eaves and vertically-proportioned window frames

[More Photos and Examples](#)

Plan. Conformance with Standards is mandatory. Standards are indicated with the heading "STANDARDS" and the verb "shall" to indicate definitive expectations.

Guidelines provide guidance for new development and are often related to district character or design details. They are intended to direct building and site design in a way that results in the continuity of the unique character of the Tower District. Guidelines are written in subjective language which may require discretion to apply to a proposed project. Whereas conformance with the Standards is mandatory, conformance with the Guidelines is preferred and strongly recommended but will not be mandatory when project review is limited to objective standards. Standards also distinguish objective benchmarks free from interpretation, as is required in streamlined review of qualifying housing projects by the State of California, free from discretionary decisions, from guidelines that remain strongly encouraged but are not obligatory under State streamlining laws.

Although direct conformance with the Guidelines is the surest route to context-sensitive design and timely approval, developers are permitted to propose alternative design details, if they are able to show that such details implement the objectives of the Tower District Specific Plan. Guidelines are indicated with the heading "GUIDELINES" and the verb "should" to indicate that the guidelines are not absolute.

[More Photos and Examples](#)

3. HISTORIC RESOURCES

Properties designated as historical resources on the local, state or national registers fall under the purview of the City's Historic Preservation Commission and are protected under local, state, and sometimes federal environmental laws. Therefore, they would not be subject to these Standards and Guidelines.



02

RESIDENTIAL SINGLE- FAMILY DISTRICTS



RESIDENTIAL SINGLE-FAMILY DISTRICTS

A. Purpose

The Residential Single-Family standards and guidelines are intended to preserve the unique character of areas with RS zoning designations while facilitating compatible infill development. RS districts are the most common zoning designations in the Tower District, and they are predominantly developed with single-family residences, however, these areas also harmoniously accommodate small multi-family housing types such as bungalow courts, and small multi-plexes with up to four dwellings. Residential Single-Family standards also apply to accessory dwelling units (ADU) that are detached from other buildings.

Although the numbering of the Standards and Guidelines that follow may appear nonsequential it is sequential across the document and optimal for implementation.

B. Uses

STANDARDS

S1. Uses shall be permitted, conditionally permitted, or prohibited as set forth in Development Code Section 15-902, Use Regulations, and applicable Overlay District regulations.

GUIDELINES

G1. Development should contribute to a neighborhood that promotes walking, is human in scale, and offers opportunities for “missing middle” and other forms of housing.



Single-Family Homes. Typical Tower District single-family residences. Tudor style (above) and Neo-Classical style (below)

C. Density and Massing

1. LOT SIZE

STANDARDS

S6. Lot size shall be as required by Development Code Section 15-903, Density and Massing Development Standards, and applicable Overlay District regulations including Development Code Section 15-1609, Affordable Housing Overlay District.

GUIDELINES

G6. Lots should generally be small to reinforce the walkable nature of the Tower District and should not exceed 0.5 acres in size.

G7. Lot width should be less than lot depth.

G8. Lots should not extend the entire depth of the block, fronting on two streets. Rather, lots should extend to mid-block.

G9. Encourage parking configurations that reduce the site area dedicated to parking, such as with tandem parking.

2. BUILDING HEIGHT AND MASS

STANDARDS

S8. Building height and mass shall be as required by Development Code Section 15-903, Density and Massing Development Standards, and applicable Overlay District regulations.

GUIDELINES

G11. New buildings should have massing near street-facing setback lines that is similar to neighboring buildings along the same block face.



Single-Family Homes. Typical Tower District single-family residences with Modern styles.

3. SETBACKS

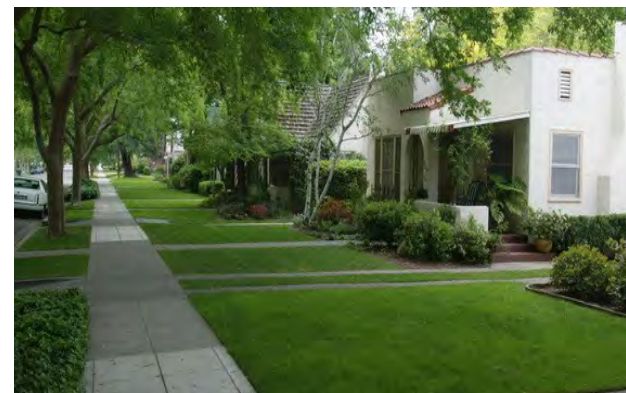
STANDARDS

S13. Setbacks shall be as required by Development Code Section 15-903, Density and Massing Development Standards, and any applicable Overlay District regulations, except as follows:

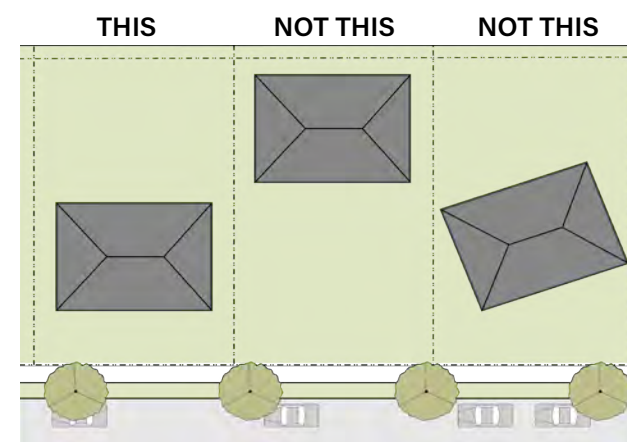
- a. Front Setback. The front setback for new structures shall not be greater than 110 percent nor less than 90 percent of the average of the actual front setbacks of all residential structures on the blockface which were constructed prior to 1945. The following exceptions shall apply:
 - i. In no instance shall the front setback be less than 10 feet; and
 - ii. In no instance shall the setback for a new structure be less than the setback of an adjacent structure which is a designated historic resource.

Diagram for this?

- b. Side Setbacks for Primary Structures. Side setbacks shall be as required by the base and overlay districts, except that lots which have a width of less than 45 feet shall have a minimum required side setback of 0 feet if the other side is set back 12 feet or more to accommodate a driveway which provides access to a detached garage which is located in the rear of the lot, and no alley is available.
- c. Side and Rear Setbacks for Detached Garages. Where 50 percent or more of the residential properties on a block have detached garages which encroach into the minimum side and/or rear setbacks, side and rear setbacks for new detached garages shall be as follows:



Uniform Setbacks. This Tower District street with uniform front yard setbacks creates a very pleasant place to live. This patterns should be maintained.



Front Setbacks and Building Orientation. Homes should be located toward the front of parcels and street-facing facades should run parallel with the street.

- i. 0 feet minimum side setback; and
 - ii. 0 feet minimum rear setback.
 - d. Side and Rear Setbacks for Detached Garages. Where less than 50 percent of the residential properties on a block have detached garages which encroach into the minimum side and/or rear setbacks, side and rear setbacks for new detached garages shall be as follows:
 - i. Minimum side setback per base and overlay districts;
 - ii. 5 feet minimum rear setback and no alley; and
 - iii. 3 feet minimum rear setback with alley.
- S14.** Setbacks for detached garages, accessory dwelling units (ADU), and storage sheds shall be not less than 25 feet from front and street side property lines, except:
- a. If vehicle access to a garage occurs solely from an alley, then a street-facing garage side wall shall have the same minimum setback requirement as the principal structure provided that the garage side wall has a street-facing window not less than 5 square feet in area;
 - b. If an accessory dwelling unit has street-facing entrance that conforms to primary entrance design standards, then it shall have a minimum setback requirement that is 5 feet more than the minimum setback for the principal structure; and
 - c. Along Palm Avenue only, ADU shall have the same minimum setback requirement as for principal structures, if the ADU's principal entrance conforms to primary entrance requirements.

Can we do some diagrams for these standards to explain this more in graphic form? Hard to picture.

D. Site Design

GUIDELINES

G14. Accessory buildings such as detached garages, accessory dwelling units, and storage sheds should be located as close to the rear of the property as is permitted.

1. BUILDING ARRANGEMENT

STANDARDS

S18. Building arrangement shall be as required by Development Code Section 15-903, Density and Massing Development Standards, Section 15-904, Site Design Development Standards, and Section 15-905, Facade Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

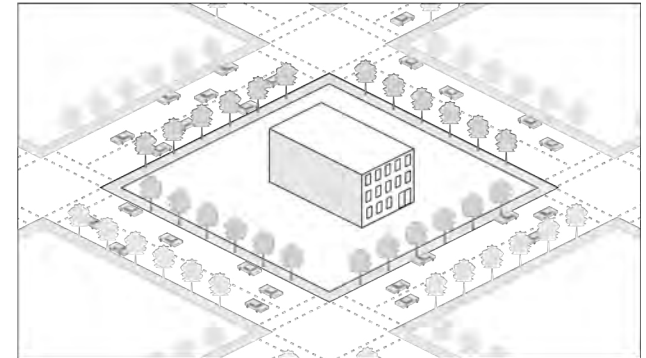
G18. In order to create a pleasant and comfortable streetscape, primary buildings should generally be located toward the front of the lot or shared courtyard, with larger yards and private spaces located behind the primary buildings.

G19. Buildings should present active fronts to public streets. Features such as entrances, windows, and balconies should be oriented to the street to keep it monitored, lively, and safe.

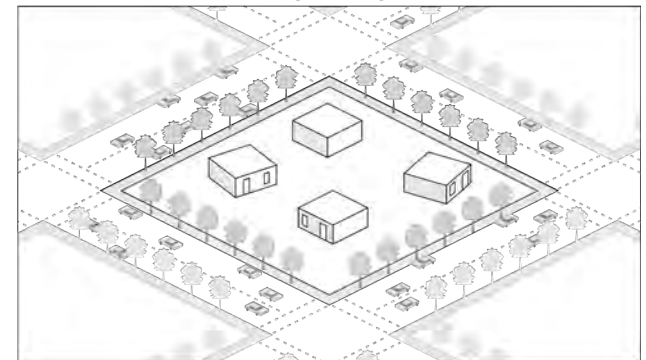
G20. There should be a clear separation between the public and private realms. Spaces that are accessible to the public should be highly visible and under casual surveillance by residents and passersby; spaces of a private nature should be inaccessible to unauthorized visitors.

G22. Street-facing building facades should be parallel relative to the adjacent street right-of-way, except where they are oriented towards a street corner.

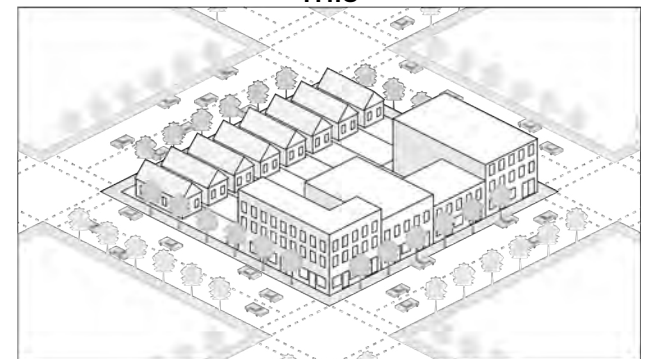
NOT THIS



NOT THIS



THIS



2. PARKING

a. Parking Access Location

STANDARDS

S22. Parking access location shall be as required by Development Code Section 15-904, Site Design Development Standards, and Article 24, Parking and Loading.

S23. When ministerial review of a development application is required by California law, driveways shall be located not less than 30 feet from the intersection of 2 public street rights-of-way. Driveway location shall otherwise be determined by the City Engineer.

S24. On-site parking shall be accessed from an alley, if alley access is possible.

S25. For corner lots without alley access, on-site parking shall be accessed from the street with the lowest Street Classification as defined by the General Plan, but in no event from a Scenic Drive unless it provides the only opportunity for site access.

S26. Along each street where parking access is allowed, each parcel shall be allowed not more than one driveway that is less than 25 feet in width.

GUIDELINES

G23. Because of the danger and inconvenience they present to pedestrians and wheelchair users, new drive approaches across the sidewalk should be limited.

G24. The width of the drive approach and driveway should be no greater than 16 feet, except where the driveway serves as a designated fire lane.



Detached Garage Behind The House. The place where the car lives should not visually dominate the streets along which people walk.



The Snout House. This garage dominates the façade of the house. The Tower District would not be a special place if homes like this were allowed to proliferate.

G25. If a lot is redeveloped, then abandoned driveways should be removed.

b. Parking Setback, Buffering, and Placement

STANDARDS

S29. Parking setback and buffering shall be as required by Development Code Section 15-903, Density and Massing Development Standards, Section 15-904, Site Design Development Standards, Section 15-905, Facade Design Development Standards, applicable Overlay District regulations, and Article 24, Parking and Loading, except to conform to setback standards described above.

GUIDELINES

G28. It is preferred that garages and carports be detached from the primary building and placed behind the primary building and toward the rear of the lot to limit visibility from the public street.

c. Parking Design

STANDARDS

S34. Parking design shall be as required by Development Code Section 15-904, Site Design Development Standards, applicable Overlay District regulations, and Article 24, Parking and Loading.

S35. Carports shall not use canvas or steel pipe.

GUIDELINES

G33. Parking areas should be designed to be without visual

We want to make sure that our standards do not allow garages on the front and dominate. The city standards will not protect us from that. Can we make that clear here?



Carports. Architecturally, these carports appear to be an extension to the residence since the columns and roofing materials of the main residence are consistent in the carport.

obstructions to allow natural surveillance.

G34. For lots with access from a street, ribbon driveways (also known as “Hollywood Drives”) are preferred over solid concrete driveways. A ribbon driveway consists of 2 concrete strips where tires pass with lawn or other landscaping between the concrete strips.

G35. When a two-car garage is proposed, in the case of an exceptionally wide lot or from a side street, landscape materials are encouraged to soften the increased amount of cement. Two adjacent ribbon driveway or landscaping in the middle of the two drives would be appropriate.

3. PEDESTRIAN ACCESS AND STREET FRONTAGE

STANDARDS

S40. Pedestrian access and street frontage shall be as required Development Code Section 15-904, Site Design Development Standards, and applicable Overlay District regulations.

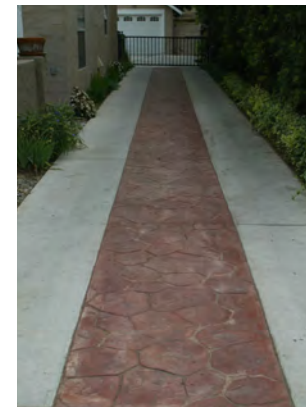
S41. Direct pedestrian access shall be provided that connects a public sidewalk along a street to every pedestrian entrance to a building.

S42. If the building is set back from the sidewalk, a paved path no less than 5 feet in width shall be provided from the public sidewalk to each building entrance. The path shall not begin at the driveway or any other point.

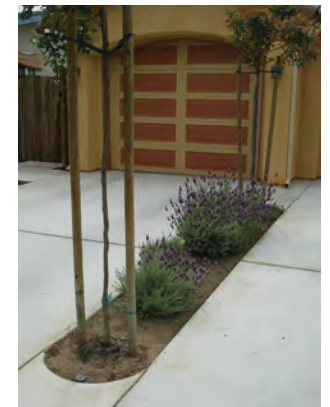
S43. Direct entrances shall be provided into all individual ground-floor dwelling units that are adjacent to a public street.



Ribbon Driveway. Preferred ribbon driveway design with lawn treatment.



Ribbon Driveway With Alternative Materials. This photo shows good use of acceptable alternative materials for ribbon driveways.



Landscape Treatment for 2 Car Garage. This corner lot, 2 car garage, appropriately uses landscaping to soften the driveway.

GUIDELINES

There are no Pedestrian Access guidelines.

4. BLOCKS, STREETS, AND ALLEYS

a. Roadway and Alley Design

STANDARDS

S47. Roadways shall be designed as determined by the General Plan Circulation Element, the Development Code including Section 15-4108, Street Design, and established City Engineering Standards. The City Engineer may review and alter proposed design, except when precluded from discretionary review by State streamlining law.

S48. Existing roadways shall not be closed or widened.

S49. Existing alleys shall not be closed, vacated, or abandoned without a finding by the Review Authority that continuation of a particular subject alley poses endangerment to the community's health and safety as determined by required findings described in Development Code Section 13-110.

S50. New alleys shall be designed as determined by the Development Code, Department of Public Works engineering standards, and the City Engineer.

S51. New development shall install new street lights where the spacing adjacent to the project is less than the average spacing along the block face and/or if an adjacent existing street light is damaged. New street lights shall conform to the following design standards:

- a. New street lights shall be no more than 18 feet in height; and



Pedestrian Access. Paths should be provided to the main entry of the house directly from the sidewalk.

Example Diagrams / Photo examples

- b. Where decorative street lights are present along any part of the project's block face, then each new street light shall match the decorative street light's pole and base, and its fixture canopy shape/profile, size, and color, except that this standard shall not apply to cobrahead lights.

S52. Hitching posts, railings, granite curbs, tree lawns, Work Progress Administration (WPA) sidewalk stamps, and gateway monuments that are 40 years old or older shall not be removed, except by permission of the Review Authority, such as to protect the stone gateway monuments on Palm and Van Ness Avenues. Where such culturally-significant elements are adjacent to a development project, their repair and their on-going maintenance shall be made a condition of approval.

GUIDELINES

G41. Alleys are encouraged because they support and reinforce neighborhood walkability, by providing vehicular access to multiple parcels within the interior of a block, while minimizing the number of vehicular driveways that cross pedestrian sidewalks.

G42. New roadways should be as narrow as possible to slow traffic, increase walkability, and create spatial definition in the streetscape.

G43. An on-street parking lane should be located on both sides of the street, except where transit stops or driveways are necessary. On-street parking should not be removed in order to create space for additional automobile travel lanes, however in some instances it may be appropriate to limit on-street parking for the provision of bicycle lanes.



Pineapple Lights. Historical pineapple lights in the Tower District should be maintained.

More photos of these items and examples

Note that this should be a balanced approach with the involvement of the neighborhood in developing any changes to accommodate bikes

G44. Historic street features that define the Tower District, including, but not limited to, streetlights, street trees, median islands, hitching posts, railings, and Craftsman-style gateways should be maintained and protected.

G45. Every effort should be made to maintain the historical lighting where it exists, such as the pineapple lights.

b. Sidewalks

STANDARDS

S53. Sidewalks in public rights-of-way shall conform to standards provided by the City Engineer.

S54. For new development on an existing street, the existing sidewalk and park strip pattern shall be maintained.

S55. For new development along a new street, the following sidewalk standards shall apply:

- a. Each side of the street shall have a sidewalk and park strip;
- b. Sidewalks shall be no less than 5 feet wide; and
- c. A park strip (an unpaved area for landscaping) shall be located between the sidewalk and the curb. The park strip shall be no less than 6 feet wide. All required street trees shall be planted in the park strip.

S56. Hedges, shrubs, and trees planted in front yards, street-facing side yards, or park strips shall be pruned and maintained in a manner which keeps the entire width of the adjacent sidewalk free and clear of obstructions, from the paved surface to a height of no less than 7 feet.



Sidewalk Zones. Sidewalks should be accompanied by street trees to create comfortable walking environments.

GUIDELINES

G46. New development should be designed to enhance pedestrians' experience as they walk along public sidewalks.

G47. Park strips should be landscaped in a manner complimentary to the adjacent front yard with materials such as lawn, groundcover, or decomposed granite.

G48. Tall, dense shrubs and hedges that impede access to vehicles parked on the street should not be planted in park strips.

c. Street Connectivity and Block Length**STANDARDS**

S60. No development project shall have a block that exceeds 500 feet in length, and new streets shall be created as needed to meet this requirement. Cul-de-sacs or other dead-end streets shall not be permitted, except where a freeway, railroad, or canal prevents connectivity.

GUIDELINES

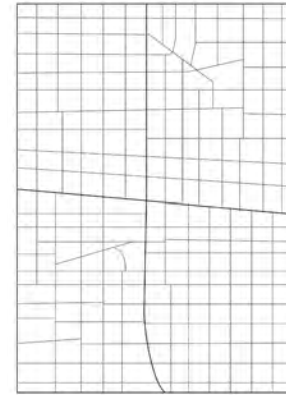
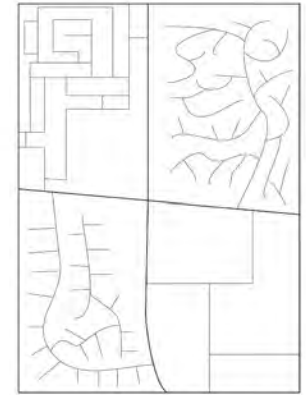
G50. The existing grid should be maintained and enhanced whenever possible.

G51. Where a direct pedestrian path is desired but a streetside sidewalk is not possible provide a **publicly accessible paseo**.

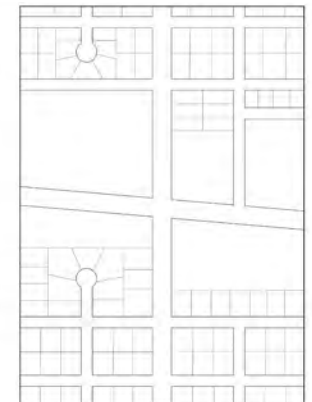
Show an example

5. ON-SITE OPEN SPACE**STANDARDS**

S61. On-site open space requirements shall be the same amount as for the RM-1 zoning designation and as described in

THIS**NOT THIS**

Street Network. Traditional neighborhood street patterns versus more circuitous suburban street patterns.

THIS**NOT THIS**

Block and Lot Patterns. Shown on the left is a traditional neighborhood block layout with frequent streets arranged in a gridiron fashion. At right, less frequent and more circuitous street connections should not be allowed.

Development Code Section 15-1004.

GUIDELINES

There are no On-site Open Space guidelines.

E. Façade Design

1. ARCHITECTURAL COMPATIBILITY

STANDARDS

S65. The architectural compatibility of buildings shall be maintained, as set forth by standards in Chapter V, Architectural Style.

S66. Garages and carports shall have the same architectural style as the primary structure. See Chapter V, Architectural Style.

S67. Building additions, building renovations, carports, and garages shall match existing and/or original primary building characteristics for roofs, cladding materials, windows, and attic vents. See Chapter V, Architectural Style.

S68. Where proposed development shares a block face with existing residential development, new construction shall maintain architectural compatibility with a neighboring adjacent street-facing facade by conforming to 3 or more of the following standards, except where it conflicts with standards to maintain compatibility with the existing and/or original primary building:

- a. Exterior cladding shall be of the same material for not less than one-half of the façade area;
- b. A ground floor building entrance shall be of the same type (i.e. porch, stoop, or interior vestibule);



New Building. New construction should fit into the neighborhood.

More examples

Diagrams or examples to clarify would really help

- c. A window bay shall be provided that is within 6 inches of the width and depth of an existing bay;
- d. Windows shall be of the same type (i.e. single-hung, double-hung, or casement) and within 6 inches of the width and height of an existing window;
- e. A horizontal cornice shall be provided that is within 2 feet of vertical distance from finished grade of an existing cornice, and is at least as tall and deep as the existing cornice;
- f. Eaves shall be of equal or greater depth; or
- g. The roof shall be the same type (i.e. hipped, gable, flat) and within 2 degrees of the same slope.

