

**From:** Laurie Hietter [REDACTED]  
**Sent:** Wednesday, November 1, 2023 4:48:33 PM  
**To:** City Council (San Mateo) <[CityCouncil@cityofsanmateo.org](mailto:CityCouncil@cityofsanmateo.org)>; Alex Khojikian <[akhojikian@cityofsanmateo.org](mailto:akhojikian@cityofsanmateo.org)>; Zachary Dahl <[zdahl@cityofsanmateo.org](mailto:zdahl@cityofsanmateo.org)>  
**Cc:** Patrice Olds <[polds@cityofsanmateo.org](mailto:polds@cityofsanmateo.org)>; Manira Sandhir <[msandhir@cityofsanmateo.org](mailto:msandhir@cityofsanmateo.org)>; Christina Horrisberger <[chorrisberger@cityofsanmateo.org](mailto:chorrisberger@cityofsanmateo.org)>  
**Subject:** Requested Changes to General Plan to Add Contributors

Dear City Council Members and All:

The historic preservation policy language of the 2030 General Plan was very subtly changed in the 2040 General Plan. The changes modify City policy and significantly reduce protection for our vanishing historic buildings.



**SAN MATEO  
HERITAGE ALLIANCE**

November 1, 2023

City Council  
City of San Mateo  
330 W. 20<sup>th</sup> Ave.  
San Mateo, CA 94403

**SUBJECT:** General Plan Policies Regarding Historic Resources, Historic Districts and Contributors

Dear City Council Members:

In previous submittals and meetings, the San Mateo Heritage Alliance has stressed the importance of continuing to treat buildings that contribute to historic districts (contributors) as historic resources. The current General Plan and Historic Resources Code includes contributors in the definition of historic resources.

We are concerned that subtle words changes in the 2040 General Plan are significantly changing City policy:

1. Changing the definition of historic resources to remove contributors to historic districts.
2. The word contributor in Chapter 10 Glossary has no bearing on policy
3. Changing preservation of historic districts from protecting concentrations of important buildings to protecting concentrations of historic buildings (meaning those buildings already evaluated and designated historic)

We request that the Council revisit the policies in the Community Design and Historic Resources Element and make the following changes:

**Policy CD 5.1: Historic Preservation.** Actively identify and preserve historic resources and concentrations of historic resources and concentrations of buildings which convey the flavor of local historical periods, are culturally significant, or provide an atmosphere of exceptional architectural interest or integrity, when they meet national, State, or local criteria. Historic resources include individual properties, districts, and sites that maintain San Mateo's sense of place and special identity, and enrich our understanding of the city's history and continuity with the past.

**Policy CD 5-3: Historic Resources Definition.** Define historic resources as buildings, structures, sites, and districts, and contributors to 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.

These changes will ensure continued protection of historic districts and the buildings that make the districts special. Additional discussion is included in the attachment. Thank you for your consideration.

Sincerely,

Laurie Hietter  
President



## ATTACHMENT

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### ADDITIONAL DISCUSSION OF HISTORIC RESOURCES POLICIES

#### Definition of Historic Resources Should Include Contributors to Historic Districts

One of the goals of the San Mateo Heritage Alliance is to preserve and protect historic resources and the contributor buildings in historic districts. The City of Redwood City, San Francisco, Portland, and many other cities protect contributors in historic districts. The City's current policies support protection of contributors in the Downtown and Glazenwood Historic Districts. The General Plan should be clear on this policy.

Only the historic *district* is the *historic resource* subject to CEQA. Contributors do not qualify as historic resources or the consideration provided historic resources. **The City has latitude to designate any important properties as historic resources. The City's policies in the current General Plan and the Historic Resources Preservation Code currently support the protection of contributors as historic resources, as do many cities.**

The wording changes in the combined Policy CD 5.1 restrict the definition of historic resources and protection to only those resources that are individually eligible for listing on the State or National Register, which is a very high bar to achieve protection. There is no protection at all (even the minimal consideration of a CEQA analysis) for contributor buildings in a district until the point where so many buildings in the district are altered that the historic integrity is lost.

The current 2030 General Plan defines historic resources as:

**C/OS 8.1: Historic Preservation.** Preserve, where feasible, historic buildings as follows:

d. Historic building shall mean buildings which are on or individually eligible for the National Register of Historic Places, California Register of Historical Resources, or Downtown Historic District contributor buildings as designated in the 1989 Historic Building Survey Report, or as determined to be eligible through documentation contained in a historic resources report.

The 2040 General Plan revised the definition of historic resources to remove the word "contributor:"

**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.

Deciding to treat contributors as historic resources is a policy decision. The language changes in the 2040 General Plan change the level of protection of buildings in historic districts, which is a significant impact not addressed in the Draft EIR. **A new significant impact is cause for recirculation of the Draft EIR.**



The goal to protect contributors to historic districts is consistent with the 2030 General Plan policy O/S 8.2:

**C/OS 8.2: Historic Districts.** Consider the protection 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.

### **Definition of Historic District Changes**

The Draft 2040 General Plan revised the policy to remove the word “districts,” and substituted “concentrations of historic resources” for “concentrations of buildings.” The policy now has a totally different meaning. The 2030 General Plan policy is to protect a group of important buildings. The new language in Policy CD 5.1/2 only protects groups of buildings that meet the definition of historic resources: those that are on or individually eligible for listing on the State or National Register.

