

ALDERSLY RETIREMENT COMMUNITY REDEVELOPMENT PLAN - PROPOSED PROJECT IMPACT ANALYSIS

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[P17150A]

PREPARED FOR ALDERSLY RETIREMENT COMMUNITY
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DRAFT



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I. INTRODUCTION

This Proposed Project Impact Analysis has been prepared for the proposed Aldersly Retirement Community Redevelopment Plan. The proposed project includes the Aldersly Retirement Community property that stretches between Belle Avenue on the north and Mission Avenue on the south and is located a few blocks east of downtown San Rafael. The site contains twelve residential and administrative buildings, built between 1945 and 2004, and a number of landscape features including pedestrian paths and gardens.

The Aldersly Retirement Community site was evaluated with a Historic Resource Evaluation prepared by Page & Turnbull in December 2017 to determine the property's eligibility for the California Register of Historical Resources (California Register) and the San Rafael Historic Properties list.¹ At the time, the site reviewed for the Historic Resource Evaluation did not include a small section in the southeast corner that contains the building at 308 Mission Avenue.² This property was the subject of an Historic Resource Evaluation in October 2020, prepared by Page & Turnbull, that did find that the circa 1942 building at 308 Mission Avenue was not individually eligible as a historic resource for the California Register or the San Rafael Historic Properties list.

The 2017 Historic Resource Evaluation determined that the Aldersly Retirement Community property is eligible for listing as a historic district in the California Register of Historical Resources (California Register) under Criterion 1 (Events) and Criterion 3 (Architecture). The district is eligible under Criterion 1 for its significance as a unique cultural institution for the Northern California Danish-American community, with a period of significance from 1921 to 1980. Under Criterion 3, while no one building was found to be individually significant, the buildings collectively form a district that is eligible for its architecture in three ways: first, for its collection of 1961-1968 buildings by master architect Rex Whitaker Allen, who is known for his mid-century healthcare institutional designs; second, as a collection of buildings that demonstrate the full expression of the Second Bay Tradition style; and third, for its integration of landscape features and building interiors as defined by the Second Bay Tradition and the site's intention as a comfortable retreat and a place for the interaction of its residents and community. As stated in the 2017 Historic Resource Evaluation, "while the historic buildings are the primary components of the eligible historic district, it is the historic relationship of the campus's buildings with the landscape and site topography, and the resulting cohesive nature of the entire property, which forms the basis of the property's eligibility for

¹ Historic Resource Evaluations were also completed in November 2017 for two adjacent properties to the east of the Aldersly campus: 121 Union Street and 123 Union Street. These HREs were completed to inform the Aldersly Retirement Community Redevelopment Plan in its early stages. Neither building was found to be individually eligible for the California Register nor for listing on the San Rafael Historic Properties list.

² Page & Turnbull, *308 Mission Avenue Historic Resource Evaluation*, October 2020.

significance as a historic district.”³ The property is also eligible for the San Rafael Historic Properties list.

The proposed redevelopment project includes demolition or alteration of buildings and landscape features which are contributors to and character-defining features of the California Register-eligible historic district, and construction of three new buildings, including two independent living buildings and one service building that will connect two existing non-contributing buildings.

Methodology

This report includes a summary of the status of the property’s current historic district contributors per Page & Turnbull’s December 2017 Historic Resource Evaluation (HRE), and lists the character-defining features of the eligible historic district. Based on the finding of historic significance in Page & Turnbull’s 2017 HRE, the subject property is a historic resource for the purposes of the California Environmental Quality Act (CEQA), and the proposed project must be evaluated for potential impacts to the historic resource according to CEQA definitions. The project analysis is based on proposed project drawings and renderings dated May 29, 2020, which were provided to Page & Turnbull by Perkins Eastman on August 17, 2020.

