



**SAN MATEO
HERITAGE ALLIANCE**

September 25, 2023

Ms. Manira Sandhir, Planning Manager
City of San Mateo, Community Development Department
330 20th Ave.
San Mateo, CA 94403

Dear Ms. Sandhir:

Congratulations on completing the Draft EIR for the San Mateo Draft 2040 General Plan. It is a well written, visually appealing document.

The San Mateo Heritage Alliance appreciates that you have incorporated many of our comments on the General Plan policies to identify historic resources more broadly in San Mateo and use more appropriate terminology for the definition of historic resources.

The Draft EIR Cultural Resources section, however, is incomplete. The section is therefore inadequate and must be revised and recirculated for public comment for these substantial reasons:

1. 4.4.1.2, Existing Conditions section is missing a description of at least two National Register of Historic Places eligible historic districts—Baywood and Yoshiko Yamanouchi House.
2. The impact discussion is missing an analysis of the project effects on historic districts.
3. The impact conclusion is not supported by the impact analysis.
4. General Plan policies are not reliable mitigation measures to avoid or reduce the significant adverse impacts that may be caused by the project. The City of San Mateo has failed to comply with its General Plan policies regarding historic resources for the past 25+ years.
5. CEQA is not a reliable mitigation measure for the significant adverse impacts that may be caused by the project. The City of San Mateo's compliance with CEQA has been selective, and most often used to justify demolition and not protection of historic resources.

We offer the following comments on the Draft EIR.

4.4 Cultural Resources

4.4.1.2 Existing Conditions

p. 4.4-9, para. 2: The existing conditions section is not complete because it does not include two documented historic districts:

1. The Baywood Historic District is bounded by Alameda de las Pulgas, Crystal Springs Road, Eaton Road, Virginia Avenue, Edinburgh Street, and Notre Dame.
2. The Yoshiko Yamanouchi House Historic District is at 1007 East 5th Avenue.

The City received the *Baywood Historic Asset Analysis* (Brandi 2022) in April 2022. This report identifies the historic context of the Baywood neighborhood, the boundary of the Baywood Historic District, and the criteria under which the Historic District is eligible for the National Register of Historic Places. This report should be referenced in the EIR. In addition, San Mateo Heritage Alliance is submitting an

additional report on the Baywood Historic District that identifies the district boundaries, provides information on each property in the district, and identifies the contributors to the district and the properties that are not contributors.

The Yoshiko Yamanouchi House Historic District has 9 resources on the property including 3 buildings, 3 sites, and 3 structures. This information should be included in the Draft EIR and the effects on the districts from increased adjacent traffic should be analyzed. The effects on the Yoshiko Yamanouchi House Historic District is potentially significant due to the increased levels of traffic and pollution.

4.4.4.1 Regulatory Framework

The discussions of cultural resource regulations does not include the regulatory framework for historic districts. The treatment of historic districts may be different than the treatment of individual historic properties. It is important to understand the regulatory framework for districts because the City has four historic districts; two identified as part of the 1989 Historic Building Survey, the Baywood Historic District, and the Yoshiko Yamanouchi House Historic District.

CULT 1:

Thank you for acknowledging the potential impact of incompatible new buildings adjacent to historic buildings or districts. The City's practice has been to only address the direct effects of the project on historic resources. The impact of new development on the Downtown Historic District has not been analyzed or mitigated (e.g., Prometheus building at the former Trag's site).

p. 4.4-11, para. 2 states:

“properties in the EIR Study Area that are listed in or determined to be eligible for listing in the National and California Registers would be categorized as historic resources even if they are not formally landmarked by the City.”

This statement cannot be relied upon because the City has not followed these procedures. The City did not include the Baywood or Yamanouchi districts in this EIR. The City disregarded the Baywood historic district report (Brandi 2022) that outlined the boundaries of the district and identified Baywood as an eligible historic district, as well as a memo that indicated the property was a contributor to the district. The City did not treat the property as a historic resource and permitted demolition of the property without conducting the appropriate CEQA review.

p. 4.4-11:

Policy CD 5.3: Historic Resources Definition. Define historic resources as buildings, structures, sites, and districts that are listed in or determined to be eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources, designated resources in the 1989 Historic Building Survey Report, and resources found to be eligible through documentation in a historic resources report.

The City currently treats contributors to the Downtown Historic District as historic resources. This definition of historic resources only include districts. The City Historic Resources Code, which only applies to the Downtown Historic District currently states:

27.66.040 CONFORMANCE WITH STANDARDS AND GUIDELINES.

(a) City-wide. All exterior modifications of individually eligible and contributor buildings (e.g., exterior building additions and alterations) shall conform with the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures, 1990 Edition.

This code implies contributors are treated as historic resources. Will contributors in new districts be required to follow the Secretary of Interior's guidelines for exterior modifications?

Please add "contributors to eligible historic districts" to the definition of historic resources in Policy CD 5.3, to be consistent with how Downtown historic resources are treated. Contributors to historic districts must be protected in order to protect the integrity of the district.

Please provide a reference or more information about the requirements of a historic resources report.