GUIDELINES

G57. New buildings should fit into their surroundings. This does not mean that the existing buildings must be copied, but that the context of any new building must be respected. Attempts should be made to connect the massing, materials, roof type, architectural style, or other techniques of the new building to that of the neighboring buildings. See Chapter V, Architectural Style.

2. FAÇADE ARTICULATION

STANDARDS

S69. Façade articulation shall be as required by Development Code Section 15-903, Density and Massing Development Standards, Section 15-905, Facade Design Development Standards, and applicable Overlay District regulations.



Roof Forms. The steep pitch and crossed gables of this Tudor home are key components to its architecture. Additions to this type of residence should maintain the same roofline.

GUIDELINES

G61. Façades should be residential in character and articulated through the use of additive elements, like bay windows, and subtractive elements, like alcoves. However, even when façades of new buildings are strongly articulated, restraint should be used in the design of the structure. The contemporary trend of the “McMansion,” with numerous gables, roof pitches, dormers, and out-of-proportion Palladian windows should be avoided in favor of more subtle approaches that blend with the more sublime historical architecture of the neighborhood.

G62. In general, building widths should be consistent with adjacent properties. On new blocks, or blocks with no established pattern, building widths of 30 to 50 feet are most appropriate.

G63. Vertical building recesses may be used to subdivide a wider building, so it has the appearance of multiple buildings of appropriate width.

3. ROOFS

STANDARDS

S78. Roofs shall be as required by Development Code Section 15-903, Density and Massing Development Standards, Section 15-905, Facade Design Development Standards, and applicable Overlay District regulations.

S79. Roof renovations and additions shall be the same roof type as exists or of the original (i.e. hipped, gabled, flat, or type listed in the Oxford Dictionary of Architecture), and within 2 degrees of existing roof slope.

Multifamily example in the single family section?

THIS



Historic Home. Calm, controlled, and beautiful.

NOT THIS



McMansion. Attractive, but too busy. Historical elements are not correctly applied.

Find more good Single family examples

GUIDELINES

G71. Generally, roofs should be pitched and not flat. Common roof types in the Tower District single-family residential areas are gabled, hipped, and gambrel roofs.

G72. For additions or renovations, the roof type, pitch, and color should be consistent with that of the original structure.

G73. For new buildings that employ historical styles, the roof type should be appropriate to the proposed architectural style.

G74. For additions or renovations of existing structures, roofing materials used should generally match the original roofing materials, particularly when the original material is tile, slate, or tin. In the case of wood shake roof replacement, use of composite materials is encouraged.



Roof Type. This tile roof is appropriate for this Mediterranean-style house.

4. CLADDING MATERIALS AND FINISHES

STANDARDS

S82. Cladding and trim shall be as required by the “Certainty Option” under Development Code Section 15-905, Facade Design Development Standards, and applicable Overlay District regulations.

S83. With renovations and additions of existing buildings, one-half or more of the area of each street-facing facade shall match the cladding of the existing or original building.

S84. In new construction, three-quarters or more of the area of each street-facing facade shall match the cladding of 1 or more neighboring adjacent buildings.

S85. Cladding materials prohibited as follows:

- a. All Vertical Siding (except board on bat and board on board);
- b. Rough sawn plain;
- c. Pressed plywood in any form, including T1-11;
- d. Kerfed Rough Sawn;
- e. Reverse Board and Batten;
- f. Metal siding;
- g. Vinyl siding;
- h. Mirrored glass; and
- i. Concrete block or cinder block that is not completely covered by an allowable finish.

S86. Exterior materials used in renovations of and additions to existing buildings shall be the same as one or more of the existing or original materials. Stucco shall not be used to replace **or cover** other materials.

[More Photos and Examples](#)

GUIDELINES

G78. For renovations and additions to existing buildings, siding materials should match the original materials. In new construction, materials should be comparable to those in the neighborhood and should be appropriate to the selected architectural style of the new construction.

G79. For existing structures with horizontal lap (clapboard) siding, every effort should be made to maintain the original materials; however, if new horizontal 6 or 8 inch siding is proposed, it should match the width and style of the original or that which is typical to the period. When new siding is installed,

the original trim of the windows and vents should be left intact.

G80. Approved siding materials are as follows:

- a. Bevel or Bungalow;
- b. Dolly Varden;
- c. Drop siding; and
- d. Tongue and groove.

G81. Stucco is only appropriate for existing homes and new homes that mimic historical styles only when stucco was the original cladding material used for that style. In cases where stucco is appropriate, the method of application must match that originally used for such homes. Generally, modern stucco applications which are highly textured, such as spatter dash, are inappropriate on historic styles such as Mediterranean and Tudor, which used a smoother troweled finish.

G82 could be added here to cover the 'knock down' finishes

5. WINDOWS

STANDARDS

S94. Windows shall be as required by Development Code Section 15-905, Facade Design Development Standards, and applicable Overlay District regulations.

S95. Windows shall be provided along all walls that are along the front and street side setbacks, and not less than 20 percent of the area of each street-facing facade shall be comprised of a window or door opening. Multiple street-facing walls shall be considered to be part of the same facade if they are parallel and face the same direction.



Appropriate Stucco. This unique stucco application is appropriate for this early ranch house. However, it would be inappropriate on a Craftsman style home.

More Photos and Examples

S96. Windows shall not be flush with solid building surfaces but shall be recessed at least 2 inches from the exterior trim or, if no trim is used, from the exterior wall plane.

S97. Horizontal sliding windows are not allowed.

S98. Any room with exterior window(s) shall have at least one window that is operable for natural ventilation, unless precluded by the California Building Code.

S99. Window glass shall be non-reflective and clear except adjacent to bathrooms.

S100. Unpainted aluminum shall not be allowed for windows or window frames.

GUIDELINES

G87. Each window should be individually articulated or paired and should not form long horizontal or vertical bands. In some styles, such as the Craftsman, windows were grouped, and this is an appropriate technique to use. However, framing at least 4 inches in width should separate individual windows in a group, and no group may have a width greater than 1.5 times the height of the group.

G88. Windows for post 1945 structures and new structures should be single-hung sash, double-hung sash, casement style, or other similar types. Horizontally sliding windows and non-opening windows should not be utilized.

G89. Windows for structures constructed prior to 1945, should have the same configuration (such as single-hung sash, double-hung sash, or casement) as the original windows. and should look as similar to the original window as possible in order to

We do have lots of examples of 'picture' windows on fronts of many homes. Should we write something to cover that?

How do we cover the Modern Styles in this?



Casement Windows. If ever replaced, the pattern, size and shape of these casement style windows should be maintained.

preserve the residence's architectural design.

G90. Windows may include glazing bars, or muntins. The addition of glazing bars can break up the house's façade and add texture to the building. On historical homes, the original muntin and pane pattern should be maintained when windows are replaced. However, it is inappropriate to install replacement windows with fake muntins when the original windows did not have muntins (i.e. were not multi-glazed).

Should be 'true divided' lites

G91. Wood window frames are preferred, whereas vinyl and aluminum window frames are discouraged.

Certainly not 'white' vinyl that is so prevalent. Can we make any mention of them being dark colors? I don't know if we will be successful in not allowing vinyl replacements?

G92. Whenever possible, upper-floor windows at the rear and sides of buildings should be placed to maximize the privacy of the neighboring properties.

G93. Replacement windows should look as similar to the original window as possible in order to preserve the residence's architectural design. Replacement windows should maintain the same size and be in the same location as the original windows. The number, size, style, and shape of window panels should be consistent with the original windows.

More Photos and Examples

G94. Where applicable, the existing original trim should remain intact when replacement windows are installed.

G95. Window screens that detract from the window are discouraged.

G97. Each window should be individually articulated and windows should not form long horizontal or vertical bands.

Unless part of that particular defined style (Prairie or Craftsman)?

6. PRIMARY ENTRANCE DESIGN

a. General

STANDARDS

S110. All primary building entrances shall have a direct path (excluding driveways) from the entrance to a public sidewalk.

b. Primary Entrances (Residential Uses)

STANDARDS

S111. Primary entrance design shall be as required by Development Code Section 15-904, Site Design Development Standards, Section 15-905, Facade Design Development Standards, and applicable Overlay District regulations.

S112. Each primary building entrance shall include a covered porch or stoop accompanied by a recessed entry door. Porches and stoops shall have horizontal dimensions that are not less than 5 feet without obstructions.

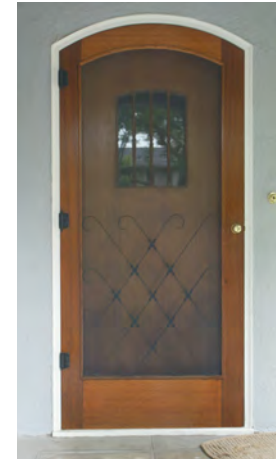
GUIDELINES

G102. Each building should be accessed through a primary entrance that faces, and is parallel to, the street.

G103. Replacement doors should be of the same type as the original or fit with the architectural style of the residence.

G104. Porches are encouraged. However, they must be attractive and incorporated architecturally into the building. Porches that are not consistent with the proportions, style, and materials of the building will be strongly discouraged. Porches should be at least 5 feet deep.

G105. Stoops are encouraged. However, they must be attractive



Screen Doors. Unlike a metal security door, this screen door is appropriate for this single family residence.

Example?

they should be integrated in the design and not look like just added on

and incorporated architecturally into the building. Stoops that are not consistent with the proportions, style, and materials of the building will be strongly discouraged.

7. ATTIC VENTS

STANDARDS

There are no design standards for attic vents.

GUIDELINES

G120. Architecturally, the attic vent is an important element in the various styles in the Tower District. The attic vent should be consistent with those in the neighborhood and relative to the style of the new building (see Chapter V, Architectural Style).

G121. Similar attic vents should be carried through to any auxiliary structure on the lot, i.e., garages, carports, accessory dwelling units, storage sheds, etc.

8. BALCONIES

STANDARDS

S121. Balconies shall be as required by Development Code Section 15-904, Site Design Development Standards, the "Certainty Option" under Section 15-905, Facade Design Development Standards, and applicable Overlay District regulations.

S122. Balconies shall be no less than 5 feet in depth, except for decorative "Juliet" balconies which have no minimum depth.



Attic Vents. Common attic vent types in the Tower District.

[More Photos and Examples](#)

GUIDELINES

G122. Balconies should not appear to be off-the-self; rather, they should be incorporated architecturally into the building, utilizing proportions, style, and materials that are consistent with the rest of the structure.

9. ACCESSORY BUILDING DESIGN

STANDARDS

S126. Accessory building design shall be as required by Development Code Section 15-2004, Accessory Buildings and Structures, and Section 15-2754, Second Dwelling Units, Backyard Cottages, and Accessory Living Quarters, and applicable Overlay District regulations.

S127. Accessory dwelling units (ADU), garages, carports, and storage sheds shall match a street-facing facade of the principal structure in at least 2 of the following ways:

- a. Same roof type (hipped, gabled, or flat) and roof pitch (within 2 degrees);
- b. Same window type (double-hung, casement, fixed), window trim, and window width;
- c. Same cladding materials as the front facade;
- d. Same attic vent size, shape, materials, and trim;
- e. Eaves shall be of equal or greater depth; or
- f. 2 or more of the same projecting exterior light fixture.

GUIDELINES

G124. Accessory buildings should carry on the same

Could we find a better example than this one? More 'tower district like?



Accessory Building Design. Accessory dwelling units should have the same materials and architectural style as the primary residents, such illustrated by this Craftsman-style ADU. (Photo credit: Fresno County.)

architectural style as that of the primary residence. See Chapter V, Architectural Style.

F. Additional Standards and Guidelines

1. FENCING

STANDARDS

S134. Front yard fencing shall be as required by Development Code Section 15-2006, Fences, Walls, and Hedges, except that chain link fencing shall be prohibited.

GUIDELINES

G135. Front yard fencing is discouraged. Fencing that encroaches beyond the plane of the front façade of the primary house is discouraged. Every effort should be made to preserve the traditional pattern of open, unfenced front yards lining the street.

G136. Fencing should match or complement the fencing materials on adjoining properties.

G137. Some of the older Craftsman-era homes and lots in the Tower District were purposefully designed to share a bermed front yard between contiguous lots. The front entrances of these homes are in some cases 3 or more feet in elevation above the sidewalk. Fencing of any type in these situations disrupts the intended street design and is discouraged.

G138. Side yard fencing should not encroach into the front yard when there is no front yard fence in place. Such placement of side yard fencing serves no purpose and disrupts the continuity of the neighborhood's front yard setback.



Front Yard Fence. These front yard fences exemplify good use of materials and height.

2. SECURITY

STANDARDS

S135. Security standards shall be as required by Development Code Article 20, General Site Regulations.

S136. Metal bars and metal mesh are prohibited on the outside of windows and doors which face a street, public plaza, or park.

GUIDELINES

G139. Front porches should not be enclosed with security fencing. Many Tower homes were specially designed to connect the porch entrance to the front yard.

G140. Alarm boxes for home security system should be placed in an inconspicuous location to limit street visibility.

3. MECHANICAL EQUIPMENT SCREENING

STANDARDS

S138. Screening of mechanical equipment shall be as required by Development Code Article 20, General Site Regulations, and Article 24, Parking and Loading.

S139. Roof-mounted mechanical equipment shall be recessed within the volume of a surrounding sloped roof or parapet walls, or panel screening.

GUIDELINES

G141. Mechanical equipment should be located on the ground, either in the back or on the side of the residence. Units placed on the ground should be screened with landscaping. When rooftop placement is necessary, the unit should be located



Rear Yard Fence. This corner lot rear yard fence is tastefully done to complement the residence. Notice the use of the landscaping along the sidewalk side of the fence and how it softens the appearance.

More bad examples would be good here.



Side Yard Fence. This side yard fence disrupts the continuity of the neighborhood front yard setback and is discouraged.

on the side or rear of the residence to limit street visibility. In addition, roof mounted units should be screened from the view of adjacent properties.

G143. The visual impacts of trash enclosures, storage areas, loading areas, and utility boxes should be visually buffered.

4. OUTDOOR LIGHTING AND ILLUMINATION

STANDARDS

S141. Outdoor lighting and illumination shall be as required by Development Code Section 15-2015, Outdoor Lighting and Illumination.

GUIDELINES

G144. Lighting fixtures should complement the architectural style of the primary structure (see Chapter V, Architectural Styles). Industrial style lighting, such as flood lighting or fluorescent lighting, is not appropriate.

G145. Lighting should be permanently fixed to a structure.

5. SIGNS

STANDARDS

S142. Signs shall be as required per Development Code Article 26 and applicable Overlay District, except that pole signs are prohibited.

GUIDELINES

There are no guidelines for signs.



Hidden Equipment. This residence's HVAC unit is located so it is not visible from the street.

[More Photos and Examples](#)

6. ART

STANDARDS

There are no design standards expressly related to art.

GUIDELINES

G160. Development should contribute art and artistic elements where they can be seen from public sidewalks, such as within front yards, as site features like fencing, and as building features like entrances.



03

RESIDENTIAL MULTI-FAMILY DISTRICTS



RESIDENTIAL MULTI-FAMILY DISTRICTS

A. Purpose

The Residential Multi-Family standards and guidelines are intended to preserve the unique character of areas with RM zoning designations while facilitating compatible infill development. RM districts are generally located near the center of the district or along major streets and are predominantly developed with small multi-family buildings such as bungalow courts and 4-plexes, however in the Tower District these areas also harmoniously accommodate small commercial structures as well as single-family homes. Residential-only projects within Commercial and Mixed-Use districts should use these standards also, such as may be allowed within the Apartment House Overlay District.

Although the numbering of the Standards and Guidelines that follow may appear nonsequential it is sequential across the document and optimal for implementation.

B. Uses

STANDARDS

S2. Uses shall be permitted, conditionally permitted, or prohibited as set forth in Development Code Section 15-1002, Use Regulations, and applicable Overlay District regulations.

GUIDELINES

G1. Development should contribute to a neighborhood that promotes walking, is human scale, and offers opportunities for “missing middle” and other forms of housing.



Apartment Houses. Typical Tower District apartment houses of the pre-WWII vintage on Van Ness Avenue.



Small four unit apartment building at Wishon and McKinley.

C. Density and Massing

1. LOT SIZE

STANDARDS

S7. No lot shall exceed 1.50 acres in area, except in the Apartment House Overlay District where the maximum lot size shall conform to the maximum lot size described in Development Code Section 15-1609. Project properties may be subdivided to meet this requirement.

GUIDELINES

G10. Encourage parking configurations that reduce the site area dedicated to parking, such as to use mechanical parking lifts and tandem parking.

2. BUILDING HEIGHT AND MASS

STANDARDS

S9. Building height and mass standards shall be as required by Development Code Section 15-1003, Density and Massing Development Standards, Article 21, TOD Height and Density Bonus, and applicable Overlay District regulations.

GUIDELINES

G12. A building mass that is within 10 feet of a front or street side setback should not be more than 60 feet wide, unless it is interrupted by a vertical recess at least 10 feet wide and 8 feet deep.

G13. Where visible from a street, building mass should appear to be of a similar scale as buildings along the same block face and across the street, such as by stepping part of the project back at a height that matches the height of its neighbors.



Suburban Style Townhouses. Buildings without clear entrances along streets not appropriate in the Tower District, nor are facades dominated by garage doors.



Street-Oriented Apartments. Contemporary multifamily development lines streets in a pedestrian-friendly way near the Tower District.

3. SETBACKS

STANDARDS

S15. Setbacks shall be as required by Development Code Section 15-1003, Density and Massing Development Standards, and applicable Overlay District regulations, except:

- a. Minimum rear and interior side setback for detached garages shall be 5 feet, or 3 feet where adjacent to alleys; and
- b. Minimum front and street side setback for garages, accessory dwelling units (ADU), and storage sheds shall be not less than 25 feet, unless:
 - i. If vehicle access to a garage occurs solely from an alley, then a street-facing garage side wall shall have the same minimum setback as the principal structure provided that the garage side wall has a street-facing window not less than 5 square feet in area; and
 - ii. If an ADU has street-facing entrance that conforms to primary entrance design standards, then it shall have a minimum setback that is 5 feet more than the minimum setback for the principal structure.

GUIDELINES

There are no setback guidelines.

D. Site Design

1. BUILDING ARRANGEMENT

STANDARDS

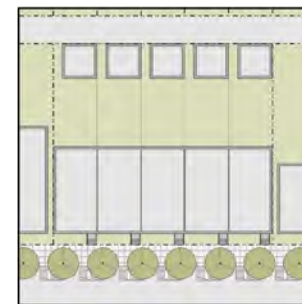
S19. Building arrangement shall be as required by Development



Victorian townhouses in San Francisco, CA



Colonial townhouses in Celebration, FL



Sample townhouse site plan

Tower examples?

Code Section 15-1003, Density and Massing Development Standards, Section 15-1004, Site Design Development Standards, and Section 15-1005, Facade Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

G18. In order to create a pleasant and comfortable streetscape, primary buildings should generally be located toward the front of the lot or shared courtyard, with larger yards and private spaces located behind the primary buildings.

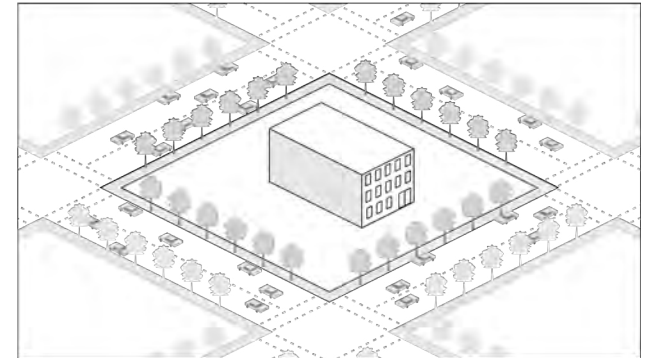
G19. Buildings should present active fronts to public streets. Features such as entrances, windows, and balconies should be oriented to the street to keep it monitored, lively, and safe.

G20. There should be a clear separation between the public and private realms. Spaces that are accessible to the public should be highly visible and under casual surveillance by residents and passersby; spaces of a private nature should be inaccessible to unauthorized visitors.

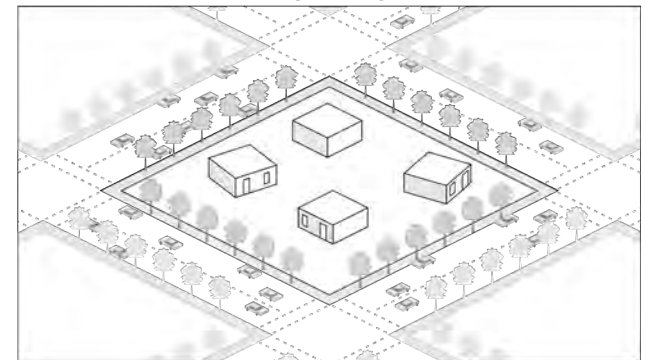
G21. On larger parcels with multiple buildings, buildings that cannot front onto a street should front onto a common (shared) open space, such as plaza, courtyard, or landscaped pedestrian passage. Pedestrian access to at-grade common open spaces should include direct access to and from a street.

G22. Street-facing building facades should be parallel relative to the adjacent street right-of-way, except where they are oriented towards a street corner.

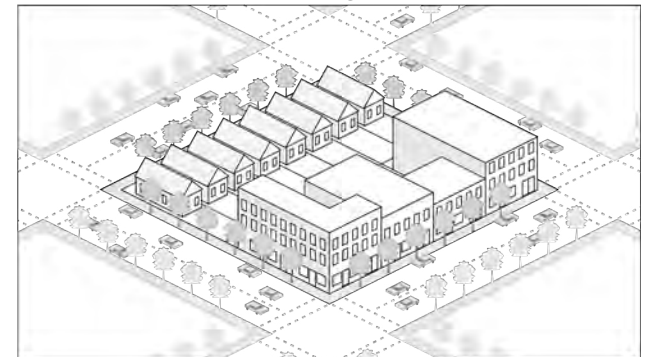
NOT THIS



NOT THIS



THIS



2. PARKING

a. Parking Access Location

STANDARDS

S23. When ministerial review of a development application is required by California law, driveways shall be located not less than 30 feet from the intersection of 2 public street rights-of-way. Driveway location shall otherwise be determined by the City Engineer.

S24. On-site parking shall be accessed from an alley, if alley access is possible.

S25. For corner lots without alley access, on-site parking shall be accessed from the street with the lowest Street Classification as defined by the General Plan, but in no event from a Scenic Drive unless it provides the only opportunity for site access.

S26. Along each street where parking access is allowed, each parcel shall be allowed not more than 1 driveway that is less than 25 feet in width.

S27. Parking access location shall be as required by Development Code Section 15-1004, Site Design Development Standards, and Article 24, Parking and Loading.

GUIDELINES

G23. Because of the danger and inconvenience they present to pedestrians and wheelchair users, drive approaches across the sidewalk should be limited.