³ Page & Turnbull, *Aldersly Retirement Community, 326 Mission Avenue: Historic Resource Evaluation*, December 2017

II. SUMMARY OF HISTORIC RESOURCES

Contributing Historic Resources to the Eligible Historic District

Buildings on the Aldersly Retirement Community property range from one to three stories in height and were constructed from 1945 (Building J – Minor Building) to 2004 (Building I – Rosenberg). The Aldersly Retirement Community was established in 1921 as a non-profit retirement community for Danish-Americans and sought to serve as a cultural center to celebrate Danish history and cultural traditions.⁴ Early buildings on the property, including a Victorian-era mansion, other converted residential buildings, and two 1923 brick buildings designed by local architect Brainerd Jones, were demolished in the mid-twentieth century. The Minor building is the oldest extant building on the Aldersly grounds and was constructed by an unknown architect as a social hall and residence with 18 apartments. The existing campus largely dates to the 1961 master plan for the campus that was designed by Rex Whitaker Allen & Associates. From 1961 to 1968, eight of the existing buildings were constructed (Buildings A through H), creating the cohesive Second Bay Tradition style of the campus that makes the property significant under Criterion 3 (architecture). The remaining three buildings on the current Aldersly campus include the 1992 Building K (Kronborg), the 2004 Building I (Rosenberg), and the building at 308 Mission Avenue, which was constructed as a 1952 residential building. 308 Mission Avenue is located outside the boundary of the eligible Aldersly historic district as it was not a part of the Aldersly campus during the campus' periods of significance.

In addition to the buildings on the Aldersly campus, the eligible historic district contains landscape features, including paths and gardens, and decorative elements such as the mile marker, stone gate pillars, fountain, etc. that illustrate the original and continued approach of creating a garden aesthetic that is a retreat for Aldersly's residents. The word Aldersly translates to “a shade for old age” in Danish and demonstrates the community's longstanding identity as a garden retreat. While some landscape features were called out as character-defining features and are therefore of primary significance to the historic district, a number of other features date to the historic district's period of significance (1921–1980), and are considered contributing features that, while of secondary importance, support the historic significance of the district.

Table 1, which follows, lists the buildings and landscape features of the Aldersly property and defines whether they are contributing or non-contributing elements of the eligible historic district.⁵

⁴ For a full discussion of the history of Aldersly refer to “Section V. Project Site History” within: Page & Turnbull, *Aldersly Retirement Community HRE*.

⁵ For further clarity on which features are contributing please refer to both the Character-Defining Features listed below and the Appendix which shows a map of contributing features (both buildings and landscape features).

Building/Feature	Type	Date Built	Contributing?
Building A – Amalienborg	Building	1963	Yes
Building B – Christiansborg	Building	1963	Yes
Building C – Sorgenfri	Building	Ca. 1968	Yes
Building D – Fredensborg	Building	Ca. 1968	Yes
Building E – Fredericksborg	Building	1961	Yes
Building F – Marselisborg	Building	1966	Yes
Building G – Liselund	Building	1966	Yes
Building H – Graasten	Building	1966	Yes
Building I – Rosenborg	Building	2004	No
Building J – Minor Building	Building	1945	Yes
Building K – Kronborg	Building	1992	No
Entry gate and inscriptions	Landscape Feature		Yes
Main entrance with milemarker and lanterns	Landscape Feature		Yes
Central lawn and views	Landscape Feature		Yes
Main stair	Landscape Feature		Yes
Flagpole	Landscape Feature		Yes
Rose Garden	Landscape Feature		Yes

Character-Defining Features

For a property to be eligible for national, state, or local designation under one of the significance criteria, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. To be eligible, a property must clearly retain enough of those characteristics, and these features must also retain a sufficient degree of integrity. Character-defining features can be expressed in terms of form, proportion, structure, plan, style, materials, and ornamentation. The following character-defining features have been identified for the eligible components of the subject property:⁶

Overall Formal, Spatial, and Visual Relationships of the Historic District

- Spatial integration and interdependency of extant campus buildings, circulation, and topography
- Composition of site with extant administrative, nursing, and community services at center surrounded by residential buildings (independent and assisted living)
- Contrast between densely planted, mature vegetation and gardens with open lawns
- Views and circulation around the 1945 and 1960s residential buildings and main lawn

⁶ Page & Turnbull, *Aldersly Retirement Community HRE*, 62-63.