Impacts to Historic Districts

The impact analysis should address the potential for direct and indirect significant effects on eligible historic districts and their contexts, especially for areas that have not yet been fully surveyed. The Yoshiko Yamanouchi House Historic District could be adversely affected by the proposed project, including increased traffic and the reconstruction of the 3rd/4th Avenue Interchange. Please revise the analysis to include an analysis of the impacts on the historic district.

The Aragon and San Mateo Park neighborhoods border El Camino Real development areas. Hayward Park borders the railroad development corridor and El Camino Real development corridor. The analysis is incomplete because it does not consider the potential for direct and indirect impacts on unsurveyed potential historic districts identified in the 1989 *Historic Building Survey*. The impact analysis should be revised to address this new impact.

General Plan policies are not a reliable means of mitigating potential significant adverse impacts to historic resources because the City fails to comply with its own policies.

- The City of San Mateo has for 13 years disregarded its adopted General Plan policies regarding historic resources.
- The City has failed to comply with current General Plan policy C/OS 8.2 Historic Districts. The policy requires the City to "Consider the protections of concentrations of buildings which convey the flavor of local historical periods or provide an atmosphere of exceptional architectural interest or integrity, after additional study." and "In consideration of future historic districts, specific regulations to maintain historic character **shall** be developed." The City continues to disregard this policy by refusing to acknowledge identified eligible historic districts and permitting demolition of historic resources to occur unabated and unaffected by its General Plan policies.
- The City has failed to comply with current General Plan policy C/OS 8.4 Inventory Maintenance. This policy directs the City to "Establish and maintain and inventory architecturally, culturally and historically significant structures and sites." It also warns that "without maintenance, the inventory becomes unreliable and unusable." For 34 years the City has failed to maintain or update the 1989 *Historic Building Survey* resulting in the continual and unabated loss of historic resources.

Policy CD 5.7: Demolition Alternatives

Please add the requirement to identify demolition alternatives for contributors to a historic district.

Action CD 5.8: Historic Resources Context Statements, Action CD 5.9: Historic Resources Survey, and Action CD 5.10: Historic Preservation Ordinance

These actions imply they will be conducted sequentially (Prepare neighborhood-specific historic context statements prior to updating the historic resources survey.) Please update the Historic Preservation Ordinance **first** to address the two new eligible historic districts (the Yoshiko Yamanouchi House Historic District and Baywood Historic District).

p. 4.4-13 Significance without mitigation: Less than significant Conclusion.

The conclusion that the proposed project would not cause a substantial adverse impact on historical resources is contrary to the discussion of the many ways the proposed project could have significant adverse impacts on historical resources:

- “Implementation of the proposed project could have the potential to directly impact cultural resources by altering land use regulations that govern these properties or surrounding sites.”
- “Potential impacts from future development on, or adjacent to, historical resources could lead to demolition...inappropriate modification...inappropriate new construction... incompatible new buildings.”
- “Development activities under the proposed project therefore have the potential to be incompatible with historical resources, which could be a significant impact.”
- “If new development were to directly impact existing resources, impacts on historical resources could be significant.”

Based on the above statements from the impact discussion, the conclusion should be amended to read **“the proposed project has the potential to cause a substantial adverse change to historical resources.”**

The California Environmental Quality Act (CEQA) is not a reliable means of mitigating potential significant adverse impacts to historic resources.

CEQA does not prevent demolition of historic resources. The City can make overriding considerations that housing is more important than historic resources. The impact analysis does not support the conclusion of no significant impact with no mitigation. The Draft EIR (p. 4.4-13)states:

“Under CEQA, conformance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties would normally mitigate impacts to a less-than-significant level. Because the proposed General Plan is a program level document, it is not possible to determine whether individual projects under the proposed project would be able to conform with the Secretary of Interior’s Standards. ... The requirement for subsequent CEQA review, pursuant to state law, would minimize the potential for new development to indirectly affect the significance of existing historical resources to the maximum extent practicable.”

This statement suggests that some significant impacts may not be mitigated through compliance with the Secretary of Interior's Standards or through CEQA review. If no additional mitigation is imposed the project could result in significant unavoidable adverse effects. Additional mitigation measures should be presented.

Recirculation is Necessary

The Draft EIR should be recirculated in accordance with CEQA Guidelines 15088.5. Recirculation of an EIR Prior to Certification because the impact analysis is incomplete and new mitigation measures are necessary. The lack of the impact analysis and mitigation measures deprives the public of a meaningful opportunity to comment.

CULT-4

The proposed project would not, in combination with past, present, and reasonably foreseeable projects, result in cumulative cultural resources impacts in the area.

The discussion under this impact does not describe the specific or even a general discussion of the number of historic resources lost through development to date. It is not possible to credibly assess cumulative impacts with no discussion of impacts to date.

The Downtown Historic District has been eroded on all sides:

- The entrance at Third Avenue and El Camino Real
- Prometheus building on Baldwin
- Redevelopment of Donut Delite and Talbots
- The 6-7 story buildings on 3rd and 4th east of the railroad.

Please provide the number of downtown historic buildings and contributors modified or demolished to date. What is the cumulative impact threshold for losses of historic buildings in the historic districts, especially the Downtown Historic District? Mitigation is necessary for the potentially significant cumulative effects.

I look forward to reviewing the revised Draft EIR with the missing analyses and mitigation measures.

Sincerely,

San Mateo Heritage Alliance