G24. The width of the drive approach and driveway should be no greater than 16 feet, except where the driveway serves as a designated fire lane.

THIS



Parking for this apartment house is entirely behind the main structure, which is the preferred placement of parking in the Tower District.

NOT THIS



The parking lot for this apartment complex is in front of the main structure, which is never appropriate in the Tower District.

G25. If a lot is redeveloped, then abandoned driveways should be removed.

G26. If a lot with unnecessary driveways is redeveloped or significantly altered, all unnecessary driveways should be removed.

b. Parking Setback, Buffer, and Placement

STANDARDS

S30. Parking setback and buffering shall be as required by Development Code Section 15-1003, Density and Massing Development Standards, Section 15-1004, Site Design Development Standards, Section 15-1005, Facade Design Development Standards, applicable Overlay District regulations, and Article 24, Parking and Loading, except to conform to setback standards described above.

S31. Parking that is directly facing a street shall be limited by minimum frontage requirements for buildings and setback requirements for parking, as described in Development Code Table 15-1003, except that parking shall be allowed within the setback area if it is below a building and the ceiling above the parking extends not more than 3 feet above finished grade.

GUIDELINES

G29. Surface parking, carports, and private garages should be placed behind street-facing dwelling units and toward the rear of the lot to limit visibility from the public street.

G30. If surface parking, carports, or private garages are permitted to be placed adjacent to a public street, the following will apply:

More Photos and Examples

- a. Surface parking should not occupy more than 50 percent of a lot.
- b. A clearly marked pedestrian walkway should be provided from the public sidewalk to the entrance of the building.
- c. Parking should be buffered from the street with a screening wall or fence 3 feet in height in order to enclose the parking lot. Screening walls or fencing should be attractively designed and should use materials which are the same as those used in the building, or which are complimentary to the building
- d. Screening walls should be located no less than 2 feet and no more than 3 feet from the back of the sidewalk. Vegetation on or through the screening should be provided.
- e. Screening walls should have 1 pedestrian access point for every 50 feet of street frontage.

[More Photos and Examples](#)

c. Parking Design

STANDARDS

S35. Carports shall not use canvas or steel pipe.

S36. Parking design shall be as required by Development Code Section 15-1003, Density and Massing Development Standards, Section 15-1004, Site Design Development Standards, and Section 15-1005, Facade Design Development Standards, applicable Overlay District regulations, and Article 24, Parking and Loading

S37. Parking lots shall provide 1 shade tree for every 4 parking stalls. Trees should be a minimum of 15 gallons with a 1 inch

Is this more or different than the City standards?

diameter as measured 48 inches above natural grade, when planted.

GUIDELINES

G33. Parking areas should be designed to be without visual obstructions to allow natural surveillance.

G36. Underground parking areas are encouraged, as are parking garages that are concealed behind inhabitable residential space. Parking structures that are visible from the street should be as architecturally indistinguishable from the primary building as possible.

G37. Parking structures adjacent to the street should follow all guidelines set forth in this document for primary structures.

G38. Underground parking should not be visible from the street. Buildings suspended over parking areas by stilts should not be permitted.

3. PEDESTRIAN ACCESS AND STREET FRONTAGE

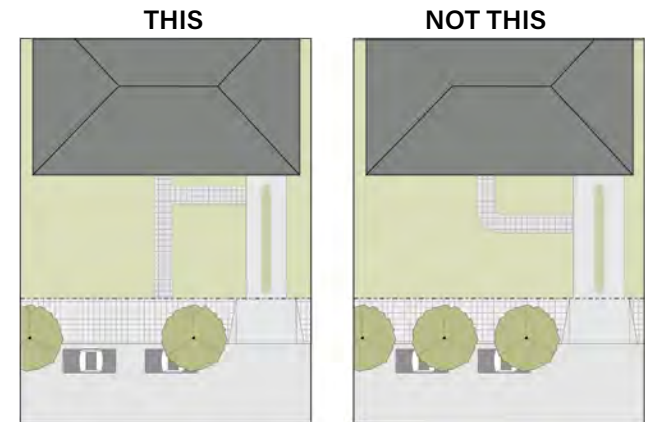
STANDARDS

S41. Direct pedestrian access shall be provided that connects a public sidewalk along a street to every pedestrian entrance to a building.

S42. If the building is set back from the sidewalk, a paved path no less than 5 feet in width shall be provided from the public sidewalk to each building entrance. The path shall not begin at the driveway or any other point.

S43. Direct entrances shall be provided into all individual

More Photos and Examples



Pedestrian Access. A direct path from the sidewalk to the front door of the house or apartment building should always be provided.

ground-floor dwelling units that are adjacent to a public street.

S44. Pedestrian access and street frontage improvement shall be as required by Development Code Section 15-1004, Site Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

There are no Pedestrian Access guidelines.

4. BLOCKS, STREETS, AND ALLEYS

a. Roadway and Alley Design

STANDARDS

S47. Roadways shall be designed as determined by the General Plan Circulation Element, the Development Code including Section 15-4108, Street Design, and established City Engineering Standards. The City Engineer may review and alter proposed design, except when precluded from discretionary review by State streamlining law.

S48. Existing roadways shall not be closed or widened.

S49. Existing alleys shall not be closed, vacated, or abandoned without a finding by the Review Authority that continuation of a particular subject alley poses endangerment to the community's health and safety as determined by required findings described in Development Code Section 13-110.

S50. New alleys shall be designed as determined by the Development Code, Department of Public Works engineering standards, and the City Engineer.

More Photos and Examples



Pineapple Lights. Historical pineapple lights in the Tower District should be maintained.

S51. New development shall install new street lights where the spacing adjacent to the project is less than the average spacing along the block face and/or if an adjacent existing street light is damaged. New street lights shall conform to the following design standards:

- a. New street lights shall be no more than 18 feet in height; and
- b. Where decorative street lights are present along any part of the project's block face, then each new street light shall match the decorative street light's pole and base, and its fixture canopy shape/profile, size, and color, except that this standard shall not apply to cobrahead lights.

S52. Hitching posts, railings, granite curbs, tree lawns, Work Progress Administration (WPA) sidewalk stamps, and gateway monuments that are 40 years old or older shall not be removed, except by permission of the Review Authority, such as to protect the stone gateway monuments on Palm and Van Ness Avenues. Where such culturally-significant elements are adjacent to a development project, their repair and their on-going maintenance shall be made a condition of approval.

GUIDELINES

G41. Alleys are encouraged because they support and reinforce neighborhood walkability, by providing vehicular access to multiple parcels within the interior of a block, while minimizing the number of vehicular driveways that cross pedestrian sidewalks.

G42. New roadways should be as narrow as possible to slow traffic, increase walkability, and create spatial definition in the



Historic monuments. Historic monuments were originally constructed to add to neighborhood identity in the Tower District, which they continue to do.



Alleys. Alleys provide mid-block vehicular access that is shared by multiple parcels, and minimize the number of driveways crossing public sidewalks.

streetscape.

G43. An on-street parking lane should be located on both sides of the street, except where transit stops or driveways are necessary. On-street parking should not be removed in order to create space for additional automobile travel lanes, however in some instances it may be appropriate to limit on-street parking for the provision of bicycle lanes.

G44. Historic street features that define the Tower District, including, but not limited to, streetlights, street trees, median islands, hitching posts, railings, and Craftsman-style gateways should be maintained and protected.

G45. Every effort should be made to maintain the historical lighting where it exists, such as the pineapple lights.

b. Sidewalks

STANDARDS

S53. Sidewalks in public rights-of-way shall conform to standards provided by the City Engineer.

S54. For new development on an existing street, the existing sidewalk and park strip pattern shall be maintained.

S55. For new development along a new street, the following sidewalk standards shall apply:

- a. Each side of the street shall have a sidewalk and park strip;
- b. Sidewalks shall be no less than 5 feet wide; and
- c. A park strip (an unpaved area for landscaping) shall be located between the sidewalk and the curb. The park strip

More Photos and Examples



Sidewalk Zones. Sidewalks should be accompanied by street trees to create comfortable walking environments.

shall be no less than 6 feet wide. All required street trees shall be planted in the park strip.

S56. Hedges, shrubs, and trees planted in front yards, street-facing side yards, or park strips shall be pruned and maintained in a manner which keeps the entire width of the adjacent sidewalk free and clear of obstructions, from the paved surface to a height of no less than 7 feet.

GUIDELINES

G46. New development should be designed to enhance pedestrians' experience as they walk along public sidewalks.

G47. Park strips should be landscaped in a manner complimentary to the adjacent front yard with materials such as lawn, groundcover, or decomposed granite.

G48. Tall, dense shrubs and hedges that impede access to vehicles parked on the street should not be planted in park strips.

c. Street Connectivity and Block Length

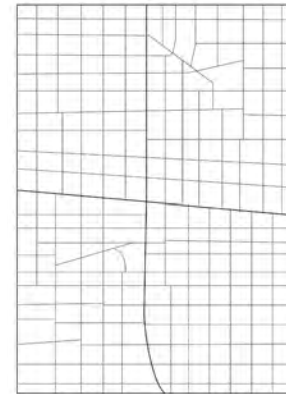
STANDARDS

S60. No development project shall have a block that exceeds 500 feet in length, and new streets shall be created as needed to meet this requirement. Cul-de-sacs or other dead-end streets shall not be permitted, except where a freeway, railroad, or canal prevents connectivity.

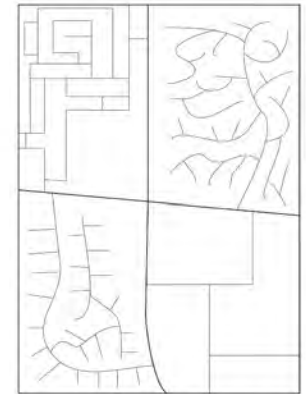
GUIDELINES

G50. The existing grid should be maintained and enhanced whenever possible.

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NOT THIS

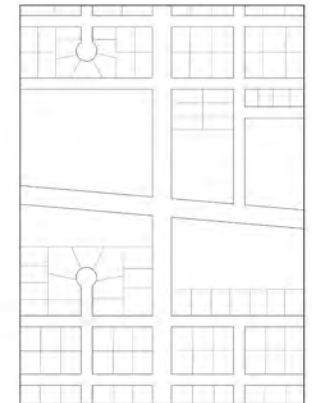


Street Network. Traditional neighborhood street patterns versus more circuitous suburban street patterns.

THIS



NOT THIS



Block and Lot Patterns. Shown on the left is a traditional neighborhood block layout with frequent streets arranged in a gridiron fashion. At right, less frequent and more circuitous street connections should not be allowed.

G51. Where a direct pedestrian path is desired but a streetside sidewalk is not possible provide a publicly accessible paseo.

5. ON-SITE OPEN SPACE

STANDARDS

S62. On-site open space shall be as required by Development Code Section 15-1004, Site Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

G53. On-site open spaces should be clearly separated from the street and should be located at the rear of the lot behind the primary building or at the center of the lot in the form of a courtyard.

G54. For existing courtyard apartments or bungalow courts, intrusions, screening, or blockage of the central courtyard is discouraged.

E. Façade Design

1. ARCHITECTURAL COMPATIBILITY

STANDARDS

S65. The architectural compatibility of buildings shall be maintained, as set forth by standards in Chapter V. Architectural Style.

S66. Garages and carports shall have the same architectural style as the primary structure. See Chapter V. Architectural Style.

S67. Building additions, building renovations, carports, and

[More Photos and Examples](#)

THIS



NOT THIS



Façade Elements. The building on the left shows good use of balconies, windows, cornices and a rooftop open space area.

garages shall match existing and/or original primary building characteristics for roofs, cladding materials, windows, and attic vents. See Chapter V, Architectural Style.

S68. Where proposed development shares a block face with existing residential development, new construction shall maintain architectural compatibility with a neighboring adjacent street-facing facade by conforming to 3 or more of the following standards, except where it conflicts with standards to maintain compatibility with the existing and/or original primary building:

- a. Exterior cladding shall be of the same material for not less than one-half of the façade area;
- b. A ground-floor building entrance shall be of the same type (i.e. porch, stoop, or interior vestibule);
- c. A window bay shall be provided that is within 6 inches of the width and depth of an existing bay;
- d. Windows shall be of the same type (i.e. single-hung, double-hung, or casement) and within 6 inches of the width and height of an existing window;
- e. A horizontal cornice shall be provided that is within 2 feet of vertical distance from finished grade of an existing cornice, and is at least as tall and deep as the existing cornice;
- f. Eaves shall be of equal or greater depth; or
- g. The roof shall be the same type (i.e. hipped, gable, flat) and within 2 degrees of the same slope.

More Photos and Examples

GUIDELINES

G57. New buildings should fit into their surroundings. This does not mean that the existing buildings must be copied, but that the context of any new building must be respected. Attempts should be made to connect the massing, materials, roof type, architectural style, or other techniques of the new building to that of the neighboring buildings. See Chapter V, Architectural Style.

2. FAÇADE ARTICULATION**STANDARDS**

S70. Facade articulation shall be as required by Development Code Section 15-1003, Density and Massing Development Standards, Section 15-1005, Facade Design Development Standards, and applicable Overlay District regulations.

S71. Above the ground-floor, at least 1 projection or recess shall be provided for every 50 horizontal feet, such that the projection or recess shall not be less than 24 inches in depth for a width of not less than four feet.

GUIDELINES

G62. In general, building widths should be consistent with adjacent properties. On new blocks, or blocks with no established pattern, building widths of 30 to 50 feet are most appropriate.

G64. Façades may be more articulated and residential in character or flatter and more urban in character. On already built-up blocks, the existing pattern should be respected.

[More Photos and Examples](#)

3. ROOFS

STANDARDS

S79. Roof renovations and additions shall be the same roof type as exists or of the original (i.e. hipped, gabled, flat, or type listed in the Oxford Dictionary of Architecture), and within 2 degrees of existing roof slope.

S80. Roofs shall be as required by Development Code Section 15-1003, Density and Massing Development Standards, Section 15-1005, Facade Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

G75. Modifications or additions to existing buildings should maintain the original roof type.

[More Photos and Examples](#)

4. CLADDING MATERIALS AND FINISHES

STANDARDS

S83. With renovations and additions of existing buildings, one-half or more of the area of each street-facing facade shall match the cladding of the existing or original building.

S85. Cladding materials prohibited as follows:

- a. All Vertical Siding (except board on bat and board on board)
- b. Rough sawn plain
- c. Pressed plywood in any form, including T1-11
- d. Kerfed Rough Sawn

- e. Reverse Board and Batten
- f. Metal siding
- g. Vinyl siding
- h. Wood siding
- i. Mirrored glass
- j. Concrete block or cinder block that is not completely covered by an allowable finish.

S86. Exterior materials used in renovations of and additions to existing buildings shall be the same as 1 or more of the existing or original materials. Stucco shall not be used to replace other **or cover other finishes** materials.

S87. Cladding and trim shall be as required by the "Certainty Option" under Development Code Section 15-1005, Facade Design Development Standards, and applicable Overlay District regulations.

S88. On existing structures, stucco shall not be used to replace any other material.

GUIDELINES

G78. For renovations and additions to existing buildings, siding materials should match the original materials. In new construction, materials should be comparable to those in the neighborhood and should be appropriate to the selected architectural style of the new construction.

G82. Stucco finishes should be smooth or lightly textured types such as Santa Barbara Finish, Fine Float Finish, Fine Sand Finish, or Medium Sand Finish. Modern stucco finishes

such as Knockdown Dash, Lace, or Arizona are inappropriate and should not be utilized. Contemporary accent materials such as stacked stone are also inappropriate and should be avoided.

5. WINDOWS

STANDARDS

S95. Windows shall be provided along all walls that are along the front and street side setbacks, and not less than 20 percent of the area of each street-facing facade shall be comprised of a window or door opening. Multiple street-facing walls shall be considered to be part of the same facade if they are parallel and face the same direction.

S96. Windows shall not be flush with solid building surfaces, but shall be recessed at least 2 inches from the exterior trim or, if no trim is used, from the exterior wall plane.

S97. Horizontal sliding windows are not allowed.

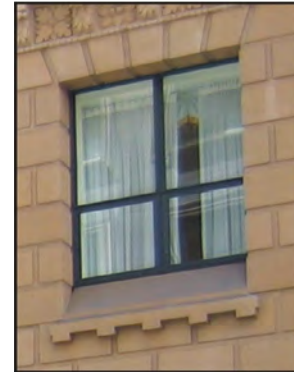
S98. Any room with exterior window(s) shall have at least one window that is operable for natural ventilation, unless precluded by the California Building Code.

S99. Window glass shall be non-reflective and clear except adjacent to bathrooms.

S100. Unpainted aluminum shall not be allowed for windows or window frames.

S101. Windows shall be as required by the "Certainty Option" under Development Code Section 15-1005, Facade Design Development Standards, and applicable Overlay District regulations.

THIS



NOT THIS



Windows. Windows should be recessed from the exterior wall, and window frames should be vertically proportioned.

More Photos and Examples

GUIDELINES

G92. Whenever possible, upper-floor windows at the rear and sides of buildings should be placed to maximize the privacy of the neighboring properties.

G93. Replacement windows should look as similar to the original window as possible in order to preserve the residence's architectural design. Replacement windows should maintain the same size and be in the same location as the original windows. The number, size, style, and shape of window panels should be consistent with the original windows.

G94. Where applicable, the existing original trim should remain intact when replacement windows are installed.

G95. Window screens that detract from the window are discouraged.

G96. Windows should maintain the same style and spacing along all sides of building.

G97. Each window should be individually articulated and windows should not form long horizontal or vertical bands.

G98. Windows should be single-hung, double-hung, casement, or other similar types. Non-opening windows are inappropriate.

6. PRIMARY ENTRANCE DESIGN

a. General

STANDARDS

S110. All primary building entrances shall have a direct path (excluding driveways) from the entrance to a public sidewalk.

More Photos and Examples



Façade Elements. This Tower District apartment house shows good use of balconies, porches, stoops, cornices, and internal stairways.

b. Primary Entrances (Residential Uses)**STANDARDS**

S112. Each primary building entrance shall include a covered porch or stoop accompanied by a recessed entry door. Porches and stoops shall have horizontal dimensions that are not less than 5 feet without obstructions.

S113. Primary entrance design shall be as required by Development Code Section 15-1004, Site Design Development Standards, the "Certainty Option" under Development Code Section 15-1005, Facade Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

G106. Direct entrances should be provided into all individual ground-floor dwelling units or commercial spaces which are adjacent to a public street. The doorways of such entrances should be parallel to the sidewalk, except where they face a street corner. Secondary entrances that do not face a street are allowed, but not in lieu of a street-facing entrance.

G107. Dwelling units located on the ground floor and not adjacent to a public street or located on upper floors, should be accessed through a common entrance that faces, and is parallel to, the street. Secondary entrances that do not face a street are allowed, but not in lieu of a street-facing entrance.

G108. In multi-family residential buildings oriented around a central courtyard, dwelling units should have their primary entrance facing the courtyard, with the exception of units adjacent to a public street, which must have their primary entrance facing the street.

More Photos and Examples

G109. For modifications to existing buildings, replacement doors should be of the same type as the original or fit with the architectural style of the residence (see Chapter V, Architectural Style). Metal security doors are not appropriate.

G110. Porches are encouraged at primary entrances, and should follow the following guidelines:

- a. Incorporated architecturally into the building, utilizing proportions, style, and materials that are consistent with the rest of the building;
- b. Height above the adjacent grade to be no less than 18 inches and no more than 4 feet;
- c. Depth to be no less than 5 feet and no more than 15 feet; and
- d. Width to be no less than 8 feet.

G111. Stoops are encouraged at street-facing entrances, and should follow the following guidelines:

- a. Incorporated architecturally into the building, utilizing proportions, style, and materials that are consistent with the rest of the building.
- b. Height above the adjacent grade to be no less than 2 feet and no more than 4 feet.
- c. Depth of the landing at the top of the stoop to be no less than 5 feet and no more than 15 feet.
- d. Width to be no less than 4 feet and no more than 8 feet.
- e. If a stoop is provided at a street-facing entrance, an ADA compliant entrance must also be provided into that space which can serve as the primary entrance.

More Photos and Examples



Stoops. Stoops are most appropriate for rowhouses and townhouses, but can also be used for apartment houses.

7. ATTIC VENTS

STANDARDS

There are no design standards for attic vents.

GUIDELINES

G120. Architecturally, the attic vent is an important element in the various styles in the Tower District. The attic vent should be consistent with those in the neighborhood and relative to the style of the new building (see Chapter V, Architectural Style).

G121. Similar attic vents should be carried through to any auxiliary structure on the lot, i.e., garages, carports, accessory dwelling units, storage sheds, etc.

[More Photos and Examples](#)

8. BALCONIES

STANDARDS

S122. Balconies shall be no less than 5 feet in depth, except for decorative "Juliet" balconies which have no minimum depth.

S123. Balconies shall be as required by Development Code Section 15-1004, Site Design Development Standards, the "Certainty Option" under Section 15-1005, Facade Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

G123. Balconies are encouraged and should at a minimum apply the following design principles:

- a. Incorporated architecturally into the building, utilizing proportions, style, and materials that are consistent with

the rest of the building;

- b. Dimension to the bottom of the balcony should be no less than 8 feet above the adjacent grade or top of sidewalk;
- c. Depth should be no less than 5 feet and no more than 10 feet;
- d. Width should be no less than 8 feet; and
- e. Project no more than 4 feet into the public right-of-way, subject to an encroachment permit and California Building Code standards.

9. ACCESSORY BUILDING DESIGN

STANDARDS

S126. Accessory building design shall be as required by Development Code Section 15-2004, Accessory Buildings and Structures, and Section 15-2754, Second Dwelling Units, Backyard Cottages, and Accessory Living Quarters, and applicable Overlay District regulations.

S127. Accessory dwelling units (ADU), garages, carports, and storage sheds shall match a street-facing facade of the principal structure in at least 2 of the following ways:

- a. Same roof type (hipped, gabled, or flat) and roof pitch (within 2 degrees);
- b. Same window type (double-hung, casement, fixed), window trim, and window width;
- c. Same cladding materials as the front facade;
- d. Same attic vent size, shape, materials, and trim;

[More Photos and Examples](#)

- e. Eaves shall be of equal or greater depth; or
- f. 2 or more of the same projecting exterior light fixture.

GUIDELINES

G125. Accessory buildings should be located behind the main building. If visible from the street, accessory buildings should carry on the same architectural style as that of the primary residence. See Chapter V, Architectural Style.

10. EXTERNAL STAIRWAYS AND CORRIDORS

STANDARDS

S129. External stairways and corridors that are not fully enclosed within a building and are used for accessing spaces above the ground floor, shall be as required by the "Certainty Option" within Development Code Section 15-1005, Facade Design Development Regulations, and applicable Overlay District regulations.

GUIDELINES

G127. External stairways and corridors located within 30 feet of a public street should be incorporated architecturally into the building, utilizing proportions, style, and materials that are consistent with the rest of the building.

G128. External stairways located within 30 feet of a public street should not have open risers and should be located behind a partial wall or fin that hides the stairs and railing. The partial wall or fin should utilize the same materials as the rest of the building.

