

**Sent:** Monday, March 4, 2024 3:27 PM

**To:** City Council (San Mateo) <[CityCouncil@cityofsanmateo.org](mailto:CityCouncil@cityofsanmateo.org)>; [rhedges@cityofsanmateo.org](mailto:rhedges@cityofsanmateo.org); Lisa Diaz Nash <[ldiaznash@cityofsanmateo.org](mailto:ldiaznash@cityofsanmateo.org)>; Rob Newsom <[rnewsom@cityofsanmateo.org](mailto:rnewsom@cityofsanmateo.org)>; Amourence Lee <[alee@cityofsanmateo.org](mailto:alee@cityofsanmateo.org)>; Adam Loraine <[aloraine@cityofsanmateo.org](mailto:aloraine@cityofsanmateo.org)>; Patrice Olds <[polds@cityofsanmateo.org](mailto:polds@cityofsanmateo.org)>

**Cc:** Keith Weber <[REDACTED]> Shirley Melnicoe <[REDACTED]>; Lisa Vande Voorde <[REDACTED]>

**Subject:** Comments on General Plan and EIR

Dear Mayor Diaz Nash and Council Members:

Please see my attached letter regarding:

- Including contributors to historic districts in the definition of historic resources in the General Plan, and
- Deficiencies in the EIR.

The protection of historic resources is in your hands tonight. Please follow through on your commitment to make historic preservation a priority in San Mateo before it is too late. Once they are gone, it will change our city forever.

Thank you for your serious consideration.

Sincerely,

Laurie



**SAN MATEO  
HERITAGE ALLIANCE**

March 4, 2024

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

Dear Mayor Diaz Nash and City Council Members:

The City is at risk of challenges to the EIR and subsequent litigation. There are at least four key flaws in the General Plan EIR:

1. **Inadequate mitigation.** The General Plan policies and CEQA are **not adequate to mitigate the loss of historic resources** because both allow for the demolition of historic resources. Additional mitigation must be defined or it must be identified as a significant unavoidable effect and requires findings.
2. **Analysis of removing contributors.** Removing contributors to historic districts from the definition of historic resources in the 2040 General Plan was a policy decision made by staff, not explained to the City Council, and reduces the protection of historic resources. This impact was not analyzed in the EIR.
3. **Analysis of effects to new historic district.** The EIR impact analysis did not evaluate the direct and indirect **effects on the Yoshiko Yamanouchi House Historic District** from increased traffic and deposition of particulates.
4. **Inadequate cumulative impact analysis.** The cumulative impact analysis is not adequate because it did not address the effects on historic resources described above.

### **General Plan**

“Contributors to historic districts” was **removed** from the General Plan Policy CD 5.3 Historic Resources Definition in the 2040 General Plan. **Please return contributors to historic districts to the definition of historic resources in the General Plan Policy CD 5.3 and revise the EIR.** The General Plan is like the constitution; important definitions need to be defined in the policies, not in a glossary, which is not enforceable.

I reviewed historic preservation ordinances for Peninsula cities from San Francisco to San Jose. Two cities do not have ordinances and one is being updated. *Every city with a historic preservation ordinance included contributors to historic districts as historic resources.*

The 2030 General Plan Policy C/OS 8.1 includes contributors:

- 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.

Please add contributors (added language underlined) to General Plan Policy CD 5.3:

**Policy CD 5.3: Historic Resources Definition.** Define historic resources as buildings, structures, sites, and districts (including contributors to historic 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.

Similarly, adding contributors to Action CD 5.12: Historic Resources Design Standards is not adequate to ensure protection of contributors to historic districts, as is in the current General Plan.

**Action CD 5.12: Historic Resources Design Standards.** Create objective design standards for alterations to historic resources and contributors to a designated historic district, and new development adjacent to historic resources within historic districts. Use the Secretary of the Interior’s Standards as the basis for these objective design standards to ensure projects have a contextual relationship with land uses and patterns; spatial organization; visual relationships; cultural and historic values; and the height, massing, design, and materials of historic resources.

2030 General Plan Policy C/OS 8.2 defines historic districts as concentrations of buildings. The 2040 General Plan changes the definition to “concentrations of historic resources.” This seemingly minor change actually raises the bar for defining a district to include “historic resources,” which by definition are individually eligible for listing on the State or National Register. The Registers do not require buildings to be individually eligible for listing to qualify as a historic district.

**2030 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.

**2040 Policy CD 5.12: Historic Preservation.** Actively identify and preserve historic resources and concentrations of historic resources buildings which convey the flavor of local historical periods, are culturally significant, or provide an atmosphere of exceptional architectural interest or integrity, as feasible, when they meet national, State, or local criteria. Historic resources, including individual properties, districts, and sites to that maintain San Mateo’s sense of place and special identity, and to enrich our understanding of the city’s history and continuity with the past.

### San Mateo Growth

The majority of voters have made it clear in multiple elections that we don’t want intense urbanization with high rises in San Mateo. San Mateo can meet its RNHA requirements through 2031, without repealing Measure Y, and especially in light of the declining population. Measure Y passed only 3 years ago and sunsets in 2030. It is not clear why the City needs to spend the money on consultants and a ballot initiative in 2024.

Please make these changes to implement your commitment to making historic preservation a priority. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Laurie Hietter". The signature is written in a cursive style with a large initial 'L' and a long, sweeping tail.

Laurie Hietter  
President  
San Mateo Heritage Alliance