

February 4, 2021

Barry Miller, Consulting Planner
General Plan 2040
Community Development
City of San Rafael

Via email

RE: San Rafael Draft Downtown Precise Plan

Dear Barry,

Thank you so much for meeting with us last week to further explain the input process for the Draft Downtown Precise Plan.

San Rafael Heritage is committed to advocacy, provision of local expertise and support for historic preservation and compatible adaptive use of historic resources. Heritage recognizes historic preservation has a key role in our living and evolving city. Targeted preservation of historic and contributing resources is a hallmark of great downtowns. This instills authenticity and a sense of place and is a valuable urban design tool. Our shared mission distinguishes San Rafael from those cities that lack an excellent inventory of buildings which contribute to our downtown's unique fabric.

The renaissance of other successful cities' downtowns can in part be attributed to strategic historic preservation action. Cities such as Petaluma, Santa Rosa, Mill Valley, San Francisco, Pasadena, Redwood City and Santa Barbara owe part of their success to the rich and diverse environments resulting from retaining, restoring and maintaining historic resources in economically viable contemporary uses.

Heritage recognizes the need to balance property rights with other community goals and supports open dialogue with property owners and other stakeholders to inform them of the benefits and potential costs associated with landmark designation, preservation incentives and other considerations. The importance of providing meaningful incentives to compensate for perceived and actual constraints associated with landmark and historic district designation is an important motivator. This requires a commitment by the city's leadership, flexibility, open mindedness and respect for the needs of all stakeholders.

We look forward to continuing our partnership.

Yours truly,
Linzy Klumpp, President
San Rafael Heritage

cc Paul Jensen, Director of Community Development
SRH 2040/DTPP Subcommittee

San Rafael Heritage
General Observations on Draft Downtown Precise Plan (DTPP): Chapter 5
Balancing Preservation Interests with the Plan
February 4, 2021

Historic Resource Inventory

Heritage proposes review of the inventory for adjustments including recommendations for additions, deletions and modification of ratings, combining the findings from the 1978/1986 inventory and determining the status of resources that have been deleted from the DTPP inventory. There appear to be a modest number of properties on the Historic Resource Inventory prepared for the DTPP subject to interpretation where local knowledge will be of benefit.

Use of Preservation Mitigations:

Previous mitigation funds have been allocated without benefit of policy guidance. We recommend historic resource mitigation funds be retained in an account to allow them to be used for downtown San Rafael historic preservation priorities. Heritage recommends formation of policy and actions based on but not limited to the following:

1. Updating the historic resource inventory
2. Funding staff support for a Historic Resource Advisory Committee (HRAC)
3. Providing Interpretive signage and other preservation activities such as printed or electronic media related to San Rafael's history with a particular emphasis on Downtown and surrounding neighborhoods the historic core of the city
4. Providing staff and/or consultant support for HRAC landmark applications supported by the Planning Commission and/or City Council
5. Providing Rehab and Restore Right information on the City's Website for owners and developers
6. Identifying and providing information about incentives for historic preservation
7. Administering a Mills Act program

Rating of Resources

Rather than strict reliance to Secretary of Interior and State Office of Historic Preservation standards, Heritage recommends including consideration of the following:

1. Local landmark designation of community assets
2. Relevancy of a resource to achieving DTPP urban design and place making objectives

Additional Incentives in addition to those noted in the DTPP:

1. Façade easements in addition to the preservation easements noted
2. Local landmark designation to facilitate Mills Act Contracts and access to other incentives
3. Development rights transfer contracts with explicit project tailored preservation and restoration provisions

4. Development bonuses for privately operated public open spaces associated with historic resources and qualified façade and other restorations
5. Air rights development transfer consistent with form based code criteria (such as step backs from street façades); height to conform to the form based codes plus transfer of bulk from the step back area.

Chapter 5

Specific Edits

Note: There are other factual errors in this chapter. We will submit more corrections later.

Page 104 (5-2)

Fig 5.2 (caption)

~~The original 1884 depot that was replaced with a new depot in 1929.~~ The 1929 depot replaced the original 1884 structure.

Page 105 (5-3)

Paragraph 1, Sentence 2

~~Although altered,~~ The depot building that stands today is in the its original station location and still orients orientation to the active rail lines running north and south through San Rafael.

Page 108, Key Issues

Add these bullet points

- Historic buildings important to the local community may be protected as a local landmark, whether or not they qualify for the Secretary of the Interior and the State Office of Historic Preservation (OHP) guidelines.
- Establish an application process for local landmark status, and include a fee schedule with a consideration to accommodate buildings with civic stature

Page 110, paragraph 1

Insert full title and date for prior and current surveys

The City of San Rafael conducted a survey in 1976-1977 and which was published in January 1978 and updated in 1986: *The San Rafael Historical/Architectural Survey Final Inventory List of Structures and Areas*, by Charles Hall Page and Associates and San Rafael City Staff.