More Photos and Examples

F. Additional Standards and Guidelines

1. FENCING

STANDARDS

S134. Front yard fencing shall be as required by Development Code Section 15-2006, Fences, Walls, and Hedges, except that chain link fencing shall be prohibited.

GUIDELINES

There are no fencing guidelines.

2. SECURITY

STANDARDS

S135. Security standards shall be as required by Development Code Article 20, General Site Regulations.

S136. Metal bars and metal mesh are prohibited on the outside of windows and doors which face a street, public plaza, or park.

GUIDELINES

G139. Front porches should not be enclosed with security fencing. Many Tower homes were specially designed to connect the porch entrance to the front yard.

G140. Alarm boxes for home security system should be placed in an inconspicuous location to limit street visibility.

3. MECHANICAL EQUIPMENT SCREENING

STANDARDS

S138. Screening of mechanical equipment shall be as required by Development Code Article 20, General Site Regulations, and

[More Photos and Examples](#)

Article 24, Parking and Loading.

S139. Roof-mounted mechanical equipment shall be recessed within the volume of a surrounding sloped roof or parapet walls, or panel screening.

GUIDELINES

G141. Mechanical equipment should be located on the ground, either in the back or on the side of the residence. Units placed on the ground should be screened with landscaping. When rooftop placement is necessary, the unit should be located on the side or rear of the residence to limit street visibility. In addition, roof mounted units should be screened from the view of adjacent properties.

G143. The visual impacts of trash enclosures, storage areas, loading areas, and utility boxes should be visually buffered.

[More Photos and Examples](#)

4. OUTDOOR LIGHTING AND ILLUMINATION

STANDARDS

S141. Outdoor lighting and illumination shall be as required by Development Code Section 15-2015, Outdoor Lighting and Illumination.

GUIDELINES

G144. Lighting fixtures should complement the architectural style of the primary structure (see Chapter V, Architectural Styles). Industrial style lighting, such as flood lighting or fluorescent lighting, is not appropriate.

G146. Parking areas should be well lit for security.

G147. Lighting, other than parking lot lighting, should be permanently fixed to the structure.

5. SIGNS

a. General

STANDARDS

S142. Signs shall be as required per Development Code Article 26 and applicable Overlay District, except that pole signs are prohibited.

GUIDELINES

G148. Building identification signs should be no greater than 25 square feet in area and should be attached to the façade, parallel to the façade, or above the main entrance to the building.

[More Photos and Examples](#)

6. ART

STANDARDS

There are no standards expressly related to art.

GUIDELINES

G160. Development should contribute art and artistic elements where they can be seen from public sidewalks, such as within front yards, as site features like fencing, and as building features like entrances.

04

MIXED-USE AND COMMERCIAL DISTRICTS



MIXED-USE AND COMMERCIAL DISTRICTS

A. Purpose

The Mixed-Use and Commercial Districts standards and guidelines are intended to preserve the unique character of areas with MX and C zoning designations while facilitating compatible infill development. MX and C districts are generally located along major streets where small pedestrian-oriented commercial storefronts were built historically. There are usually no front or side building setbacks, with structures built right up to the sidewalk, standing shoulder-to-shoulder with their neighbors and framing the street and its activity spatially. Buildings face the street with windows and entrances, rather than parking lots that are usually located behind the buildings. In the Tower District, housing was often built on upper floors. Along MX and C district corridors residential structures were built along commercial uses historically, and these standards promote continuous storefronts and pedestrian activity, except where ground-floor residential is expressly allowed by the Affordable Housing Overlay district regulations and under California law.

Although the numbering of the Standards and Guidelines that follow may appear nonsequential it is sequential across the document and optimal for implementation.

B. Uses

STANDARDS

S3. Uses shall be permitted, conditionally permitted, or prohibited as set forth in Development Code Section 15-1102 and 15-1202, Use Regulations, and any applicable Overlay District regulations, except that new uses within the Automobile/Vehicle Sales and Services use category and Drive-In and



Commercial Mixed-Use Area

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Drive-Through Facilities noted in Development Code Table 15-1102 shall not be allowed with a Conditional Use Permit.

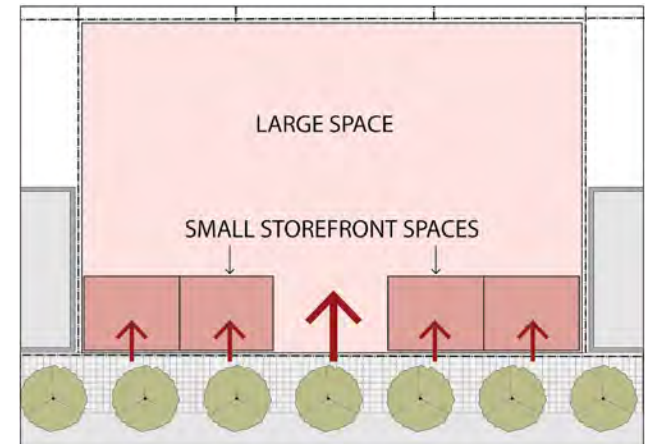
S4. The interior space behind the required storefronts shall be available for one or more allowable commercial and/or public uses for a depth of not less than 30 feet and shall be directly accessible from a public sidewalk. Residential uses shall not be allowed within 30 feet of the storefront building frontage, except for residential entrance vestibules and stairs, and as are allowed within the Affordable Housing Overlay District and under California law.

S5. A single ground-floor commercial space shall not have a street-adjacent building frontage that exceeds 50 feet in width. This requirement may be met by locating separate commercial spaces along the building frontage, if the separate spaces are at least 30 feet deep and have direct access from a public sidewalk.

GUIDELINES

G2. Maintain storefronts at ground-floor level along commercial shopping streets. These storefronts should have uses that help activate the public sidewalks they face. Commercial retail, restaurant, service, community service, and destination uses are encouraged.

G3. In general, individual ground-floor spaces should not exceed 10,000 square feet in size. Exceptions should be made for grocery stores, theaters, and other desirable commercial destinations. Exceptions should not be made for retail stores, restaurants, office uses, or lodging. "Big box" style retailing is not appropriate.



Large Retail Spaces. Shown above is an example of "wrapping" a large single use with smaller storefront spaces. In instances where a large single space is appropriate, it must be dealt with using this technique.

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G4. When a large use is appropriate, it should be “wrapped” with small storefronts at the ground-level. An excellent example of this technique is the Tower Theater. Doing so will prevent large expanses of inactive sidewalk and will keep the street area lively.

G5. The development of residential and office uses are encouraged on upper floors to add housing and employment opportunities and increase patronage of local businesses.

C. Density and Massing

1. LOT SIZE

STANDARDS

S7. No lot shall exceed 1.50 acres in area, except in the Apartment House Overlay District where the maximum lot size shall conform to the maximum lot size described in Development Code Section 15-1609. Project properties may be subdivided to meet this requirement.

GUIDELINES

G10. Encourage parking configurations that reduce the site area dedicated to parking, such as to use mechanical parking lifts and tandem parking.

2. BUILDING HEIGHT AND MASS

STANDARDS

S10. Building height and mass shall be as required by Development Code Section 15-1103 and 15-1203, Density and Massing Development Standards, Article 21, TOD Height and Density Bonus, and applicable Overlay District regulations.

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S11. All new primary structures shall have a minimum height of 2 stories. Renovations to existing structures shall be exempt from this requirement.

S12. Within 10 feet of a front or street side setback, buildings shall not be more than 4 stories in height, except to allow a tower element within 20 feet of a street intersection.

GUIDELINES

G13. Where visible from a street, building mass should appear to be of a similar scale as buildings along the same block face and across the street, such as by stepping part of the project back at a height that matches the height of its neighbors.

3. SETBACKS

STANDARDS

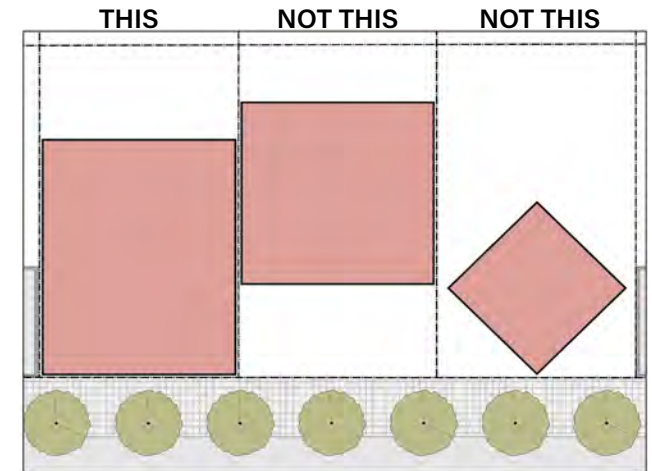
S16. Setbacks shall be as required by Development Code Section 15-1103 and 15-1203, Density and Massing Development Standards, and applicable Overlay District regulations.

S17. Setback landscaping shall be subject to Development Code Article 23, Landscape.

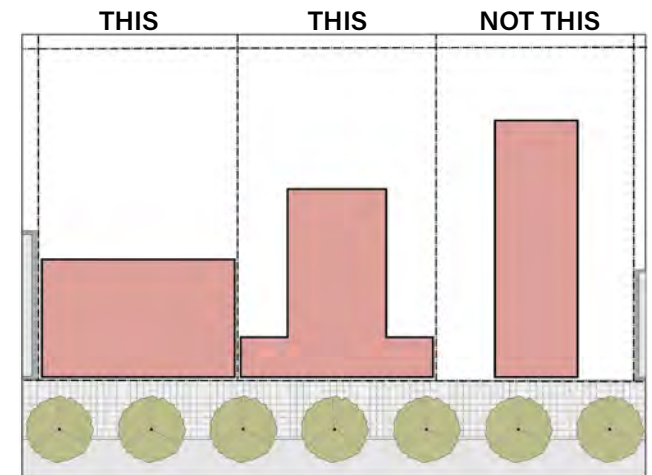
GUIDELINES

G15. Primary buildings should not be set back from the street unless it is for the purpose of providing a wider sidewalk, outdoor dining area, paseo, or plaza.

G16. Interior side setbacks should not be provided. Buildings should stand shoulder-to-shoulder, without gaps between them, forming a solid continuous streetwall. Continuous streetwalls



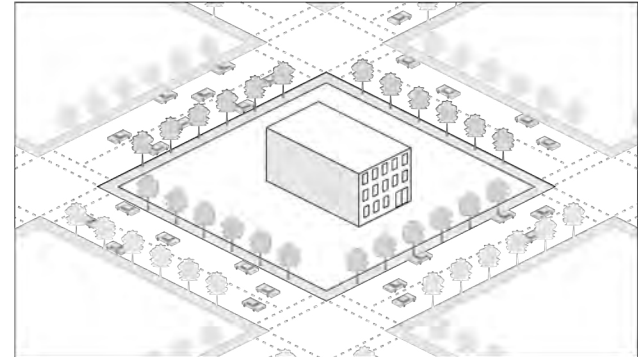
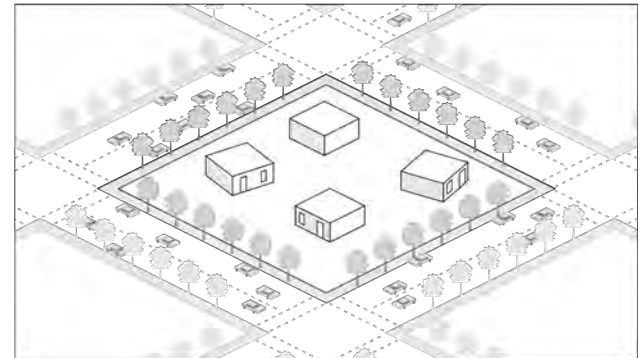
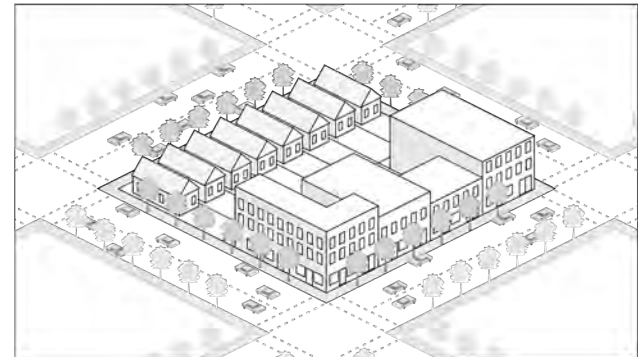
Front Setbacks and Building Orientation. In the “Main Street” area buildings should be brought right up to the street, with no front setbacks. Front setbacks inconvenience pedestrians, degrade the definition of the street as a public place, and leads to highway-strip signage that must “shout” at passing motorists.



Side Setbacks. Main Street buildings should be built shoulder-to-shoulder to form a continuous street wall.

spatially define the street, creating a pleasant pedestrian environment and forms a clear separation between the public and private realms. In particular, the front 12 feet of a building should be built out to the side lot lines, unless a side setback is necessary for vehicular access or a pedestrian passage. The side walls beyond the front 12 feet may be set back.

G17. For corner lots, street side setbacks should be treated like the front of the lot, and buildings should not be set back from the side street.

NOT THIS**NOT THIS****THIS**

D. Site Design

1. BUILDING ARRANGEMENT

STANDARDS

S20. Building arrangement standards shall be as required by Development Code Section 15-1103 and 15-1203, Density and Massing Development Standards, Section 15-1104 and 15-1204, Site Design Development Standards, and Section 15-1105 and 15-1205, Facade Design Development Standards, and applicable Overlay District regulations.

S21. Along front and side street setbacks, building walls shall be parallel or perpendicular to the adjacent street right-of-way except within 5 feet of a building entrance.

GUIDELINES

G18. In order to create a pleasant and comfortable streetscape, primary buildings should generally be located toward the front of the lot or shared courtyard, with larger yards and private spaces located behind the primary buildings.

G19. Buildings should present active fronts to public streets.

Features such as entrances, windows, and balconies should be oriented to the street to keep it monitored, lively, and safe.

G20. There should be a clear separation between the public and private realms. Spaces that are accessible to the public should be highly visible and under casual surveillance by residents and passersby; spaces of a private nature should be inaccessible to unauthorized visitors.

G21. On larger parcels with multiple buildings, buildings that cannot front onto a street should front onto a common (shared) open space, such as plaza, courtyard, or landscaped pedestrian passage. Pedestrian access to at-grade common open spaces should include direct access to and from a street.

G22. Street-facing building facades should be parallel relative to the adjacent street right-of-way, except where they are oriented towards a street corner.

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2. PARKING

Due to its mixed-use, walkable nature, parking should be addressed differently in the Tower District than in other areas of the City. While many visitors may arrive via an automobile, they typically only park once, and then walk from destination to destination thereafter, unlike suburban locations where visitors usually drive and re-park from destination to destination.

a. Parking Access Location

STANDARDS

S23. When ministerial review of a development application is required by California law, driveways shall be located not less

than 30 feet from the intersection of 2 public street rights-of-way. Driveway location shall otherwise be determined by the City Engineer.

S24. On-site parking shall be accessed from an alley, if alley access is possible.

S25. For corner lots without alley access, on-site parking shall be accessed from the street with the lowest Street Classification as defined by the General Plan, but in no event from a Scenic Drive unless it provides the only opportunity for site access.

S26. Along each street where parking access is allowed, each parcel shall be allowed not more than 1 driveway that is less than 25 feet in width.

S28. Parking access location shall be as required by Development Code Section 15-1104 and 15-1204, Site Design Development Standards, applicable Overlay District regulations, and Article 24 Parking and Loading.

GUIDELINES

G23. Because of the danger and inconvenience they present to pedestrians and wheelchair users, new drive approaches across the sidewalk should be limited.

G25. If a lot is redeveloped, then abandoned driveways should be removed.

G26. If a lot with unnecessary driveways is redeveloped or significantly altered, all unnecessary driveways should be removed.

G27. For interior lots without alley access, the project applicant should work to share side street access with a neighboring

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property through an easement or reciprocal access agreement. If this is not possible, access will be permitted consistent with established standards.

b. Parking Setback, Buffer, and Placement

STANDARDS

S32. Parking setback and buffering standards shall be as required by Development Code Section 15-1103 and 15-1203, Density and Massing Development Standards, Section 15-1104 and 15-1204, Site Design Development Standards, Section 15-1105 and 15-1205, Facade Design Development Standards, applicable Overlay District regulations, and Article 24, Parking and Loading.

S33. Parking that is directly facing a street shall be limited by minimum frontage requirements for buildings and setback requirements for parking, as described in Development Code Table 15-1103 and 15-1203, except that parking shall be allowed within the setback area if it is below a building and the ceiling above the parking extends not more than 3 feet above finished grade.

GUIDELINES

G30. If surface parking, carports, or private garages are permitted to be placed adjacent to a public street, the following apply:

- a. Surface parking should not occupy more than 50 percent of a lot;
- b. A clearly marked pedestrian walkway should be provided from the public sidewalk to the entrance of the building;

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- c. Parking should be buffered from the street with a screening wall or fence 3 feet in height in order to enclose the parking lot. Screening walls or fencing should be attractively designed and should use materials which are the same as those used in the building, or which are complimentary to the building;
- d. Screening walls should be located no less than 2 feet and no more than 3 feet from the back of the sidewalk. Vegetation on or through the screening should be provided; and
- e. Screening walls should have 1 pedestrian access point for every 50 feet of street frontage.

G31. Underground parking areas are encouraged. Parking structures located at the front of the lot must be wrapped with storefronts at street-level.

G32. Surface parking, carports, and private garages should be placed toward the rear of the lot to limit visibility from the public street.

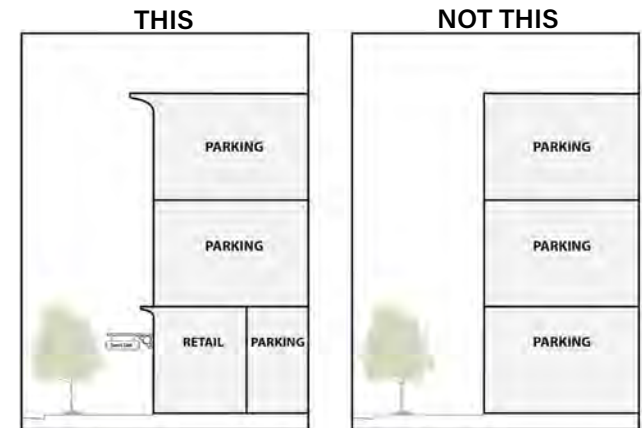
c. Parking Design

STANDARDS

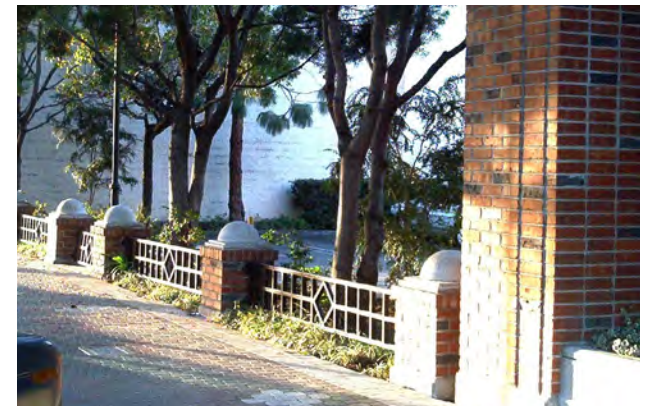
S35. Carports shall not use canvas or steel pipe.

S37. Parking lots shall provide 1 shade tree for every 4 parking stalls. Trees should be a minimum of 15 gallons with a one-inch diameter as measured 48 inches above natural grade, when planted.

S39. Garage and carports shall use columns and roofing materials that are the same as the primary building. Carport



Parking Structure Design. Parking garages should be lined with retail storefronts at the street-level, and not blank walls or visible parking levels.



Parking Lot Screening Wall. Parking lots which are located adjacent to a street should be bordered by a screening wall.

columns should not be less than 5 inches in width and depth.

GUIDELINES

G33. Parking areas should be designed to be without visual obstructions to allow natural surveillance.

G38. Underground parking should not be visible from the street. Buildings suspended over parking areas by stilts should not be permitted.

G39. Private garages and carports should maintain the same architectural style of the primary building. Design elements such as roof pitch, cladding materials, attic vents, and windows should match that of the primary building.

G40. Where the upper floors of parking structures are visible, they should have an architectural appearance indistinguishable from residential floors of buildings.

3. PEDESTRIAN ACCESS AND STREET FRONTAGES

STANDARDS

S41. Direct pedestrian access shall be provided that connects a public sidewalk along a street to every pedestrian entrance to a building.

S42. If the building is set back from the sidewalk, a paved path no less than 5 feet in width shall be provided from the public sidewalk to each building entrance. The path shall not begin at the driveway or any other point.

S45. Pedestrian access and street frontage shall be as required by Development Code Section 15-1105 and 15-1205, Site Design

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Location of Vehicular Access. Vehicular access should be kept away from the principal shopping street wherever possible. Alleys are the first priority for site access, and side streets are also acceptable. The principal street should only be used if there are no other options.

Development Standards, Section 15-2423, Circulation and Safety, and applicable Overlay District regulations.

S46. Direct entrances shall be provided into all individual ground-floor dwelling units or commercial spaces which are adjacent to a public street.

GUIDELINES

There are no pedestrian access and street frontage guidelines.

4. BLOCKS, STREETS, AND ALLEYS

a. Roadway and Alley Design

STANDARDS

S47. Roadways shall be designed as determined by the General Plan Circulation Element, the Development Code including Section 15-4108, Street Design, and established City Engineering Standards. The City Engineer may review and alter proposed design, except when precluded from discretionary review by State streamlining law.

S48. Existing roadways shall not be closed or widened.

S49. Existing alleys shall not be closed, vacated, or abandoned without a finding by the Review Authority that continuation of a particular subject alley poses endangerment to the community's health and safety as determined by required findings described in Development Code Section 13-110.

S50. New alleys shall be designed as determined by the Development Code, Department of Public Works engineering standards, and the City Engineer.

More Photos and Examples

S51. New development shall install new street lights where the spacing adjacent to the project is less than the average spacing along the block face and/or if an adjacent existing street light is damaged. New street lights shall conform to the following design standards:

- a. New street lights shall be no more than 18 feet in height; and
- b. Where decorative street lights are present along any part of the project's block face, then each new street light shall match the decorative street light's pole and base, and its fixture canopy shape/profile, size, and color, except that this standard shall not apply to cobrahead lights.

S52. Hitching posts, railings, granite curbs, tree lawns, Work Progress Administration (WPA) sidewalk stamps, and gateway monuments that are 40 years old or older shall not be removed, except by permission of the Review Authority, such as to protect the stone gateway monuments on Palm and Van Ness Avenues. Where such culturally-significant elements are adjacent to a development project, their repair and their on-going maintenance shall be made a condition of approval.

GUIDELINES

G41. Alleys are encouraged because they support and reinforce neighborhood walkability, by providing vehicular access to multiple parcels within the interior of a block, while minimizing the number of vehicular driveways that cross pedestrian sidewalks.

G42. New roadways should be as narrow as possible to slow traffic, increase walkability, and create spatial definition in the streetscape.



