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**To:** [cdd](#); [Peters, Sarah](#)  
**Cc:** [Smith, John](#); [O'Neal, Chantell](#); [Gurewitz, Heather](#); [sarah mccormick](#)  
**Subject:** Public Comment -- 5/11/22 PC Mtg., Item No. 7A, CIP Consistency  
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Planning Commission,

Please see the below comments concerning the CIP list and the different projects' consistency with the applicable general plan policies. I encourage you to insist on adequate general plan consistency analysis prior to adopting any resolution and to remove the second project because it is likely inconsistent with the Inland General Plan due to incompatibility with adding roof-mounted solar arrays to City Hall rather than over the adjacent parking areas because City Hall is an historic resource and solar arrays are not historically appropriate or aesthetically compatible with the building.

The project list and resulting consistency "analysis" are lacking in necessary detail and require significant revision prior to adopting the proposed resolution, at least in my opinion.

Regards,

--Jacob

#### **PUBLIC COMMENT ON CIP GENERAL PLAN CONSISTENCY ANALYSIS**

The CIP project described as "City Hall - Roof and Solar" has significant consistency issues with the Inland General Plan, which were not addressed in the table purporting to provide general plan consistency analysis. The current planning staff do not appear to understand what general plan consistency analysis entails and the Planning Commission would be wise to not just adopt the failed attempt to do so, and should instead refer the matter back to staff for further detail. First, the project descriptions are lacking in the level of specificity that is necessary in order to actually evaluate whether or not the particular projects are consistent with the City's applicable general plan. I actually asked staff about one of the listed projects and she indicated she did not know what the project involved. How can someone evaluate a project for consistency with applicable general plan policies if she does not know what the project proposes to do?

City Hall is clearly an historic resource because it meets the criteria to be designated as such regardless of its current status. As such, all projects to maintain, remodel, or modify the structure need to be evaluated for potential conflicts with maintaining the historic character of the structure. This project proposes to make repairs to the existing roof of City Hall and to also add solar panels to the roof. Solar panels are not historically accurate or appropriate for a building like City Hall because they did not exist in that time period and would negatively impact the historic integrity of the structure. Prior projects also diminished the historic integrity of the structure but were later corrected through a restoration project. Adding solar panels to the roof of City Hall would seriously detract from the historic integrity of the project and should be avoided. Moreover, there are several applicable Inland General Plan policies that appear to be inconsistent with adding solar panels directly to the roof of City Hall, including those listed below.

#### **Land Use Element**

Policy LU-3.1 Central Business District : Retain and enhance the small-scale, pedestrian-

friendly, and historic character of the Central Business District (CBD).

*Consistency: Adding historically-incompatible solar panels to the roof of City Hall would not retain or enhance the historic character of the Central Business District because solar panels, particularly those visible from the public right-of-way, would detract from the historic character of the CBD by introducing a modern design element and feature to a prominent historic building within the CBD.*

Policy LU-3.3 Historic Buildings and Mixed Uses : In the Central Business District and in other commercial areas with historic residential structures, encourage residential uses, mixed residential, and commercial uses, and the preservation of historic structures.

*Consistency: Adding historically-incompatible solar panels to the roof of City Hall would not help preserve historic City Hall. In fact, adding the additional weight of the solar panels to the roof support structure may increase the load sufficiently to harm the structural integrity of the roof or require further building modifications that diminish the overall historic integrity of City Hall.*

### **Community Design Element**

Policy CD-1.3 Scenic Views and Resource Areas : Ensure that development does not adversely impact scenic views and resources as seen from public rights-of-way.

*Consistency: City Hall is an attractive historic building in a prominent location within the Central Business District, which constitutes a scenic resource that is visible from the public right-of-way. Adding discordant design details like roof-mounted solar arrays negatively impacts that scenic resource. The City has alternative and preferable means of adding more sustainable electricity sources than adding a solar array to the roof of City Hall, including mounting the desired solar arrays to shade structures in the adjacent parking lots as has been implemented at other public facilities in town (e.g., the schools and senior center).*

Policy CD-2.5 Strengthen the Distinctive Identity of the Central Business District: Strengthen the distinctive identity and unique sense of place of the Central Business District.

*Consistency: Adding solar arrays to the roof of historic City Hall diminishes rather than strengthening the distinctive identity and unique sense of place of the Central Business District by introducing historically-inappropriate roof-mounted solar arrays to existing historic buildings that contribute to the unique sense of place present in our historic CBD.*

Policy CD-6.1 Protect and Preserve Buildings and Sites with Historic and Cultural Significance to the Community

*Consistency: As stated above, adding historically-inappropriate roof-mounted solar arrays to a significant historic building in a prominent location within the CBD does not preserve or protect this historic building or site that has cultural significance to the community. Rather, adding the solar arrays would detract from and diminish the historic integrity of City Hall. The roof replacement component of the project is consistent with this policy because that type of maintenance protects the structure from leaks and water damage but the project remains inconsistent with this policy because of the proposed solar arrays.*

### **Public Facilities Element**

Policy PF-2.7 Public Buildings: Ensure that public buildings in the City are adequate to provide services for the community.

*Consistency: This is the only applicable policy highlighted in the staff-prepared "analysis" but it seems somewhat misplaced because adding a solar array does not do anything to provide services to the community. Replacing or repairing the roof of City Hall obviously helps ensure*

*the continued viability of City Hall as a place where services are planned and provided but the troubling aspect of adding a solar array as part of the roofing component of this project does not further this community objective and policy.*

### **Sustainability Element**

Policy S-1.3 Municipal Green Building and referrals as part of all new construction of City-owned buildings shall incorporate sufficient green building methods and techniques to qualify for the equivalent of LEED Certified rating. Renovation of City-owned buildings shall seek to incorporate LEED prerequisites and credits, where feasible.

*Consistency: This project may or may not be consistent with this policy but we cannot know if it is without additional details about what is proposed to be included in this particular project. This renovation project does not state that it will incorporate feasible LEED prerequisites but doing so is clearly a requirement of this policy, which uses the term "shall, which presents a requirement rather than simply something that is encouraged or discouraged.*

Policy S-2.5 Use of Local and Renewable Energy : Buildings and infrastructure that create and/or use locally and renewably generated energy are encouraged. Photovoltaic and wind energy systems are encouraged. The installation of solar panels or other clean energy power generation sources over parking areas is preferred.

*Consistency: Adding roof-mounted solar arrays to City Hall is partially consistent with this policy that encourages photovoltaic systems but it is not fully consistent because this policy includes an additional provision, which was omitted from the staff "analysis" that clearly states that solar power generation sources over parking areas is preferred. If the City wants to help achieve other applicable policies and objectives by incorporating sustainable energy aspects into projects on public facilities, particularly on a public facility that is an historic resource, it shouldn't cherry-pick only some language from an applicable general plan policy and then ignore the other part of the policy that clearly demonstrates that an alternative means of achieving the same objective are preferred. In this case, any new photovoltaic solar arrays should be installed over the adjacent parking areas next to City Hall and the former Footlighters building rather than directly on the roof of the historic structure in a way that would diminish the historic integrity and scenic value of City Hall itself.*