Recommend: labeling the different surveys (1978/86 Survey) and (2019/20 Survey) to differentiate between the two.

Pages 111, 113, 116 and elsewhere (5-9)

Fig 5.6

Recommend: The NWPRR Depot is not shown as a resource on all of the maps. Heritage requests that it be included as a resource and rated.

Page 112 (5-10)

Paragraph 2

Centered on the [former] rail line to Petaluma, [this area contains some of the oldest structures in San Rafael, significantly] **this area achieves its significance with the railroad depot building. This area developed** ~~developing~~ almost simultaneously with the denser Downtown Core to its west.

Page 116

Observations: West End Village is mischaracterized as predominantly mid-century. It has a wide range of building ages and architectural styles including many block form buildings with facades at the sidewalk property line. A number of buildings date from the last quarter of the 19th century and most others from the first four decades of the 20th century. The DTPP narrative seems to be focused on a few buildings with setbacks or parking lots along the street (such as Cains Tire, United Liquor and, Guide Dogs for the Blind and Jack Hunt Auto) This isn't the dominant form. A few house form buildings remain from the late 19th and early 20th century. Mid-century and later buildings are the least common building types. As with most of 4th Street extending east to the railroad, the dominant built condition holds the street wall.

Page 117

Observations: Two of the buildings at the northwest corner of 4th Street and E appear to not qualify as "eligible". Heritage proposes to provide additional input on the DTPP, historic resource inventory and context statement in scheduled community outreach by community development staff prior to the Planning Commission meeting scheduled for March 9th to consider the Draft Environmental Impact Report for the DTPP and 2040 General Plan update.

Page 120

Observations: On the establishment of Historic Preservation Commission

1. Consider instead establishing a Historic Resource Advisory Committee (HRAC), appointed by and reporting to the Planning Commission rather than a full commission; this would better manage costs and staff resources. Members should have a direct interest and or expertise in historic preservation and related areas such as architecture, construction and urban design and reflect the community's diversity. The Redwood City HRAC provides a model for San Rafael particularly as it relates to implementation of a DTPP.
2. Staff expertise or an on call historic preservation consultant combined with citizen participation provides more informed decision making, builds local capacity, augments staff resources with volunteer support, and provides elected and appointed officials and staff a better sense of what the community values
3. Role of the HRAC, defined and identified in the DTPP, approved by City Council
 - a) Findings and recommendations on preservation issues
 - b) Voluntary assistance on historic preservation research, community engagement, youth education, walking tours and other events including
 - c) Formulating recommendations for landmark status and historic districts

- d) Increasing community knowledge and innovation in historic preservation and related topics by attending in events and seminars in preservation technology, diversity in historic preservation, finance and incentives and other related topics

Page 121

In many cases buildings identified as nonconforming could be made conforming with appropriate restoration of façades to their period of construction. Heritage believes it appropriate to offer incentives associated with landmark designation to encourage owners to restore building façades in the interest of achieving downtown urban design and place making objectives.

Pages 124-125, Tables 5A-5B

Recommend: Further consideration is needed along with the form based code including refinements following input from the Business Improvement District (BID), Heritage and Chamber of Commerce. Heritage recommends taking a closer look at the Redwood City Downtown Precise Plan with a view toward clarifying and simplifying the building ratings, DTPP guidelines and processes. The intent should be to provide a clear approval path for projects that conform to the guidelines so that they are also in conformance with CEQA and require no further action for certification.

Relocation requirements for contributing “house form resources” appear to be more restrictive than demolition. This is counter intuitive. Compare contributing “house form buildings” to related text for contributing “block form buildings”

Table 5B

Recommend: This table should apply only to development adjacent to resources within historic districts along specific street frontages such as 4th Street or B Street. Otherwise the criteria should only apply to projects resulting in an affirmative response to, “Does the proposed adjacent development result in the resource not being eligible for national register, state landmark or local landmark designation?” A negative response would result in the project not having any additional requirements related to historic preservation. Evolution of context, such as a newer and larger building being constructed adjacent to a smaller scale historic or contributing resource outside of a designated historic district, would not typically impact a resource’s eligibility for designation.

Additional corrections:

There are a number of factual errors in the document. For example on all plans, San Rafael High School is labeled Madrone High School. In the text, the division between the Gateway and Montecito Sub-Areas should be Irwin Street and not Hwy 101.

We will submit further corrections later.