Pineapple Lights. Historical pineapple lights in the Tower District should be maintained.

More Photos and Examples

G43. An on-street parking lane should be located on both sides of the street, except where transit stops or driveways are necessary. On-street parking should not be removed in order to create space for additional automobile travel lanes, however in some instances it may be appropriate to limit on-street parking for the provision of bicycle lanes.

G44. Historic street features that define the Tower District, including, but not limited to, streetlights, street trees, median islands, hitching posts, railings, and Craftsman-style gateways should be maintained and protected.

G45. Every effort should be made to maintain the historical lighting where it exists, such as the pineapple lights.

b. Sidewalks

STANDARDS

S57. Sidewalks in public rights-of-way shall conform to Development Code Section 15-1105 and 15-1205, Facade Design Development Standards, Section 15-4108, Street Design, and established City Engineering Standards. Sidewalk design may be subject to review and adjustment by the City Engineer, except when limited by State streamlining law.

S58. Sidewalks adjacent to the project shall be no less than 10 feet wide, except to allow tree wells along a block face that has existing or proposed storefronts, and to allow a landscape strip along a side street that has no storefronts. Where the distance between existing curb and property line is less than 10 feet, the curb location may be moved at the discretion of the City Engineer, otherwise the ground floor of the building shall be setback to meet this standard.



Sidewalk Zones. Where sidewalks are lined by pedestrian-oriented storefronts, sidewalks should contain an outer furniture area, a clear central walkway, and, when there's enough room, an inner furniture area.

Maybe find a better. cleaner example without the sandwich board?

S59. Sidewalks shall maintain an uninterrupted path of travel at least 5 feet wide.

GUIDELINES

G46. New development should be designed to enhance pedestrians' experience as they walk along public sidewalks.

G49. A sidewalk adjacent to storefronts should provide for uninterrupted pedestrian flow and space for sidewalk activities and amenities as follows:

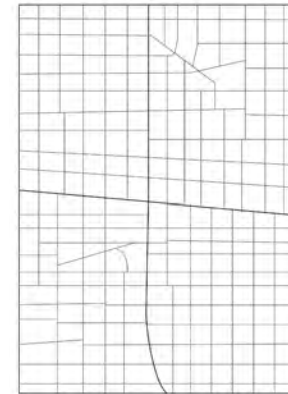
- a. The sidewalk should be divided into 3 zones: an outer furniture area, a central walkway, and an inner furniture area;
- b. The outer furniture area should occupy no more than 40 percent of the sidewalk width, provided there is sufficient walkway area. Streetlights, street trees, vending machines, bike racks, benches, transit shelters, and other street furniture should be located in this area. If there is sufficient space, tables may be placed here by adjacent businesses; and
- c. The inner furniture area should occupy no more than 20 percent of the sidewalk width, provided there is sufficient walkway area. Benches and dining tables may be placed here by adjacent businesses. Sidewalks narrower than 8 feet should not have an inner furniture zone.

c. Street Connectivity and Block Length

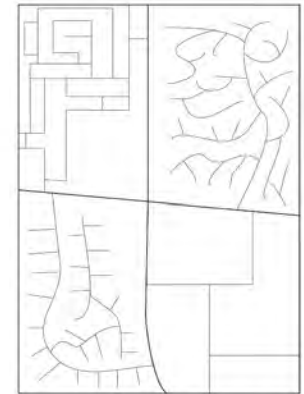
STANDARDS

S60. No development project shall have a block that exceeds 500 feet in length, and new streets shall be created as needed

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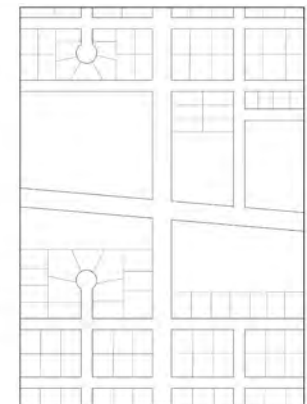


Street Network. Traditional neighborhood street patterns versus more circuitous suburban street patterns.

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Block and Lot Patterns. Shown on the left is a traditional neighborhood block layout with frequent streets arranged in a gridiron fashion. At right, less frequent and more circuitous street connections should not be allowed.

to meet this requirement. Cul-de-sacs or other dead-end streets shall not be permitted, except where a freeway, railroad, or canal prevents connectivity.

GUIDELINES

G50. The existing grid should be maintained and enhanced whenever possible.

5. ON-SITE OPEN SPACE

STANDARDS

S63. On-site open space shall be as required by Development Code Section 15-1105 and 15-1205, Site Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

G52. Property owners should routinely maintain landscaping including the replacement of any diseased or dead plant/tree. Trees should not be topped; instead, trees should be pruned to encourage upward growth and tree canopy development.

G53. On-site open spaces should be clearly separated from the street and should be located at the rear of the lot behind the primary building or at the center of the lot in the form of a courtyard.

G54. For existing courtyard apartments or bungalow courts, intrusions, screening, or blockage of the central courtyard is discouraged.



"Main Street." Throughout America, shopping streets are lined by pedestrian-oriented retail along sidewalks with residential apartments and other uses above.



Pedestrian-oriented Retail. A "Main Street" area in downtown San Luis Obispo, California.

More Photos and Examples

6. MIXED-USE CONFIGURATIONS

STANDARDS

S64. Mixed-use configuration shall be as required by Development Code Section 15-1103 and 15-1203, Density and Massing Development Standards, Section 15-1104 and 15-1204, Site Design Development Standards, and Section 15-1105 and 15-1205, Facade Design Development Standards, and applicable Overlay District regulations including Section 15-1609, Affordable Housing Overlay District.

GUIDELINES

G55. Mixed-use buildings should be designed to minimize potential conflicts between residential and commercial uses adjacent to one another or within the same building. Potential techniques include providing distinct entries and circulation hallways for commercial and residential suites/units, providing rooftop mechanical ventilation of ground-floor commercial uses so as not to disrupt upper-floor residential tenants, and installing soundproofing in walls and floors between uses.

G56. The arrangement of uses within a mixed-use building should comply with the following:

- a. Retail uses should generally be limited to the ground floor adjacent to the sidewalk and the basement or second floor of buildings may have limited retail uses, either as a continuation of a street-level retail use, or as separate spaces with their own sidewalk entrance;
- b. Office uses should generally be located on upper floors but may also occupy basement levels or rear portions of the ground-floor that are no less than 30 feet from the



Automobile-Oriented Commercial. Suburban-style highway development is not compatible with the Tower District and should not be permitted.

This is the Blackstone corridor that we have at our edges. Does this address it adequately? Might make a specific reference?

More Photos and Examples



Mixed-Use Building. Within a Mediterranean style vocabulary, residential uses are located on the upper two floors, while the retail is at the street-level.

front setback; and

- c. Residential uses should generally be located on upper floors.

E. Façade Design

1. ARCHITECTURAL COMPATIBILITY STANDARDS

S65. The architectural compatibility of buildings shall be maintained, as set forth by standards in Chapter V, Architectural Style.

S66. Garages and carports shall have the same architectural style as the primary structure. See Chapter V, Architectural Style.

S67. Building additions, building renovations, carports, and garages shall match existing and/or original primary building characteristics for roofs, cladding materials, windows, and attic vents. See Chapter V, Architectural Style.

S68. Where proposed development shares a block face with existing residential development, new construction shall maintain architectural compatibility with a neighboring adjacent street-facing facade by conforming to 3 or more of the following standards, except where it conflicts with standards to maintain compatibility with the existing and/or original primary building:

- a. Exterior cladding shall be of the same material for not less than one-half of the façade area;
- b. A ground-floor building entrance shall be of the same type (i.e. porch, stoop, or interior vestibule);
- c. A window bay shall be provided that is within 6 inches of



Block Corners. This new building in Downtown Mountain View, California, gives appropriate architectural prominence to the block corner.

the width and depth of an existing bay;

- d. Windows shall be of the same type (i.e. single-hung, double-hung, or casement) and within 6 inches of the width and height of an existing window;
- e. A horizontal cornice shall be provided that is within 2 feet of vertical distance from finished grade of an existing cornice, and is at least as tall and deep as the existing cornice;
- f. Eaves shall be of equal or greater depth; or
- g. The roof shall be the same type (i.e. hipped, gable, flat) and within 2 degrees of the same slope.

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GUIDELINES

G57. New buildings should fit into their surroundings. This does not mean that the existing buildings must be copied, but that the context of any new building must be respected. Attempts should be made to connect the massing, materials, roof type, architectural style, or other techniques of the new building to that of the neighboring buildings. See Chapter V, Architectural Style.

G58. Materials used in the renovation of and addition to existing buildings should be consistent with the existing materials and/or original materials at the time of first construction.

MIXED-USE FAÇADE GLOSSARY OF TERMS

Bulkhead – A “kickplate” at the bottom of a storefront bay below the display windows, usually made of tile, stone, or carved wood panels.

Cornice – A projecting, continuous, prominent architectural feature near the top of a building.

Display Windows – Windows that are specifically designed to allow for the presentation of merchandise to pedestrians.

Double-hung Window – A two-part window, with upper and lower sashes that open by sliding vertically on pulleys.

Façade – The exterior wall of a building, particularly a wall that faces a street.

Fascia – The horizontal area of the storefront façade that is below the storefront cornice and above the entry and display windows.

Parapet – A low, solid, wall or railing along the edge of a roof that blocks visibility to rooftop equipment.

Pier – A vertical support that divides storefront bays.

Storefront Bay – A vertical division of the street-level façade that consists of piers, a frieze, display windows, and a bulkhead.

Transom Window – A hinged window over a door.



2. FAÇADE ARTICULATION

STANDARDS

S71. Above the ground floor, at least 1 projection or recess shall be provided for every 50 horizontal feet, such that the projection or recess shall not be less than 24 inches in depth for a width of not less than 4 feet.

S72. Façade articulation shall be as required by Development Code Section 15-1103 and 15-1203, Density and Massing Development Standards, Section 15-1105 and 15-1205, Facade Design Development Standards, and applicable Overlay District regulations.

S73. For each street-facing building facade that is over 100 feet wide, a portion of the street-facing façade shall be setback a minimum of 2 feet for not less than 20 feet.

S74. For ground-floor facades adjacent to front property lines, windows and doors with transparent glazing shall comprise not less than 60 percent of the building wall area located between 2 and 7 feet above the public sidewalk.

S75. Storefront windows and interior space shall be designed to allow an unobstructed view into the interior space for a depth of not less than 10 feet, except to allow lighted display windows of not less than 2 feet in depth for up to one-third of the combined width of building storefronts.

S76. Assemblages of ground-floor entrances and windows shall be framed by columns, piers, or pilasters spaced not more than 25 feet apart. Each column, pier, or pilaster should protrude outward from adjacent windows 3 to 6 inches.

S77. A visual distinction shall be provided between ground-

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NOT THIS



Façade Articulation: Mixed-use and commercial buildings should achieve visual interest with architectural elements such as columns, pilasters and cornices, and avoid over use of recesses and complicated massing.

More Photos and Examples

level and upper-level floors where facades are within 20 feet of a front property line. The ground-level and upper-level facades shall be distinguished with at least 2 of the following:

- a. Different materials;
- b. Different colors; or
- c. Horizontal cornice that is not less than 12 inches in height and 2 inches in depth.

GUIDELINES

G59. Facades that are within 20 feet of a front or street side setback should not have windowless walls. Windowless walls repel pedestrians because they make pedestrians feel unsafe and provide no visual interest.

G60. Ground-floor windows should generally be comprised of large storefront windows that allow pedestrians to view into the interior space for not less than 10 feet or a lighted display space for not less than 3 feet.

G65. In general, façades should be relatively simple and flat and should address the street squarely. Rather than using radical setbacks and recesses to create visual interest, pilasters, columns, cornices, and similar forms of surface relief should be used.

G66. Columns, piers, and pilasters that separate storefronts should be 1 to 3 feet wide and should be made of a solid material, such as brick, stone, or wood.

G67. Each commercial bay should have a fascia area, which is a horizontal wall surface between piers, above the windows and doors, and below the storefront cornice. This is the preferred

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location for wall signs. Storefront fascia should be uniform in size throughout the building and should range from 2 to 5 feet in height.

G68. All buildings should implement a treatment on the bulkhead wall of the building façade. Bulkhead tiles should be ceramic. The bulkhead should serve as the visual “base” of the buildings and should protrude slightly from the surfaces above it.

G69. Multi-storied buildings should use a decorative storefront cornice to differentiate the street-level storefronts from the upper floors.

G70. Areas of buildings that occupy the corner of a block should be architecturally embellished to give prominence to the corner. Turrets, towers, bay windows, cupolas, and other methods should be used to make the block corner stand out.

[More Photos and Examples](#)

3. ROOFS

STANDARDS

S79. Roof renovations and additions shall be the same roof type as exists or of the original (i.e. hipped, gabled, flat, or type listed in the Oxford Dictionary of Architecture), and within 2 degrees of existing roof slope.

S81. Roofs shall be as required by Development Code Section 15-1103 and 15-1203, Density and Massing Development Standards, Section 15-1105 and 15-1205, Facade Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

G76. Roofs, as viewed from the street, should generally be flat and not pitched.

G77. Parapets, cornices, and other architectural methods should be used to add distinction and ornamentation to buildings.

4. CLADDING MATERIALS AND FINISHES**STANDARDS**

S85. Cladding materials prohibited as follows:

- a. All Vertical Siding (except board on bat and board on board);
- b. Rough sawn plain;
- c. Pressed plywood in any form, including T1-11;
- d. Kerfed Rough Sawn;
- e. Reverse Board and Batten;
- f. Metal siding;
- g. Vinyl siding;
- h. Mirrored glass; and
- i. Concrete block or cinder block that is not completely covered by an allowable finish.

S88. On existing structures, stucco shall not be used to replace any other material.

S89. Cladding shall be as required by the "Certainty Option" under Development Code Section 15-1105 and 15-1205, Facade

More Photos and Examples



Visual Distinction between Upper and Lower Floors.
This building uses different colors and materials to distinguish the street-level storefronts from the upper-level apartments.

Design Development Standards, and applicable Overlay District regulations.

S90. Allowable materials include brick, cementitious panels, carved wood panels, stone, and stucco. Stucco, when used, shall not use a textured application such as spatter dash and shall be accompanied by a metal-reinforced horizontal expansion/control joints spaced more than 15 feet apart. As part of ground-floor storefronts, metal frames are allowed where surrounded by other materials, within which metal spandrel panels are allowed.

S91. Storefront window frames and doors shall be made of metal or wood. Doors shall have the same material as adjacent storefront window frames.

S92. Each building shall not have more than 2 primary cladding materials.

S93. Metal pieces, panels, and fasteners affixed to the exterior surface of a building or accessory structure shall be resistant to corrosion.

GUIDELINES

G83. The materials “palette” for cladding and trim should be kept very simple.

G84. Building primary cladding materials should convey a sense of strength and solidity.

G85. Decorative accent materials should be brick, ceramic tile, pre-cast concrete, molded plaster, carved wood, or other similar materials.

G86. Corporate design elements for chain businesses should be downplayed to assure integration in the neighborhood.

More Photos and Examples

5. WINDOWS

STANDARDS

S98. Any room with exterior window(s) shall have at least one window that is operable for natural ventilation, unless precluded by the California Building Code.

S102. Windows shall be as required by the “Certainty Option” under Development Code Section 15-1105 and 15-1205, Facade Design Development Standards, and applicable Overlay District regulations.

S103. Windows shall be provided along all walls that are along the front and street side setbacks.

S104. For upper floors walls along front setback lines and ground-floor walls along street side setback lines, at least 20 percent but no more than 50 percent of the wall area shall consist of windows.

S105. Upper-floor windows shall be as tall or taller than they are wide, but they may be grouped within wall openings that are wider than they are tall if the individual windows are separated by a post that is not less than 3 inches in width.

S106. Upper-floor windows shall not be flush with solid building surfaces but shall be recessed at least 2 inches from the exterior trim or, if no trim is used, from the exterior wall plane.

S107. Upper-floor windows shall be single-hung, double-hung, or casement. Horizontal sliding windows are not allowed.

S108. Glass shall be clear and not reflective or tinted, except adjacent to bathrooms. Curtain wall systems with glass uninterrupted by walls or posts on the exterior shall not be permitted.



Windows. Windowless walls repel pedestrians and are inappropriate for any wall facing a street in the Tower District.

THIS



NOT THIS



Window Rhythms. Windows should be arranged to have understandable and pleasing patterns of sizing and spacing—both vertically and horizontally—within a building façade.

S109. Wood, vinyl, and factory-painted metal window frames shall be used. Unpainted aluminum window frames shall not be used.

GUIDELINES

G99. Windows on upper floors should maintain coherent and consistent rhythms, both vertically and horizontally. Random and jumbled sizing and spacing of windows should be avoided.

G100. Each window or small set of windows should be individually articulated and should not form long horizontal or vertical bands.

G101. Frames should be shaped and molded to provide visual interest and relief to the façade.

6. PRIMARY ENTRANCE DESIGN

a. General

STANDARDS

S110. All primary building entrances shall have a direct path (excluding driveways) from the entrance to a public sidewalk.

b. Individual Entrances (Residential Uses)

STANDARDS

S112. Each primary building entrance shall include a covered porch or stoop accompanied by a recessed entry door. Porches and stoops shall have horizontal dimensions that are not less than 5 feet without obstructions.

S114. Primary entrance design shall be as required by Development Code Section 15-1104 and 15-1204, Site Design

More Photos and Examples



Separated Residential and Retail Entrances. This small mixed-use building has separate entrances for direct residential entry and retail accompanied by shop windows.

Development Standards, the “Certainty Option” under Section 15-1105 and 15-1205, Facade Design Development Standards, and applicable Overlay District regulations.

GUIDELINES

G106. Direct entrances should be provided into all individual ground-floor dwelling units or commercial spaces which are adjacent to a public street. The doorways of such entrances should be parallel to the sidewalk, except where they face a street corner. Secondary entrances that do not face a street are allowed, but not in lieu of a street-facing entrance.

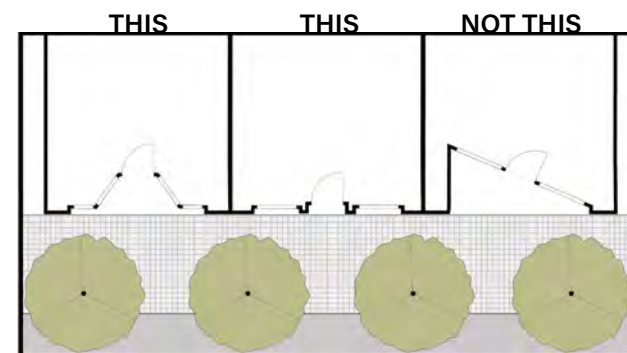
G108. In multi-family residential buildings oriented around a central courtyard, dwelling units should have their primary entrance facing the courtyard, with the exception of units adjacent to a public street, which must have their primary entrance facing the street.

G109. For modifications to existing buildings, replacement doors should be of the same type as the original or fit with the architectural style of the residence (see Chapter V, Architectural Style). Metal security doors are not appropriate.

G112. Where there are ground-floor residential units, porches and/or stoops are encouraged at primary entrances. Porches and stoops should be incorporated architecturally into the building, utilizing proportions, style, and materials that are consistent with the rest of the building. Porches and stoops should be no more than 4 feet above finished grade.



Recessed Storefront Entrance. Doors into retail spaces may be recessed within the façade, so doors don’t swing into sidewalks, and entry should be at same grade as the adjacent sidewalk.



Storefront Orientation. Storefronts, even when they have recessed entries, must parallel the sidewalk.

c. Storefront Entrances (Commercial and Community Uses)

STANDARDS

S115. For buildings divided to have multiple ground-floor storefront spaces, each individual space on the first floor which is adjacent to a front property line shall have its own separate storefront entrance at the front of the building oriented to the public sidewalk. The doorways of such entrances shall be parallel to the sidewalk, unless they face a street corner.

S116. Along front property lines, an entrance to a ground-floor storefront space shall occur not more than 50 feet apart.

S117. Storefront entrances shall be at the same grade as the sidewalk, and no steps, up or down, shall be required for entry, except if the Fresno Metropolitan Flood Control District or other agency requires that the first floor be elevated above the sidewalk grade. Raised entrances shall be ADA-compliant entry.

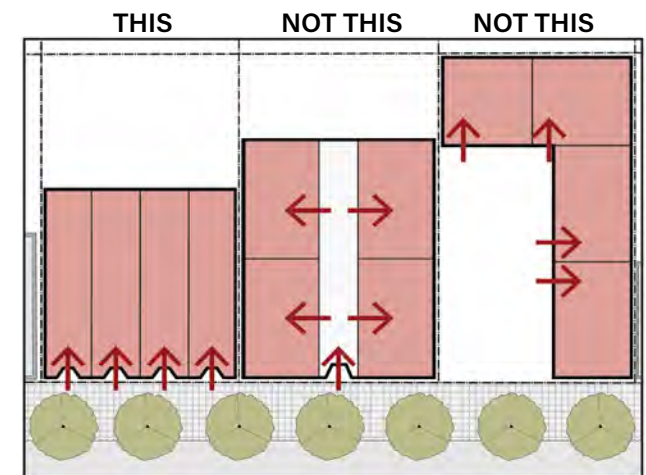
GUIDELINES

G113. Direct entrances into individual commercial establishments should be designed as storefronts (which for the purposes of this section includes retail, restaurants, bars, offices, personal services, but not uses of a more civic nature such as theaters, churches, schools, and libraries).

G114. There should usually be one distinct commercial space located behind each commercial bay, but if a large commercial space spans multiple bays, the structure of storefront bays should remain. Secondary bays that are part of a large retail space would usually not have doors, just windows. Direct entrances from the sidewalk into ground-floor commercial establishments which are adjacent to streets should be



Storefront Bays. This building shows a human-scaled division of a street-level façade into a series of storefront bays.



Retail Entrances. Each individual ground-level space should have its own pedestrian entrance facing the street.

provided at a rate of no less than 1 per 50 feet of linear street frontage. When establishments with a greater length occupy a site, they should be set back and wrapped with smaller spaces that will satisfy this requirement. Each bay should be defined by storefront piers and should include a door, display windows, a fascia, a bulkhead, and a transom.

G115. Ground-floor commercial uses which have any frontage along a public sidewalk should not be arranged around an inner circulation system in a mall-like setting. Secondary entrances that do not face a sidewalk are allowed, but not in lieu of a street-facing entrance.

G116. Where allowed, storefront entrances that are elevated above the adjacent public sidewalk should use a ramp that extends to each individual entrance or a ramp to a raised walkway that serves multiple storefront entrances. The raised walkway should be not less than 5 feet wide and match the level of the ground-floor. The raised walkway should be setback from the property line not less than 2 feet, with the setback landscaped except to allow for stairs spaced not less than 50 feet apart.

d. Common Entrances (Residential, Commercial, and Civic) **STANDARDS**

S118. Uses that are not on the ground-floor or are not adjacent to a public street shall be accessed through a common entrance that faces a street.