**2030 C/OS 8.1: Historic Preservation.** Preserve, where feasible, historic buildings as follows:

d. Historic building shall mean buildings which are on or individually eligible for the National Register of Historic Places, California Register of Historical Resources, or Downtown Historic District contributor buildings as designated in the 1989 Historic Building Survey Report, or as determined to be eligible through documentation contained in a historic resources report.

**2040 Policy CD 5.2 Historic Resources Preservation.** Actively identify and preserve concentrations of historic resources, which convey the flavor of local historical periods, are culturally significant, or provide an atmosphere of exceptional architectural interest or integrity, when they meet national, State, or local criteria.

The definition of Historic Resources in the 2040 General Plan Chapter 10 includes contributors only in Downtown and Glazenwood, and is a narrow definition of historic resources. As stated by Joanna Jansen (Placeworks) at the October 30 City Council meeting, the definitions in the Glossary do not represent the policies.

**2040 Chapter 10 Glossary: Historic Resource.** A historic resource is a building, structure, site, or district that has one or more of the following characteristics:

- Listed in or determined to be on or individually eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources.
- Identified as a Downtown Historic District or Glazenwood Historic District contributor building as designated in the 1989 Historic Building Survey Report.
- Determined to be eligible through documentation contained in a historic resources report.

### **Zoning Code includes Contributors**

The City of San Mateo Zoning Code sections 27.66.020 Applicability, 27.66.040 Conformance with Standards and Guidelines and 27.66.060 Demolition all treat contributors as historic resources and in the same way as individually eligible properties.

#### **27.66.020 APPLICABILITY.**

**(a)** Historic Buildings and Downtown Historic District. The provisions of this chapter shall apply to all individually eligible buildings in the City, all individually eligible and contributor buildings within the



Downtown Specific Plan area, and all structures located in the Downtown Historic District, as adopted by resolution of the City Council.

(b) The City Council by resolution may add to the provisions of this chapter **any building which it finds meets the criteria of contributing to the historic importance of downtown and the City.** Such an action shall be based on National Register of Historic Places and California Register of Historical Resources criteria and documented in a form consistent with the City of San Mateo Historic Building Survey.

(c) Individually Eligible and Contributor Buildings. For the purposes of this chapter, the terms "individually eligible building" shall mean those buildings as identified in the City of San Mateo General Plan. **"Contributor building" shall mean those buildings identified as such and located within the Downtown Historic District as adopted by resolution of the City Council and identified in the City of San Mateo General Plan.**

(d) For the purposes of this chapter, the terms **"individually eligible building" and "contributor building" and "Downtown Historic District" shall mean those buildings and district identified as such by resolution of the City Council or identified in the City of San Mateo Downtown Specific Plan.**

### **Discussion at 10/2 City Council Meeting**

At the City Council Meeting on 10/2 the Council members expressed a lack of understanding about what contributors meant. It was stated that it does not matter if it is in the General Plan or in the implementation language to be addressed later in the ordinance. I strongly disagree. The City currently has a policy to treat contributors as historic resources. The new General Plan dilutes and changes the policy (see above).

We were disappointed staff did not describe what contributors mean and that they have no protection under the current language. That discussion would have allowed the City Council to make an informed decision at the time. **We request the City Council revisit these policies.**

### **Updating the Historic Preservation Ordinance**

I understand that the City will be updating the Historic Preservation Ordinance next year but I believe the conversation of historic preservation policy in the General Plan 2040 is very relevant right now and should not be delayed to the implementation phase. The General Plan is the place to define policies.

### **Updating the City Website Regarding Historic Districts**

We understand staff will be updating the City Website with more information about what a historic district contributor is and the ramifications of a property being designated. That is good news for the Baywood community. Many people are looking to the City for clarification of what it means to be in a Historic District. Why can't the City tell us now? Either contributors are protected or they are not. The current plan protects them. The slight changes in the wording in the 2040 General Plan removes the protection.

### **Demolition Policies**

**Policy CD 5.7 Demolition Alternatives.** Require an applicant to submit alternatives to preserve a historic resource as part of any planning application that proposes full demolition. Implement preservation methods unless health and safety requirements cannot be met or the City Council makes a finding explaining the specific reasons why the social, economic, legal, technical, or other beneficial aspects of the proposed demolition outweigh the unavoidable adverse impacts to the historic resource. If a designated historic resource cannot be preserved, require City approval before the demolition of a historic resource.



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What is the definition of demolition for this policy? Leaving one wall is near total demolition. Requiring an alternatives analysis is a good idea. The staff should be empowered to evaluate the alternatives provided by the applicant for veracity, feasibility, and adequacy. There should also be a requirement for mitigation measures. The language should be clarified to add contributors to the definition of historic resources.