S119. Individual dwelling units and commercial spaces shall be accessed through an interior circulation system, except where they can be provided directly from a side street.



Bulkheads. Bulkheads at the base of buildings are more visible and need to be more durable, such as through the use of tile as seen in the Tower District.

More Photos and Examples

S120. The common entrance shall be covered by an awning or canopy or shall be recessed into the building up to 6 feet, except that recesses for civic entrances may be greater. The width of a common entrance and associated recesses, canopies, windows, and architectural features shall be not less than 6 feet.

GUIDELINES

G117. The suburban practice of giving each apartment its own outside entrance, accessed from shared outdoor corridors is inappropriate. Secondary entrances may be provided in the rear to access open space or parking, but not in lieu of a street-facing entrance.

G118. The entrance should be clearly differentiated from entrances into individual commercial or residential spaces through the use of decorative columns or similar ornamentation flanking the entrance, by aligning the entrance with prominent architectural features on upper floors, or through color and material changes.

G119. Entrances into uses of a civic nature, including theaters, churches, schools, and libraries should be grand and easy to identify due to their public nature.

7. BALCONIES

STANDARDS

S124. Balconies shall be as required by Development Code Section 15-1104 and 15-1204, Site Design Development Standards, the “Certainty Option” under Section 15-1105 and 15-1205, Facade Design Development Standards, and applicable

More Photos and Examples



Balconies. Balconies should be beautiful, and should be architecturally incorporated into the design of the building, rather than just being added on as an afterthought.

Overlay District regulations.

S125. Balconies shall be no less than 5 feet in depth and shall not extend more than 3 feet in front of the adjacent facade, except for decorative “Juliet” balconies which have no minimum depth. If the balcony would project into a public right-of-way, the Review Authority can make a determination as to whether an encroachment permit will be granted prior to project application.

GUIDELINES

G123. Balconies are encouraged and should at a minimum apply the following design principles:

- a. Incorporated architecturally into the building, utilizing proportions, style, and materials that are consistent with the rest of the building;
- b. Dimension to the bottom of the balcony should be no less than 8 feet above the adjacent grade or top of sidewalk;
- c. Depth should be no less than 5 feet and no more than 10 feet;
- d. Width should be no less than 8 feet; and
- e. Project no more than 4 feet into the public right-of-way, subject to an encroachment permit and California Building Code standards.

[More Photos and Examples](#)

8. ACCESSORY BUILDING DESIGN

STANDARDS

S126. Accessory building design shall be as required by Development Code Section 15-2004, Accessory Buildings

and Structures, and Section 15-2754, Second Dwelling Units, Backyard Cottages, and Accessory Living Quarters, and applicable Overlay District regulations.

S127. Accessory dwelling units (ADU), garages, carports, and storage sheds shall match a street-facing facade of the principal structure in at least 2 of the following ways:

- a. Same roof type (hipped, gabled, or flat) and roof pitch (within 2 degrees);
- b. Same window type (double-hung, casement, fixed), window trim, and window width;
- c. Same cladding materials as the front facade;
- d. Same attic vent size, shape, materials, and trim;
- e. Eaves shall be of equal or greater depth; or
- f. 2 or more of the same projecting exterior light fixture.

S128. Accessory buildings that are visible from the street shall only use exterior cladding materials that are the same as are used in the street-facing facade(s) of the primary structure.

GUIDELINES

G125. Accessory buildings should be located behind the main building. If visible from the street, accessory buildings should carry on the same architectural style as that of the primary residence. See Chapter V, Architectural Style.

9. EXTERNAL STAIRWAYS AND CORRIDORS

STANDARDS

S130. External stairways and corridors that are not fully

More Photos and Examples

enclosed within a building and are used for accessing spaces above the ground-floor, shall be as required by the “Certainty Option” within Development Code Section 15-1105 and 15-1205, Facade Design Development Regulations, and applicable Overlay District regulations.

GUIDELINES

G126. With the exception of steps for access for ground-floor spaces, external stairways and exterior corridors shall not be located between the primary façade of the building and a public street.

G128. External stairways located within 30 feet of a public street should not have open risers and should be located behind a partial wall or fin that hides the stairs and railing. The partial wall or fin should utilize the same materials as the rest of the building.

10. AWNINGS AND CANOPIES

STANDARDS

S131. Awnings and canopies shall be as required by Development Code Section 15-1104 and 15-1204, Site Design Development Standards, the “Certainty Option” under Section 15-1105 and 15-1205, Facade Design Development Standards, and applicable Overlay District regulations.

S132. Ground-floor entrances, within the allowable front setbacks, shall be sheltered from above by an exterior awning and/or rigid canopy, which extends horizontally at least 3 feet from the front façade. The bottom of awnings and canopies shall

[More Photos and Examples](#)



Awning Profile. Awnings should be triangular in profile, and not rectangular or round.

be at least 8 feet above finished grade. If the awning or canopy could project into a public right-of-way, the Review Authority can make a determination as to whether an encroachment permit will be granted prior to project application, and this requirement shall not apply where an encroachment permit would be required but is denied.

S133. Street-level awnings and rigid canopies may extend horizontally over multiple windows but not beyond each window and entry assemblage framed by columns, piers, or pilasters, as required under Facade Articulation.

GUIDELINES

G129. The use of window canopies and awnings is encouraged on both street-level floors and upper floors.

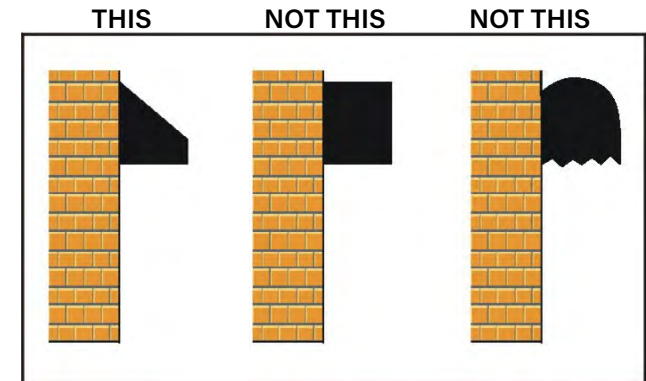
G130. Awnings should be constructed out of canvas or other similar materials.

G131. Awnings should be of a traditional, triangular profile shape, as opposed to square or rectangle, or round.

G132. Retractable awnings are strongly encouraged.

G133. Upper-floor awnings and other canopies should be located directly over the windows and should be the same width as the window.

G134. Street-level awnings and canopies should leave 8 feet of vertical clearance over the sidewalk, and should not interfere with street trees, streetlights, or traffic.



Awning Profiles. Awnings should be triangular in profile. Rounded and boxed awnings are discouraged.

[More Photos and Examples](#)

F. Additional Standards and Guidelines

1. FENCING

STANDARDS

S134. Front yard fencing shall be as required by Development Code Section 15-2006, Fences, Walls, and Hedges, except that chain link fencing shall be prohibited.

GUIDELINES

There are no fencing guidelines.

[More Photos and Examples](#)

2. SECURITY

STANDARDS

S135. Security standards shall be as required by Development Code Article 20, General Site Regulations.

S137. Security bars and roll-down security doors are prohibited on the outside of windows and doors which face a street, public plaza, or park unless stored in a concealed space.

GUIDELINES

There are no guidelines for security features.

3. MECHANICAL EQUIPMENT SCREENING

STANDARDS

S138. Screening of mechanical equipment shall be as required by Development Code Article 20, General Site Regulations, and Article 24, Parking and Loading.

S139. Roof-mounted mechanical equipment shall be recessed within the volume of a surrounding sloped roof or parapet walls,

or panel screening.

S140. Roof-mounted mechanical equipment and elevator penthouses shall be screened by a parapet wall that is as high as the equipment or entirely within the roof. Parapet wall materials shall be consistent with materials used for the rest of the façade.

GUIDELINES

G142. Parapets and roofs used to screen mechanical equipment should be integrated within and match the architectural style of the building.

G143. The visual impacts of trash enclosures, storage areas, loading areas, and utility boxes should be visually buffered.

4. OUTDOOR LIGHTING AND ILLUMINATION

STANDARDS

S141. Outdoor lighting and illumination shall be as required by Development Code Section 15-2015, Outdoor Lighting and Illumination.

GUIDELINES

G144. Lighting fixtures should complement the architectural style of the primary structure (see Chapter V, Architectural Styles). Industrial style lighting, such as flood lighting or fluorescent lighting, is not appropriate.

G146. Parking areas should be well lit for security.

G147. Lighting, other than parking lot lighting, should be permanently fixed to the structure.

[More Photos and Examples](#)



Building Attached Lighting. The lighting on this Tower District establishment complements the style of the architecture and is encouraged.

5. SIGNS

a. General

STANDARDS

S142. Signs shall be as required per Development Code Article 26 and applicable Overlay District, except that pole signs are prohibited.

S143. Signs shall be as required per Development Code Article 26 and applicable Overlay District, except that the following types are prohibited: pole, monument, internally-illuminated, free-standing, and plywood that are not part of a box sign.

S144. Signage shall not cover windows, grillwork, pilasters, cornices, and ornamental features.

S145. All electrical conduit shall be concealed from public view.

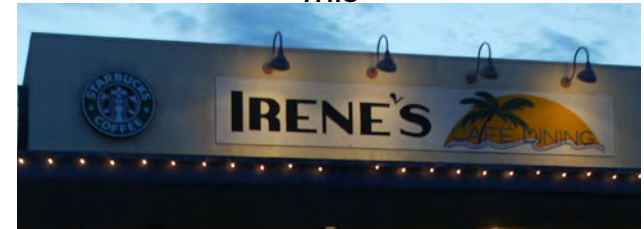
GUIDELINES

G149. Signage should be architecturally integrated with the building's design and should not obscure architectural features of the building. Signs should be mounted in locations that respect the design of a building.

G150. Signs should adhere to the following:

- Internally illuminated "can" signs are inappropriate and are discouraged; **Show one?**
- Painted wall signs should be designed and applied by a professional and should be of high quality;
- Constructed of high quality materials that are appropriate to a pedestrian environment, such as wood, metal, or neon;

THIS



NOT THIS



Externally Illuminated Signage. The pictures above are examples of externally illuminated signs. Wall signs should fit completely within storefront bay and should not obscure any architectural features of the building. Wall signs should not cover up pilasters or otherwise extend beyond a storefront bay.

I think we can find some more and clearer 'bad' examples too

- d. Have individual raised lettering and should be externally illuminated; and
- e. Content limited to the business name or logo.

b. Wall Signs

STANDARDS

See General standards above.

GUIDELINES

G151. Wall signs are the preferred sign type for indicating the name and nature of a business located within a retail storefront. Wall signs should adhere to the following:

- a. Locate on storefront fascias and friezes.
- b. Do not locate within the storefront pier except for barbershop poles, restaurant menus, and upper-floor tenant directories.
- c. When located on fascias, friezes, lintels, piers, spandrels, and other areas, they should be sized to fit within these surfaces and not extend beyond them.
- d. Center over the corresponding storefront entrance. If a large store spans multiple commercial bays, center over the whole frontage occupied by the store.

c. Window Signs

STANDARDS

S146. Total coverage of signs on the exterior or interior of ground-floor windows shall not exceed 20 percent of the total ground-floor window area of each building.



Painted Wall and Awning Signs. This building tastefully incorporates both a painted wall sign and an awning sign.



Wall Sign



Window Sign

Find a better example for 'window signs'?

Show some neon good examples?

GUIDELINES

G152. Window signs should not contain product advertising.

d. Awning Signs**STANDARDS**

S147. Lettering on awnings shall be no higher than 10 inches.

GUIDELINES

G153. Signage on awnings should be located on the valence and not on the angled portion of the awning.

e. Projecting Signs and Under-Awning Signs**STANDARDS**

S148. Projecting signs and under-awning signs shall be limited to one per commercial tenant.

S149. Faces of multiple double-sided signs shall be perpendicular or parallel to the building front.

S150. Projecting signs and under-awning signs shall not project more than 4 feet beyond the property line and shall not encroach within 3 feet of a curb. If the awning or canopy would project into a public right-of-way, the Review Authority can make a determination as to whether an encroachment permit will be granted prior to project application.

GUIDELINES

G154. Projecting signs and under-awning signs are encouraged.

G155. Projecting signs should be mounted where they can be supported structurally, such as on piers or on walls above horizontal openings.



Awning Sign



Projecting Signs. Signs like this building façade mounted projecting sign are encouraged.



Under-Awning Sign

G156. Projecting signs should be horizontal and pedestrian-oriented in nature and should not extend vertically beyond the roofline (1 story buildings) or storefront cornice (multi-story buildings).

f. Marquee Signs

STANDARDS

S151. Marquee signs shall be limited to one per building and be limited to cinemas and live performance theaters.

GUIDELINES

G157. Animated and changeable message signs or marquee signs used for product advertisement should not be allowed.

G158. Marquee signs should not be counted toward the total sign area permitted, but their size should be determined by the Review Authority based on functional and aesthetic concerns.

g. Vertical Blade Signs

STANDARDS

S152. Vertical blade signs shall be limited to hotels, cinemas, and live theaters only, and shall be limited to one per building.

S153. Vertical blade signs should not extend below a cornice located just above the ground-floor and should not extend more than 10 feet above the roof line.

S154. Vertical blade signs shall not project more than 6 feet beyond the property line and shall not encroach within 3 feet of the curb.

Why is this so limited?



Marquee Signs. The Tower District Theater marquee sign is appropriate for its type of use.



Vertical Blade Sign

this would not be an allowed per the S152 standard?

GUIDELINES

G159. Vertical blade signs should not obscure upper-floor windows and should be mounted directly to a solid pier or pediment area between windows.

h. Roof Signs**STANDARDS**

S155. Roof signs shall comply with the following:

- a. There shall be no more than 1 roof sign per building;
- b. Maximum area of 300 square feet;
- c. Maximum height of 10 feet;
- d. No roof sign shall cover, wholly or partially, any wall opening; and
- e. Illuminated only by 1 of the following methods:
 - i. Externally with concealed flood lighting;
 - ii. Individual letters may be internally illuminated with exposed neon tubes or a similar light source, but shall not have a translucent panel, lens, or face; and
 - iii. Projecting light behind an opaque letter or emblem, which results in the appearance of ring of light like a halo around the unilluminated letter or emblem.

GUIDELINES

There are no roof sign guidelines.

6. ART**STANDARDS**

There are no standards expressly related to art.



Roof Signs. This roof sign exemplifies the architecture of this building.

GUIDELINES

G160. Development should contribute art and artistic elements where they can be seen from public sidewalks, such as within front yards, as site features like fencing, and as building features like entrances.

7. OUTDOOR DINING

a. Sidewalk Dining

STANDARDS

S156. Sidewalk dining within public rights-of-way shall be as required by Development Code Section 15-2744 Outdoor Dining and Patio Area.

S157. Outdoor dining areas within public rights-of-way shall not obstruct a continuous path of pedestrian travel that is at least 5 feet in width.

S158. An encroachment permit must be obtained from the Review Authority to establish sidewalk dining within public rights-of-way.

S159. Barriers surrounding outdoor dining areas are subject to approval and may be required by the Review Authority. Barriers shall be comprised of metal fencing and/or planter boxes, and shall not exceed 3 feet in height.

GUIDELINES

G161. Sidewalks may be used for dining areas by adjacent businesses provided there is sufficient width. Dining tables and chairs may be located either in the outer furniture area or inner



Sidewalk Dining: The sidewalk shown here places tables and chairs for dining in the appropriate locations, in both the inner and outer furniture area.

furniture area. No dining may take place in the central walkway area of the sidewalk.

G162. The central walkway area of the sidewalk should occupy at least 50 percent of the sidewalk width and should not be less than 5 feet wide. The central walkway should be free and clear of all objects.

G163. The outer furniture area should occupy no more than 40 percent of the sidewalk width, provided there is sufficient walkway area.

G164. The inner furniture area should occupy no more than 20 percent of the sidewalk width, provided there is sufficient walkway area. Sidewalks narrower than 8 feet should not have an inner furniture area.

b. Recessed Patios

STANDARDS

S160. Recessed patios shall be as required by Development Code Section 15-2744 Outdoor Dining and Patio Areas.

GUIDELINES

G165. Recessed patios are allowed but should only be used when sidewalk dining or rear patio dining is not possible.

G166. Recessed patios should not be more than 10 feet deep.

G167. A solid wall 3 to 4 feet in height should enclose recessed patios. Walls should be an extension of the building and made with the same materials.

More Photos and Examples



05

ARCHITECTURAL STYLE



ARCHITECTURAL STYLE

A. Purpose

Standards and guidelines in this chapter are intended to maintain the architectural character and integrity of the Tower District, its residential neighborhoods, and its commercial subdistricts. They promote the Tower District's unique "sense of place" and continuation. Sense of place has to do with the Tower District's origins as a streetcar suburb beginning in 1909, and at a time when people walked for at least part of each trip and the street-facing edge of development was pedestrian-oriented. People walked more, and they had to rely on streetcars for longer trips, and in response commercial shops clustered around streetcar stops where there was more convenience and foot traffic.

Architectural and construction practices at the time of original development also contribute to the Tower District's unique sense of place. Construction practices predated modern methods, such as the use of prefabricated building features like plywood and window assemblies. As an industry, construction had more handmade craft than more modern times, and consequently older construction comes with a more relatable "human scale."

As described in Chapter I, Introduction, the Tower District was platted and built as small subdivisions where a dozen or less homes were built as production homes by a single builder, or where custom homes could be built on a single lot. Commercial development was more neighborhood in scale, and public sidewalks were lined by pedestrian-oriented storefronts that promoted window shopping for people walking between their homes and the streetcar stop. The Tower District's identity as an entertainment destination for the city and region began to occur with the opening of the Tower Theater in 1939.

[More Photos and Examples](#)

The Tower District's sense of place also reflects stylistic expressions that predominated in the architecture of California during the 20th century. A consistent or thoughtfully mixed architectural style contributes to an understanding of the Tower District's history through a presentation of building type, form, and materials, implied by design. Architectural consistency also resulted in visual harmony, with buildings of similar form, scale, materials, and motif. Early 20th century buildings were generally climate responsive as well, such as by using overhanging eaves to shade windows and trellises to shade walkways.

Although the numbering of the Standards and Guidelines that follow may appear nonsequential it is sequential across the document and optimal for implementation.

[More Photos and Examples](#)

B. Architectural Style Consistency

1. ARCHITECTURAL STYLE STATEMENT

STANDARDS

S161. An Architectural Style Statement shall be submitted by the Applicant. It shall be prepared by the Applicant or by a license architect, certified historic preservation consultant, or certified urban planner designated by the Applicant. The Statement shall describe the intended architectural style of the building(s). The Statement shall describe the intended style and how it will be expressed. The entire Statement shall be not less than 200 words and accompanied by building elevations and additional graphics or photos at the Applicant's discretion. The Applicant can revise and resubmit the Architectural Style Statement at any point in the review process.

GUIDELINES

G168. The Applicant should consult and be consistent with professional sources that describe the architectural style that the Applicant intends. Sources include City of Fresno staff serving the City's Historic Preservation Commission, and books such as "Guide to American Houses: The Definitive Guide to Identifying and Understanding America's Domestic Architecture" and "The Buildings of Main Street: A Guide to American Commercial Architecture."

G169. Preparation of the Architectural Style Statement should be used as an opportunity to reflect on, research, and refine the project's expression of architectural style. The Applicant should receive City staff feedback after required presentations and should consider design adjustments based on feedback.

G170. The architectural style of new buildings should complement the style of a neighboring building, within a few parcels on the same side of the street or across the street from the project.

G171. Additions and alternations to structures constructed before 1960 should derive from the same style as the original structure. The style of the original structure may be determined by consulting with the Planning and Development Department, the Historic Preservation Commission, or a qualified historic preservation consultant.

More Photos and Examples

2. GENERAL

GUIDELINES

G172. New buildings should fit into their surroundings. This does not mean that the existing buildings must be copied, but that the context of any new building should be respected. Attempts should be made to connect the architectural style of the new building to that of its neighbors.

G173. New buildings are encouraged to use a historical style, as are described in this section, and interpret the style accurately per the guidance of City of Fresno's staff serving its Historic Preservation Commission.

G174. Design within a selected style should give special attention to materials, proportions, architectural elements, facade composition, and ornamentation to avoid a cartoonish or fake appearance. At the same time, it is not the intention of this document to fully dictate the architectural style of individual buildings. Creativity is encouraged, as good architecture is critical to the creation of a beloved neighborhood with architectural diversity.

G175. Renovations and additions to existing buildings should follow the original style. For example, Victorian gingerbread should not be added to an Art Deco building, nor should a Tudor structure be remodeled to be Moderne.

[More Photos and Examples](#)

3. NEO-CLASSICAL

Neo-Classical is an umbrella term that includes a variety of styles deriving from Greco-Roman classical architecture, including Colonial Revival, Georgian, Greek Revival, Italianate,

and Classical Revival. Neo-Classical styles are generally characterized by a tripartite vertical organization of building base, middle, and top, and horizontal composition of elements that are regularly spaced. Many Neo-Classical buildings make references to the architecture of ancient Greece and Rome, such as with the use of columns beneath pitched roofs and pediments.

STANDARDS

S162. Cladding Materials. Additions or alterations to existing Neo-Classical structures shall match the original cladding materials and finishes. For new structures, cladding shall consist of brick, clapboard, or stucco. Stucco finishes shall be smooth or lightly textured types such as Santa Barbara, Fine Float, Fine Sand, or Medium Sand. Modern deeply textured stucco finishes such as Knockdown Dash, Lace, or Arizona are not permitted. Stacked stone and simulated stone shall only occur where its bottom edge is at finished grade and shall not be placed above any other material.

S163. Roofing Materials. Additions or alterations to existing Neo-Classical structures shall use roof materials that match the original roofing materials. For new structures, roofs shall consist of wood shake shingles (real or simulated), ribbed tin, or standing-seam metal. For existing and new structures, composite shingles shall be an acceptable substitution for wood shake shingles.

S164. Preservation and Restoration. Classical columns, porticos, ornamented cornices, balustrades, shall not be removed from an existing structure or shall be restored to their original appearance.



Neo-Classical Example. Neo-classical facades commonly use columns, triangular pediments (the ends of gabled roofs), and symmetrical arrangements.

Better example?

More Photos and Examples

GUIDELINES

G176. Tripartite Composition. New buildings using Neo-Classical styles should use a tripartite vertical organization of building base, middle, and top. A horizontal belt course or cornice, change in material, or material change in plane should accentuate the boundaries between base, middle, and top. Locate a horizontal belt cornice to define a building's base by locating it at or near the level of the first floor.

G177. Roof Form. Buildings in neo-Classical styles should use hipped and gabled roofs that are accompanied by eaves not less than 18 inches deep. Flat roofs are acceptable for buildings that are 3 or more stories and should be accompanied by a parapet wall along the roof perimeter.

G178. Building Silhouette. Accentuate the top edge of a building's facade and silhouette with one or more of the following:

- i. Deep eave supported by rafter tails or bracing;
- ii. Projecting cornice;
- iii. Pediment gable ends; or
- iv. Dormers that break the roofline.

G179. Facade Composition. Where possible, evenly space and/or create symmetrical arrangements of windows, columns, pediments, and other architectural elements.

G180. Entrances. Building entrances of Neo-Classical buildings should be accentuated by large porches or articulated vestibules, which may be shared by adjacent dwellings.

G181. Neo-Classical Features. New neo-classical buildings

[More Photos and Examples](#)

should incorporate columns and colonnades, pedimented doors and gables, classical columns, porticos, ornamented cornices, and/or balustrades. The triangular end of gabled roofs is a common feature of neo-classical facades.

4. MEDITERRANEAN

Mediterranean is an umbrella term that includes Italian Renaissance, Mission, Spanish Eclectic, and Monterey, and influenced by vernacular architecture of Spain, Portugal, Italy, and southern France. Mediterranean style has features that respond to the arid and often hot climate of these places, such as deep openings and eaves for shade, and adobe or masonry walls for the cooling effect of thermal mass.

STANDARDS

S165. Cladding Materials. Additions or alterations to existing Mediterranean structures shall have cladding materials and finishes that match the original cladding materials and finishes. For new structures, cladding shall consist of stucco. Stucco finishes shall be smooth or lightly textured types such as Santa Barbara, Fine Float, Fine Sand, or Medium Sand. Modern heavily textured stucco finishes such as Knockdown Dash, Lace, or Arizona shall not be used. Stacked stone and simulated stone shall only occur where its bottom edge is at finished grade and shall not be placed above any other material.

S166. Roofing Materials. Additions or alterations to existing Mediterranean structures shall use roofing materials that match the original roofing materials. For new structures, roofs shall consist of red ceramic tiles such as straight barrel mission tile,



Mediterranean Facade Example. Mediterranean facades commonly use stucco in a wall that is generally in the same plane. Tile roofs are often used throughout or in front of a parapet wall, as shown.

tapered mission tile, Spanish tile, or American Spanish tile.

S167. Preservation and Restoration. Columns, porticos, ornamented cornices, balustrades, quatrefoil windows, shaped parapets, and arched entry porches shall not be removed from an existing structure or shall be restored to their original appearance.

GUIDELINES

G182. Continuous Facade Plane. The facade composition of Mediterranean-styled buildings should emphasize a wide expanse of cladding material in a single plane, which is interrupted by subtractive elements (like deeply recessed windows, loggias and passages), and additive elements (like bay windows, balconies, and eaves).

G183. Entrances and Windows. New Mediterranean buildings should incorporate quatrefoil windows, shaped parapets, arched entry porches, and/or recessed entry vestibules. Entrance and window openings are usually free from trim in Mediterranean buildings. Columns frequently frame entrances.

G184. Roof Form. Shallow sloped hipped and shed roofs are preferred and should be accompanied by deep eaves. Flat roofs with parapets are appropriate for buildings that are 3 or more stories. Above the principal facade, the roof shall slope towards that street. Gable ends shall not be part of the front facing facade.

[More Photos and Examples](#)

5. TUDOR

Tudor is an umbrella term that includes Tudor and Norman revivals, which are derived from medieval vernacular architecture of England, France, Scandinavia, and Germany. Tudor style has features that reflect a building's response to the wet and often cold climate of these places such as roofs that slope steeply to shed snow. The half-timbered facade is another characteristic of the Tudor style and consists of exterior walls constructed with a timber frame, and the spaces between the timbers are filled with other materials like brick, plaster, or stone. Buildings in the Tudor and Norman Revival styles also play with architectural elements associated with northern Europe in medieval times, such as decorative shields and towers.

STANDARDS

S168. Cladding Materials. Additions or alterations to existing Tudor structures should match the original cladding materials and finishes. For new structures, cladding shall consist of wood boards and stucco. Simulated versions of these materials are allowed. For new construction, stucco finishes shall be smooth or lightly textured types, such as Santa Barbara, Fine Float, Fine Sand, or Medium Sand. Modern stucco finishes such as Knockdown Dash, Lace, or Arizona shall not be used. Stacked stone and simulated stone shall only occur where its bottom edge is at finished grade and shall not be placed above any other material.

S169. Roofing Materials. Additions or alterations to existing Tudor structures shall use roof materials that match the original roofing materials. For new structures, roofs shall consist of wood shake shingle or slate (real or simulated), or composite



Tudor Example. Tudor architecture generally uses half-timbered facades (exterior plaster between boards) and relatively steep gabled roofs with end gables facing the street. Allusions are sometime made to medieval architecture, such as the tower and turret that is shown.

[More Photos and Examples](#)

shingles.

S170. Other Features. Half-timbering, multiple front gables, multi-level eaves, turrets and rounded entryways shall not be removed from existing structures or shall be restored to their original condition.

GUIDELINES

G185. Massing and Roof Form. The primary facade composition of Tudor style buildings should be of a dominant building mass accompanied by a tall projecting bay and steep roofs. Large windows often face the street.

G186. Facade Treatments. Tudor style buildings should incorporate half-timber exterior wall construction along with multiple front gables, multi-level eaves, turrets and/or rounded entryways. In Tudor style buildings, trim should surround the window and door openings.

6. CRAFTSMAN

Craftsman is an umbrella term that includes a variety of styles relating to the Arts and Crafts movement of the early 20th Century. Craftsman generally have a tripartite vertical organization accentuating a building's base, middle, and top. Windows with vertical proportions (taller than they are wide) are generally grouped compositionally. Principal attributes of craftsman buildings include low-pitched roofs and deep eaves, front porches, decorative-yet-simple woodwork, and natural materials like wood, stone, and brick.

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Craftsman Example. Craftsman architecture usually uses simple building forms with wood cladding. Generous porches and dormer windows are common. Windows are often grouped within a window opening.

STANDARDS

S171. Cladding Materials. Additions or alterations to existing Craftsman structures shall have cladding materials that match the original cladding materials and finishes. For new structures, cladding shall consist of clapboard, split wood shingles, cementitious shingles, and stone. Simulated versions of these materials are allowed. Stacked stone and simulated stone shall only occur where its bottom edge is at finished grade and shall not be placed above any other material.

S172. Roofing Materials. Additions or alterations to existing Craftsman structures shall use roofing materials that match the original roofing materials. For new structures, roofs shall consist of wood shake shingles (real or simulated), or composite shingles.

S173. Other Features. Wide eaves, exposed rafters, decorative brackets, large front porches supported by tapered columns.

GUIDELINES

G187. Tripartite Composition. Buildings in the Craftsman style should have a tripartite vertical organization accentuating a building's base, middle, and top. A horizontal belt course, sill course, or other material change in plane should accentuate the boundaries between base, middle, and top.

G188. Windows and Trim. Craftsman buildings should have windows of vertical proportion individually, and vertically-proportioned individual windows should be grouped to form wider openings. Window openings are commonly surrounded by trim. Arched windows are rarely used in Craftsman buildings.

G189. Roof Form. Craftsman buildings should have low-to-

More Photos and Examples

Should there be anything to cover an 'Cottage style' for all the non craftsman homes?

medium pitched roofs and deep eaves supported by rafter tails and/or cutout brackets.

G190. Entrances. Craftsman buildings should have generous front porches with roofs supported by substantial columns.

7. PRAIRIE STYLE

The Prairie style derived from the early 20th-century Prairie School movement. The Prairie style share attributes with the Craftsman style, but with emphasis on horizontal lines, low-pitched roofs with especially broad eaves, and integration of natural landscape elements such as to use stone at their base.

STANDARDS

S174. Cladding Materials. Additions or alterations to existing Prairie structures shall have cladding materials that match the original cladding materials and finishes. For new structures, cladding shall consist of stucco. Stucco finishes shall be smooth or lightly textured types such as Santa Barbara, Fine Float, Fine Sand, or Medium Sand. Modern heavily-textured stucco finishes such as Knockdown Dash, Lace, or Arizona shall not be used. Stacked stone and simulated stone shall not be used in additions, alterations, and new construction using the Prairie Style.

S175. Roofing Materials. Additions or alterations to existing Prairie structures shall use roofing materials that match the original roofing materials to the extent feasible. For new structures, roofs shall consist of clay tiles or wood shake shingles. For existing and new structures, composite shingles shall be an acceptable substitution for wood shake shingles.



Prairie Style Example. Prairie style buildings have strong horizontal elements through the use of deep eaves and combine features near the top of the facade, such by locating a belt course just below top-floor windows. Windows are often grouped compositionally.

[More Photos and Examples](#)

S176. Other Features. Wide eave overhangs that are boxed without brackets, low pitched roofs, geometric patterns of small pane window glazing, and tall casement windows shall not be removed from existing structures or shall be restored to their original condition.

GUIDELINES

G191. Tripartite Presentation. Buildings in the Prairie School style should have a tripartite vertical organization accentuating a building's base, middle, and top. A shallow horizontal belt cornice, sill course, or other material change in plane should accentuate the boundaries between base, middle, and top.

G192. Windows and Trim. Prairie Style buildings should have windows of vertical proportion individually, and vertically-proportioned individual windows should be grouped to form wider openings. Window mullions that make geometric patterns are encouraged. Arched windows are rarely used in Prairie style buildings. Casement windows are preferred.

G193. Roof Form. Prairie Style buildings should have low-pitched roofs and deep cantilevered eaves.

G194. Entrances. Prairie Style buildings should have generous front porches with roofs supported by substantial columns.

8. ART DECO

Art Deco was popular in America's urban centers in the early 20th-century. It conveys a modern and aspirational sense by emphasizing vertical expression and lines that extend beyond the main form, such as the Tower Theatre's vertical tower

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Art Deco Example. Art deco architecture features bold use of continuous lines, such as common use of vertical pilasters that extend from the ground to beyond the top edge of the building. Often, continuous horizontal lines are created with long canopy over windows and decorative materials along the base of the building.

Not clearly 'Art Deco' ?

marquee and pilasters that reach beyond the top edge of parapets. Art Deco ornament is characterized by geometric shapes. In the Tower District, Art Deco applies to Mixed-Use and Commercial districts and buildings that are 3 stories or taller in Multi-family Residential districts.

STANDARDS

S177. Cladding Materials. Additions or alterations to existing Art Deco structures shall have cladding materials that match the original cladding materials and finishes. For new structures, cladding shall consist of terra cotta tile, glazed brick, stainless steel, glass block, and stucco. Stucco may be used for not more than 50 percent of the ground-floor facade area excluding windows. Stucco finishes shall be smooth.

GUIDELINES

G195. Vertical Expression. Art Deco buildings commonly use tall, narrow windows, pilasters, and spires to draw the eye upward. At the top of buildings, vertical pilasters often push beyond the top edge of parapets.

G196. Continuous Horizontals. Art Deco buildings usually reserve horizontal lines for continuous features, creating a streamlined counterpoint to an otherwise vertical facade. An Art Deco building should incorporate a continuous horizontal feature such as a canopy above a sidewalk or above a large grouping of windows.

G197. Strong Rhythms and Shadow Lines. Art Deco buildings should have a regular rhythm of bays and pilasters which create strong vertical shadows. Trim rarely surrounds window and entrance openings within Art Deco buildings.

What about a general 'modern' style?

More Photos and Examples

G198. Ornate Entrances. Compose building entrances to be flanked by ornate and symmetrical features.

G199. Geometric Patterns. Incorporate geometric patterns such as zigzags, chevrons, sunbursts, and stepped forms along entablatures, within panels, or as surface decoration. Geometric patterns are also common within metalwork for balcony railings, spandrels, and light fixtures.

06

GLOSSARY

GLOSSARY

See also Development Code Section 15-6802, Definitions. Terms defined in Section 15-6802 are indicated by an asterisk (*) below.

Accessory Dwelling Unit. A smaller self-contained residential unit located on the same parcel as a principal residential building.

Accessory Structure.*

Active Fronts. Ground-level building frontages with frequent doors, windows, and uses (like shops or cafés) that encourage pedestrian interaction.

Addition. An expansion to an existing building that increases its floor area or footprint.

Alley.*

Apartment House Overlay (AHO). A zoning tool that permits apartment buildings in zoning districts where they might not otherwise be allowed. See Development Code Section 15-1609, Apartment House Overlay District.

Appearance. The characteristics of a building or features that are visible and not concealed.

Architectural Compatibility. The degree to which a building's design harmonizes with other parts of the same building and/or harmonizes with its surroundings, such as through massing, materials, or composition.

Architectural Diversity. Variation in building styles, forms, and materials within a neighborhood or development.

Art. Artwork used as a placemaking or decorative element in the built environment.

Art Deco. A design style from the early 20th century characterized by geometric shapes, streamlined forms, and ornamental detailing.

Arts and Crafts. An architectural and design movement emphasizing handcraftsmanship, natural materials, and simplicity.

Awning.*

Awning, Retractable. A type of awning that can be extended or retracted, mechanically or manually, to adjust the extent of shade.

Balcony.*

Balcony, Juliet. A shallow balcony in front of a window or door, which may be deep enough to stand but not for dining.

Bay, Commercial. A horizontal section along the ground-floor of a commercial building, usually defined by structural bays or storefront divisions.

Bay Window.*

Block. A section of land bounded by streets on all sides, typically the basic unit of urban layout.

Block Face. One side of a block, usually comprised of front yards and building fronts that face a particular street.

Block Length. The linear distance between two intersections along one side of a block, and an important factor in walkability and connectivity.

Block, Cinder. A type of concrete block made with cinder aggregate.

Block, Concrete. A solid or hollow rectangular masonry unit made from concrete, used in structural and non-structural walls.

Buffering.*

Building Envelope.*

Building Footprint.*

Building Height.*

Building Site.*

Building, Existing. A structure that is already constructed on a site, as opposed to proposed or planned future buildings.

Building, Mixed-Use. A structure that contains multiple uses within the same building or complex, which often contains shops on the ground-floor with residential or office uses above.

Building, Original. The first structure built on a site before any additions, remodels, or demolitions, which may be historic.

Building, Primary. The largest and principal structure(s) on a lot, as distinguished from accessory or secondary buildings.

Building, Principal.*

Canopy.*

Canopy, Rigid. A canopy made of durable rigid material, including wood, plywood, metal, glass, or other durable materials, and not cloth.

Carport.*

Certainty Option. A planning or permitting pathway that allows streamlined approval free from discretionary review for projects that meet specific predefined standards, as provided for by Development Code Section 15-4906, Council District Project Review Committees.

Civic. Relating to public life, spaces, or buildings—often used to describe facilities like libraries, city halls, or parks.

Civic Nature. The quality or character of a space or structure that supports public gathering, engagement, or community identity.

Civic Use. A land use category for public or community-oriented functions, such as schools, museums, post offices, and government buildings, and defined as Public and Semi-Public Use Classifications in Development Code Section 15-6703.

Cladding. The exterior material layer applied to a building's structure for aesthetic and/or protective purposes.

Cladding, Pressed Plywood. A type of plywood cladding with grooves or other indentations to create texture.

Cladding, Reverse Board and Batten. A siding style where wide boards are separated by shallow and narrow gaps with a backing that was traditionally provided by narrow boards or batten.

Cladding, Rough Sawn. A cladding material that retains a textured, unfinished look, mimicking the appearance of freshly cut lumber for a rustic effect.

Clear Dimension. The unobstructed width or height of a space, often to provide sufficient space for circulation and/or other activity.

Clear Glazing. Transparent glass that allows full visibility and natural light, without regard to light transmission outside of the visible spectrum, and in contrast with obscured or tinted glazing.

Cobrahead. A common streetlight fixture shaped like a vertical pole with a cantilevered horizontal arm used to support a light fixture.

Columns. Vertical structural or decorative elements that support roofs or entablatures, or frame entries and porches.

Commercial. Refers to land uses or activities related to commerce, such as retail, offices, or services.

Commercial Space. Interior space designated for commercial uses—such as shops, restaurants, or offices—usually on the ground-floor of mixed-use buildings.

Commercial Use. Any activity involving the sale of goods or services, including retail, hospitality, and office functions, and defined as Commercial Use Classifications in Development Code Section 15-6704.

Commercial, Ground-Floor. Commercial space located at the street level of a building, often required in walkable or mixed-use zones to activate the sidewalk.

Community Use. A land use that serves the public or a local population, including community centers, libraries, and places of worship.

Compatibility. The degree to which different buildings or land uses can coexist harmoniously based on form, scale, materials, and function.

Context. The surrounding built and natural environment that influences a building's design or planning approach.

Contextual. Designed or planned in response to the surrounding environment or neighborhood, often respecting local patterns, materials, and scale.

Cornice. A decorative horizontal molding that crowns a building or architectural element, typically found at the roofline or over a door/window.

Corrosion Resistant. The quality of a material (often metal) to withstand deterioration from weather, chemicals, or pollutants.

Courtyard.*

Decorative. Design elements used for aesthetic purposes, not structural or functional.

Decorative Accent. A specific ornamental feature, such as trim, tilework, or paneling, used to enhance visual interest.

Degrees. A unit of measurement for angles, such as to describe a slope (e.g., roof pitch, stair angle, orientation of walls).

Differentiated. Distinctly different, such as to distinguish two design features or two different sections of the same element.

Dining, Outdoor. Seating and eating areas located outside, typically on sidewalks, patios, or courtyards, often associated with restaurants or cafés.

Door. A movable barrier that allows entry or exit into a building or room.

Door Frame. The structural support that surrounds and secures a door, including the jamb, head, and threshold.

Driveway.*

Driveway, Ribbon. A type of driveway with two parallel paved strips separated by a center of grass or other groundcover, such that the width of the paved strips and their spacing will lay below the tires of common motor vehicles.

Dwelling Unit.*

Enclosed.

Element. A distinct component of a building's design, such as a column, window, or awning.

Entrance. The point of access to a building, typically including the door, steps, and architectural framing.

Entrance Vestibule. A small, enclosed space between the outer door and the interior of a building, used to reduce drafts and improve thermal efficiency.

Entrance, Common. A shared building entrance used by multiple dwelling units or tenants.

Entrance, Direct. An individual, private access point from the exterior into a dwelling or unit, as opposed to shared corridors or lobbies.

Entrance, Primary. The main point of entry into a building, often emphasized architecturally and oriented toward the street.

Equipment, Ground-Mounted. Mechanical motors, switches, or similar features installed directly on the ground rather than attached to a building, inclusive of panels and boxes used to conceal such equipment.

Equipment, Roof-Mounted. Refers to apparatus and features, such as solar panels, HVAC units, or signage, that are installed on top of or on a platform just below a building's roof surface.

Façade.*

Facade Area. The total surface area of all facades facing a front or street side setback, often used in calculating window percentages or signage allowances.

Facade Articulation. Architectural detailing and variation (such as projections, recesses, materials) that adds interest and

breaks up large wall surfaces.

Facade Plane. The largest single flat surface along the front of a building, which does not include building projections or recesses.

Facade, Neighboring Adjacent. The façade of a building located directly on the property next to a given structure, relevant for contextual compatibility.

Facade, Primary. The most prominent building face, which typically faces a front property line or, for buildings interior to a property, faces a shared walkway or common open space.

Facade, Street-Facing. The side of a building that faces a front or street side property line and is not separated from that property line by another building.

Fastener. A hardware device (such as a nail, screw, or bolt) used to attach or secure building materials together.

Feature. A distinct architectural or landscape element that contributes to the character, function, or visual interest of a place or structure (e.g., cornices, balconies, fountains).

Front. The portion of a building that faces a front property line or, for buildings interior to a property, faces a shared walkway or common open space.

Frontage, Building. The length of a building that directly faces a street or open space.

Frontage, Street. The length of public and semi-public space between a street's curb and the buildings that face it, and often comprised of a sidewalk, planting strip, and front yard.

Garage. A structure for storing vehicles, which may be attached to or detached from a primary building.

Glass, Mirrored. Reflective glass that has a metallic coating to create a mirror-like surface; often used for privacy or aesthetics.

Glass, Obscured. Glass that has been frosted, etched, or textured to prevent visibility while still allowing light to pass through.

Grade. The level of the ground at a particular location, especially around a building or site.

Grade, Finished. The final ground-level of a site after construction.

Ground Floor. The lowest floor of a building other than a basement that is closest to finished grade, and the habitable space associated with that floor.

Ground-Floor (Ground-Level and Street-Level also used). An adjective connoting attributes associated with ground floors.

Ground-Floor Commercial Space. A ground-floor designated for commercial uses like retail or food service, or as may be permitted to maintain an active street environment.

Guideline. Guidelines describe a preferred design approach that is subject to interpretation by the approval authority as part of the development project review.

Historic. A designated building, site, or district that has been determined by the significance due to age, architecture, or cultural value, often subject to preservation standards.

Hitching Post. A short, sturdy post historically used to tie horses.

Human in Scale. Building features and other design features of a size similar to that of a person, which helps make these more relatable and comfortable to be next to.

Landscape Strip. A narrow area, typically between the sidewalk and curb, typically planted with trees and landscape to enhance a streetscape.

Landscaped Area. Portions of a site improved with plantings, mulch, or decorative features as opposed to paved or built surfaces.

Lighting Fixture.*

Loading Area. A designated space where goods are loaded and unloaded from delivery vehicles, often located at the rear or side of a building.

Lot, Corner. A parcel of land situated at the intersection of two or more streets, and with two street frontages.

Lot, Interior. A lot that is bounded by other lots on both sides, away from a street corner, and typically with only one street frontage.

Materials, Existing. The building materials that are currently present on a structure or site, which may influence design decisions during renovations or additions.

Materials, Original. The materials used in the initial construction of a building, often significant in historic preservation and restoration work.

Mechanical Lifts. A dynamic structural frame and machinery used to vertically move vehicles or objects, often employed in parking garages to increase their capacity.

Metal Fastener. Metal hardware used to join materials or other building components together, such as screws, bolts, nails, or clips used.

Metal Panel. A flat sheet of metal used as siding, roofing, or cladding material, often offering a modern, industrial appearance.

Metal Piece. A generic term for a part or component made of metal, used in various structural or decorative applications.

Ministerial Review. Development project review that can be performed by an administrator using objective criteria, which requires no discretionary interpretation or judgment.

Missing Middle Housing. A range of small multi-family or clustered housing types that are of a scale similar to large single-family homes (such as duplexes, fourplexes, and courtyard apartments), while offering higher residential densities.

Mixed Uses. A set of land uses that are dissimilar and combined.

Monument, Gateway. A prominent architectural or landscape feature erected to mark the entrance to a district, neighborhood, or significant location.

Muntins. Wooden or metal bars that hold small panes of glass in place within a window to create a grid of two or more panes.

Neighborhood. A localized area within a city or town, often defined by having a walkable range and common characteristics like building types, commonly enjoyed amenities, or community identity.

Neighborhood Compatibility. The degree to which a new development or modifications fits within the existing physical and social context of a neighborhood.

Neo-Classical. An architectural style inspired by classical Greek and Roman forms, often featuring columns, symmetry,

and formal proportions.

Neo-Spanish. An architectural style that draws from traditional Spanish and Mission-style architecture, characterized by stucco walls, clay tile roofs, and arched openings.

Open Space. Any area of land or water that is left undeveloped or minimally developed for recreation, landscaping, or environmental preservation.

Open Space, Common.*

Open Space, On-Site. Outdoor open areas located on the same development site, intended for use by its occupants or the public.

Open Space, Private.*

Ornamentation. Architectural details or decorative elements added to a structure to enhance its aesthetic appeal (e.g., moldings, carvings, tilework).

Overlay District.*

Palette. A selection of colors, materials, or textures used in architectural or landscape design to create a cohesive visual character.

Panel. A flat, typically rectangular piece of material used in construction, often as cladding, siding, or decorative surface treatment.

Parapet.*

Parking. Space provided for vehicle storage, either on the street or on a private lot or structure.

Parking, Tandem. A parking arrangement where one car is parked behind another in a single file, requiring the front vehicle to be moved for the rear one to exit.

Parking, Underground. A parking facility located below the ground-level of a building, often used in dense urban areas to optimize development above grade.

Paseo. A pedestrian passage flanked by landscaping that provides an internal walking connection to adjacent parcels,

sidewalks, walkways, or other paseos. Paseos are not accompanied by space for motor vehicles.

Passage. A narrow, often covered, route through or between buildings, providing pedestrian access.

Pedestrian Access, Direct. A clearly defined, convenient path for people to enter a building or site directly from a sidewalk or public right-of-way.

Pedestrian Oriented. A design approach that prioritizes the comfort, safety, and visual interest of people on foot, often involving features like active frontages, lighting, and sidewalk amenities.

Pilaster. A shallow rectangular feature projecting from a wall, having a capital and a base and architecturally treated as a column.

Placemaking. A type of design and planning that focuses on how people perceive and use their surrounding environment so that public spaces support the well-being of individuals and communities, such as to encourage positive forms of social interaction.

Plane. A flat or level surface in architecture; often used in discussing building façades or spatial organization.

Plaza.*

Podium.*

Porch. An outside landing immediately adjacent to a building entrance and sheltered by a roof.

Porte Cochere.*

Prairie Style. An architectural style developed in the early 20th century, characterized by horizontal lines, flat or hipped roofs with broad overhangs, and integration with the landscape.

Primary. Referring to the main or most significant component in a system, such as a building's main structure, entry, or frontage.

Projection. A feature that protrudes in front of a building volume or principal facade plane.

Prominent. Visibly significant or emphasized in design, often attracting attention due to size, location, or detail.

Proportion. The relation of one part to another or to the whole with respect to scale, quantity, or arrangement.

Railing. A barrier or guard, often made of metal or wood, used along staircases, balconies, porches, or ramps for safety

and guidance.

Recess. A volume that recedes from a building volume or principal facade plane, such as an open vestibule or decorative niche.

Recessed. Set back or sunken in from the surrounding surface, commonly describing architectural elements like lighting, entries, or windows.

Renovation. The process of improving, updating, or restoring an existing building or space, and without major demolition.

Roadway. The portion of a street intended for vehicle travel, excluding sidewalks, curbs, landscape strips, and medians.

Roof.*

Roof, Flat. A horizontal or nearly horizontal roof with less than 1:12 slope, often used on modern or commercial buildings.

Roof, Gabled. A pitched roof with two sloping sides that meet at a ridge, forming a triangular wall section at each end.

Roof, Hipped. A roof where all sides slope downward to the walls, typically with a gentle pitch and no vertical walls at the end of the roof volume.

Screening.*

Security Bars. Metal bars installed over windows or doors to prevent unauthorized entry.

Security Doors, Roll-Down. Metal or mesh doors that roll down from above, where they may be concealed by a cabinet, to secure storefronts or entrances, typically used after business hours.

Setback, Front.*

Setback, Interior.*

Setback, Rear.*

Setback, Street Side.*

Sidewalk. A paved path intended for pedestrian use, which may or may not be on public property.

Sidewalk, Public. A sidewalk located within the public right-of-way, maintained by the city or another public agency and accessible to all.

Siding. The exterior cladding of a building, typically used for weatherproofing and aesthetics.

Siding, Bevel. A type of wood siding composed of overlapping boards that are tapered at their edge, creating a shadow line.

Siding, Bungalow. A traditional siding style often used on Craftsman or bungalow homes, typically wood, with wide exposure and horizontal emphasis.

Siding, Dolly Varden. A style of siding similar to bevel but with a flat back and a rabbeted (notched) lower edge to fit snugly with adjacent boards.

Siding, Drop. Horizontal siding boards that interlock with each other via a groove or tongue, producing a smooth and weather-resistant surface.

Siding, Metal. Siding panels made from aluminum, steel, or other metals, known for durability and a modern or industrial look.

Siding, Tongue & Groove. Boards designed to fit together with an extension (tongue) on one edge and a recess (groove) on the other, which interlock.

Siding, Vinyl. A plastic-based siding material that mimics wood and is widely used for its affordability and low maintenance requirements.

Sign. Any graphic display, structure, or device intended to attract attention or convey information, typically related to business identification or advertising.

Spandrel. A panel between the top of one window and the bottom of the window above it, used for decorative purposes in multi-story buildings.

Stairway, External. A stair structure located outside the building envelope, often used for secondary egress or access to upper units.

Standard. A rule or specification that is mandated. In this document, all standards are considered objective standards. See definition of Standard, Objective.

Standard, Objective. A standard that involves no subjective interpretation and can be consistently determined by any party.

Stoop. The landing at the entrance of a building, which is sheltered by a canopy and accompanied by stairs.

Storage Area. A designated space used to store equipment, supplies, or personal belongings, which may be indoors or outdoors.

Storefront. The ground-floor façade and interior space, which has design characteristics that can accommodate – but may not necessarily be used as -- a commercial shop, and typically infills a commercial bay with large windows, frequent entrances, awnings, and signage.

Streamlining. The process of reducing or simplifying development review steps to reduce the steps necessary for development project approvals.

Streamlining Law. Legislation intended to accelerate the review and approval of development projects by limiting discretion and emphasizing objective standards.

Street. A public or private roadway that provides access to buildings and lots; typically includes sidewalks, curbs, and travel lanes.

Street Connectivity. The degree to which a street network allows direct travel between destinations along multiple alternative routes of similar distance, with greater connectivity associated with shorter block lengths and a higher density of street intersections.

Street Side. The side of a corner lot that faces a street but is not considered the front of the property.

Streetwall. A perceived vertical plane comprised of a facade or series of facades that faces a street and appears to enclose the street spatially.

Stucco. A plaster-like exterior wall finish made from cement, sand, and lime; common in Mediterranean, Spanish, and Southwestern architectural styles.

Style. The distinct design characteristics of a building, often associated with a historical period or architectural movement.

Suburban. A development pattern characterized in a generalized way by lower density, separation of individual land uses, and automobile-oriented design.

Surface Relief. Variations in the depth or texture of a building's surface, used to add visual interest or articulation (e.g., reveals, grooves, patterns).

Tower District. A culturally significant and architecturally diverse neighborhood in Fresno, California, known for its walkability, mixed of uses, and historic character with specific boundaries as stipulated in the Tower District Specific Plan.

Traditional. A design approach based on historical architectural styles or vernacular forms, often incorporating symmetry, familiar materials, and ornamental detail.

Trash Enclosures. Structures that house garbage bins or dumpsters, typically screened from view with walls or fencing for visual and environmental reasons.

Tudor. An architectural style inspired by late Medieval English design, characterized by steeply pitched roofs, decorative half-timbering, and tall, narrow windows.

Upper Floor. Any floor and associated space above the ground floor of a building, typically used for residential or office uses in mixed-use structures.

Upper-Floor (Upper-Level also used). An adjective connoting attributes associated with upper floors.

Urban. Relating to a dense, city-like environment with a mix of uses, walkable streets, and structured open space.

Victorian. A broad architectural style from the late 19th century, known for its ornate detailing, asymmetry, steep roofs, and varied textures and colors.

Walkway. A path designated for pedestrian movement, which may be paved or landscaped and located within a site or development.

Walkway, Raised. A pedestrian path elevated above the surrounding ground or surface level, often used for accessibility, safety, or stormwater management.

Wall. A vertical structure that defines or encloses space, provides structural support, or separates interior and exterior areas.

Wall Opening. Any aperture or break in a wall, such as a window, door, or vent, allowing light, air, or passage.

Wall, Curtain. A non-load-bearing exterior wall attached to a structural frame, often made of glass or lightweight panels.

Wall, Solid. A continuous wall without openings or glazing, typically used for privacy, screening, or security.

Window. A glazed opening in a wall that allows light and views and may provide ventilation when operable.

Window Frame. The fixed perimeter structure that holds the window sash or glass in place; typically made of wood, aluminum, vinyl, or fiberglass.

Window Opening. Any aperture or break in a wall, in which there can be one or more window frames.

Window Trim. The molding or framing that surrounds a window, often used for decorative and weather-sealing purposes.

Window, Casement. A window with one or more sashes that swing outward or inward on side hinges, typically operated with a crank.

Window, Double Hung. A window with two vertically sliding sashes that move independently, allowing ventilation from the top, bottom, or both.

Window, Reflective. Glass treated with a reflective coating to reduce solar heat gain and provide visual privacy by reflecting light.

Window, Single-Hung. A window with a fixed upper sash and a lower sash that slides vertically for ventilation.

Window, Tinted. Glass that has been darkened or colored to reduce glare, heat gain, or improve privacy while still allowing light transmission.

Window, Transom. A horizontal window located above a door or another window, often used for ventilation or decorative effect.

TOWER DISTRICT DESIGN STANDARDS & GUIDELINES

ACKNOWLEDGMENTS OPTIONAL.

Credits and acknowledgments should definitely be added to recognize everyone's hard work on this!!

LETTER 13
South Tower Community Land Trust



9/29/2025

Attn: Sophia Pagoulatos, Planning Manager
Planning and Development Department
City of Fresno
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Fresno, CA 93721
longrangeplanning@fresno.gov

Comments in response to Draft Tower District Specific Plan

We appreciate this opportunity to review the draft Tower District Specific Plan Update. We are providing this formal letter to aggregate our feedback and suggest significant alteration to more fully document the history and current reality in the Tower District as well as to chart a more equitable future for our neighborhood.

First it is important for us to frame what perspective this letter comes from.

Leading this organization is our founding executive director, Kiel Lopez-Schmidt. They have a diverse experience in architecture, affordable housing development, community development finance. This has included leading numerous projects in the Tower District such as:

1. banquet hall adaptive reuse of the former Turpin's Furniture at 1028 N Fulton St
2. architecture & sign design of affordable housing development, 541 @ South Tower
3. food truck commissary in former restaurant at 504 E. Belmont Ave
4. Nomination of the JR Turner Home at 815 E. Dudley Ave. to Local Historic Registry
5. Served 10 years on the Tower District Design Review Committee.
6. Design and manufacturer coordination of Tower Bike Racks
7. Conditional Use Permit for Goldstein's
8. Facade improvement design for Color Me Chula and En Las Nubes
9. Coordination of 4 public art murals in the neighborhood
10. Renovation of homes at 517 & 525 N. Farris Ave for affordable home ownership
11. Ongoing predevelopment of 8 units of new housing for affordable homeownership at 517 N. Farris and 604 N. San Pablo Ave.
12. Ongoing acquisition and rehab of 617-619 N. Fulton Ave. to be a non-profit center
13. Ongoing CUP for The Belmont

Additionally, the board of directors of our organization included diverse backgrounds and experience:

1. Real estate agent





2. Two musicians
3. Artist
4. User experience design researcher
5. Two educators
6. Substance abuse counselor
7. Registered nurse
8. And two LGBTQ+ health educators and non-profit founders

Our other Policy Committee members that contributed to this letter bring additional diverse experience and perspectives including: city planning, photography, nonprofit leadership and CEQA expertise.

Our organization was born out of the community organizing and design for Broadway Parque. So we strongly believe in including community in the projects and policies that we advocate for. Living out those values, we have gone door to door informing and listening to South Tower neighbors about their concerns and barriers for health and prosperity and as well as their aspirations and assets to contribute to a shared vision.

When the draft Specific Plan Update was made available, we organized a study session at Broadway Parque that 12 community members were able to attend. We broke out into 6 groups each group reading and discussing one chapter. The group discussion following the chapter break out groups generated numerous detailed comments that follow. Many of these topics were uplifted by our group throughout the Specific Plan outreach process. Hopefully this letter will have a greater impact on the final plan.

The comments that follow are focused on improved social determinants of health in a framework of correcting racial and economic inequities experienced by South Tower residents and other residents who do not yet enjoy the full vitality that some Tower District residents have the privilege of enjoying. These comments also come from the perspective of a community development organization that has a proven ability to increase park and affordable housing access. It took decades to arrive at this point of disparity and we commit to the decades of work that will take to dismantle the barriers and structures that continue these inequities.

02 Conservation & Historic Preservation

Page 32 2.1 It is appropriate to mention here that the growth to Tower District from Downtown was part of White Flight and redlining with racial covenants excluding many demographics from renting or owning homes or businesses north of Olive.



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Page 33 Health and equity section should note the loss of historic structures and threat of more historic structure loss with industrial expansion.

Page 41 the example images used for context sensitive infill development are not context sensitive. The massing and materials of both do not respect or reflect the buildings adjacent to them. A good example of context sensitive design is 541 @ South Tower. It is new construction but with urban massing and art deco design built in 2016. But it does not appear anywhere in the Specific Plan or Design Standards

Page #44: CHP 1.5 The historic survey of South of Belmont West of Broadway should place priority on identifying historic buildings and assets at risk from industrial expansion and deferred maintenance.

CHP 1.7

- comment: The Belmont phoenix palms and the deodar cedars should be mentioned here or under 2.2

Page #47: CHP 2.1

- comment: This would be stronger if it said “hold accountable property owners...” instead of the more passive “work to preserve...”

03 Land Use

During the land use map initiation meeting with Fresno City Council, Councilmember Nelson Esparza motioned to study 604 N. San Pablo Ave for rezone from RS-5 to Mixed Use. That motion was seconded and voted affirmatively by all councilmembers. That rezone does not appear to be included on any map or text in the plan or EIR. The 604 N. San Pablo Ave. The property is owned by South Tower CLT and we have aspirations to develop a mixed use development on site. We would like to see that Council vote honored and included in this plan.

Table 3.B in the EIR on page 3-21 the table assumes the loss of 6 housing units. However a total of 24 units of existing housing are zoned industrial. We don't understand why any homes should be lost for industrial expansion especially in the context that there are few mitigations to protect other housing that will become adjacent to industrial when those homes are lost and converted to industrial uses.

Table 3-B states there are 13 acres of vacant or underutilized Light Industrial with 6 units of housing to be removed. Can the plan identify the vacant / underutilized industrial land? Also of note during the planning process one industrial business Patton Air Conditioning purchased an existing home zoned industrial adjacent to other housing, they demolished the home and built a parking lot with bright lights and storage containers that are not appropriate for residential areas. Producers Dairy demolished several agricultural buildings from early 1900's that were eligible for historic designation for a planned parking lot.

EIR 3.6.2.3 states “Light industrial uses are located along the southwest boundary of the Specific Plan Area. These areas are important historical and economic centers, as they bring employment



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opportunities. Some of these businesses have been in the neighborhood for many decades and have long-standing relationships with local residents and institutions.”

Page #66 : Figure 3.2

- Comment: “Please show the community feedback that requested this downzoning.”
- Comment: The Cheese building and properties to its south need to be Public Facility with a NMX or CMS dual designation. It’s original designation should have been considered spot zoning. Keeping it industrial today is not incentivizing the property owner to maintain it per their covenant; instead it is incentivizing the continued use of the lot as an industrial parking lot in a residential neighborhood.
- Comment: Light industrial zoning needs to have an asterisk similar to the Southwest Fresno Specific Plan to indicate the zoning will change when existing users leave. Or, there needs to be a policy committing the City to rezone this area should that occur. Office and Business Park should be examined as more neighborhood friendly alternatives.

Page #67: 3.6 Industrial and Employment Compatibility

- Comment: This statement is out of balance. While they are an old company, they haven’t always benefited the community. Instead they have a history of expansion into the neighborhood. Quantify “important” and what is the value of that importance compared to the health of their neighbors? Or opportunity costs of lack of space for other uses and lowered property values for the neighborhood?

Page #67: 3.6 Industrial and Employment Compatibility

- Comment: How many employees? I’ve only heard a statistic referencing a distance of ten miles which includes Clovis and therefore is not just the neighborhood.

Page #67: 3.6 Industrial and Employment Compatibility

- Comment: Can the City verify that a dairy plant is a light industrial use and not a heavy industrial use and what keeps it from being considered a heavy use?

Page #79: LU 4.3

- Comment: Drive throughs should not be allowed anywhere in the Tower District. Also, they are already not allowed in CMS.

Page #81: LU 6.1 Maintain industrial zoning for existing industrial uses, while striving to mitigate their negative effects on residential areas.

- Comment: “Striving” is not a commitment. There is no try only do. “Consider...consider...explore...” this policy has no teeth and is simply lip service to the residents.
- Comment: Why aren’t there any design standards for Employment Uses including Industrial?

Page #81: LU 6.2 Allow light industrial uses to have neighborhood-serving retail.



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- Comment: What about requiring CBAs anytime an industrial business wants to expand in the Tower?

Page #82: LU 6.4 Support the San Joaquin Valley Air Pollution Control District in monitoring emissions.

- Comment: What is the point of this policy if it doesn't require more than what's already required?

04 Parks and Public Spaces.

Per the EIR page 81, the Specific Plan area currently has 8 acres of parks accounting for 0.33 park acres per 1,000 residents short of the 3 acre per 1,000 residents standard in the 2035 General Plan and Parks Master Plan. This means the Tower District Specific Plan has a deficit of 64 acres of parks. The proposed policies and "park opportunities for study" identified on Figure 4.1 fall far short of filling the need for 64 acres of new park in the Tower District. This plan should identify at least 64 acres of new park within the plan area. It is appropriate to identify more that 64 acres of potential parks space knowing that some opportunities will not come to fruition.

Page 90 : Figure 4.1

- Comment: Bradway Parque is complete and should not be noted as "planned"
- The vacant property on Clinton on the western edge of the plan area is under development now.

Page #93: Figure 4.3 Measure P Park Prioritization for Future Parks

- Comment: The data shows that there needs to be a stronger commitment to parks. Potential new parks should be shown on the land use map to give the City more opportunities to potentially add park space.

Page #94: Planned Parks

- Comment: disagree, the original subway was probably better

Page #96: Canalside Parks

- Comment: herndon

Page #97: 4.4 Public Schools and Libraries

- Comment: highlighted typo of the word, "currently"

Page #101: POS 1.5 Pursue joint-use partnerships with schools in the Tower District.

- Comment: parking or parks?

1. Circulation

Page #119: 5.5 Pedestrians

- Comment: highlighted text of unfinished sentence under image in margin, "Sidewalk gaps, as in the south Tower District area, are a barrier to..." incomplete sentence



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05 Circulation

H Street and Weber are ideal for bicycle and pedestrian traffic to and from Tower District and Downtown. These roads should include pedestrian oriented lighting standards and protected bike lanes to keep those active transportation methods safe from truck traffic.

06 Utilities

Page 155 Figure 6.5 - The previous Tower District Specific Plan recommended a trail along Dry Creek Canal. The right of way along the canal has not been kept open to allow for a trail adjacent to the canal in many places. Undergrounding the canal into a pipe would allow for a trail above the canal and would reduce drowning risk, water contamination and evaporation. FID would be an essential partner in that work. Also FID is a potential blocker for development. Their requirements nearly stopped the development of the 541 @ South Tower development. FID needs to be proactively engaged.

Although the City does not have direct control over electricity provision, it may be worthwhile to provide information on it since it can inhibit the development of new housing units, including ADUs. It also factors into sustainability and affordability.

- a. Recommendation: Work with PG&E to determine priorities for transformer replacement and undergrounding of power lines.

6.4 Solid Waste - Trash enclosure requirements for commercial and multifamily residential or mixed use projects can be a barrier to designing quality urban site plans. a. Recommendation: Allow for flexibility for urban developments on tight in-fill sites to utilize hand cart for solid waste, recycling and green waste rather than dumpsters. This will free up precious square footage for other uses while also encourage limiting waste produced on site.

Recommendation: Add publicly accessible trash cans on sidewalks throughout the commercial corridors that can be emptied with automated lift of existing garbage trucks to reduce cost of trash collection and limit trash overflows and littering.

Broadband internet access is a key equity issue.

- Recommendation: Identify areas of Tower District that lack broadband access.
Work with broadband providers to encourage full coverage.

07 Implementation

Page 164 7.4 Review Bodies this existing Tower District Design Review Committee that is an official committee of citizens appointed by the Mayor and City Councilmembers is not listed among the review



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bodies. Will that committee be dissolved? This may have some overlapping purpose with the description of the Tower District Specific Plan Implementation Committee and the Council District Project Review Committee. Additionally, the Council District Project Review Committees are listed twice.

Page 166 Our organization is incorrectly listed as “South Tower Trust” our correct name is South Tower Community Land Trust [South Tower CLT]

Appendix B Health and Equity Evaluation

Page #190: Policy recommendations grid (orange)

- Comment: This row should have more negatives by to reflect the negative healthy and equity outcomes of keeping industrial in the neighborhood.

Noise Pollution - Despite public comments about noise pollution from the Producers Dairy industrial facility at Palm & Belmont, the three noise monitoring locations included in the EIR are nowhere near the Producers Dairy or an industrial zoned facility adjacent to residential. Without proper study of the existing noise levels near the industrial section of South Tower, there is no baseline for noise mitigation measures. Only 3 sound monitors were included in this plan. We believe an additional monitor should be included at Palm & Franklin to capture the industrial noise levels adjacent to residential. Given other comments about concern of night life noise levels on the Olive corridor, it is appropriate to capture data somewhere along the Olive corridor.

Light Pollution - The bright lights at Light Industrial businesses adjacent to residential uses has been uplifted during public comments as inappropriate for the peaceful enjoyment of those homes. A study of light pollution should be include in the EIR and mitigation measures should be proposed to limit light pollution bleeding from Industrial properties to residential ones.

EIR

Table 4.1.A does not include pollutants known to be included at the Producer’s Dairy facility. See 2019 settlement between EPA and Producers Dairy related to anhydrous ammonia. “Producers Dairy Foods’ industrial refrigeration system uses large quantities of anhydrous ammonia, a toxic chemical highly corrosive to skin, eyes and lungs.”

<https://www.epa.gov/newsreleases/us-epa-settlement-producers-dairy-foods-improves-chemical-safety-fresno-california>

Design Standards - Most notably the design standards & guidelines contain no section for Industrial Districts. A large amount of residential single family and mixed-use zones are adjacent to light industrial zones. The conflict and lack of mitigation of negative impacts by industrial has been the topic of many public comments through this process. The Design Standards are an excellent places to include standards for those mitigations but that opportunity is completely ignored.



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Thanks again for the opportunity to comment and we hope these comments will be thoughtfully considered for their impact of health and equity of Tower District residents and for the advancement of developments being led by South Tower CLT.

With gratitude,



Kiel Lopez-Schmidt
Executive Director
South Tower Community Land Trust