1960s Second Bay Tradition Buildings

- Simple and modest vernacular appearance
- Wood-framed construction and redwood siding
- Roman brick cladding with linear openings clad with wood siding (painted)
- Large expanses of angled vertically oriented glazing
- Overhanging eaves with wood-paneled soffits and exposed rafter tails
- Low-pitched, canted roofs
- Small-scale and rectilinear emphasis on volume
- Emphasis on indoor-outdoor living spaces
- Landscape features, including pergola, arch, covered outdoor walkway, and trellis

Campus Landscape

- Concrete mile marker, displayed in garden near main entry
- Rose garden and fountain
- Paved circulation paths and ramps with metal railings
- Circular driveway main entry off Mission Avenue
- Mature trees at campus perimeter and adjacent to Main Stair
- Brick main stair with brass lettering, planters, and floral carvings
- Main lawn and views across it
- Front lawn of Frederiksborg (Building E)
- Varied site topography
- Stone entry gate pillars and inscriptions at Mission Avenue

A map of the Aldersly campus, which was included in the 2017 HRE, indicates the age-eligible buildings and landscape features that are considered to be “contributing” and “non-contributing” to the property as an eligible historic district and is included as an appendix. Many of the contributing features correspond to the list of character-defining features above. As explained earlier, contributing features that are not listed as character-defining – namely the flagpole and lanterns at the entrance – are of secondary importance, but were erected during the period of significance and support the historic significance of the district.

III. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The California Environmental Quality Act (CEQA) is state legislation (Pub. Res. Code §21000 et seq.) that provides for the development and maintenance of a high-quality environment for the present-day and future through the identification of significant environmental effects.⁷ CEQA applies to “projects” proposed to be undertaken or requiring approval from state or local government agencies. “Projects” are defined as “activities which have the potential to have a physical impact on the environment and may include the enactment of zoning ordinances, the issuance of conditional use permits and the approval of tentative subdivision maps.”⁸ Historic and cultural resources are considered to be part of the environment. In general, the lead agency must complete the environmental review process as required by CEQA. In the case of the proposed Aldersly Retirement Community Redevelopment Plan, the City of San Rafael will act as the lead agency.

In completing an analysis of a project under CEQA, it must first be determined if the project site possesses a historical resource. A site may qualify as a historical resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a).⁹ The four categories are:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1 (g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

⁷ California Environmental Quality Act (CEQA), *California Legislative Information*, accessed September 15, 2020, http://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=PRC&division=13.&title=&part=&chapter=&article=

⁸ Ibid.

⁹ Ibid.

4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Pub. Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Pub. Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Pub. Resources Code sections 5020.1(j) or 5024.1.

In general, a resource that meets any of the four criteria listed in CEQA Guidelines Section 15064.5(a) is considered to be a historical resource unless “the preponderance of evidence demonstrates that the resource is not historically or culturally significant.”¹⁰

Threshold for Substantial Adverse Change

According to CEQA, a “project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment.”¹¹ Substantial adverse change is defined as: “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.”¹² The historic significance of an historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance” and that justify or account for its inclusion in, or eligibility for inclusion in, the California Register.¹³ Thus, a project may cause an adverse change in a historic resource but still not have a significant effect on the environment as defined by CEQA as long as the impact of the change on the historic resource is determined to be less than significant, negligible, neutral, or even beneficial.

In other words, a project may have an impact on a historic resource, and that impact may or may not impair the resource’s eligibility for inclusion in the California Register. If an identified impact would result in a resource that is no longer able to convey its historic significance and is therefore no longer eligible for listing in the California Register, then it would be considered a significant effect.

In addition, according to Section 15126.4(b)(1) of the Public Resources Code (CEQA), if a project adheres to the *Secretary of the Interior’s Standards for the Treatment of Historic Properties* (the Standards), the project’s impact “will generally be considered mitigated below the level of a significance and thus is not significant.”¹⁴

¹⁰ Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.

¹¹ CEQA Guidelines subsection 15064.5(b).

¹² CEQA Guidelines subsection 15064.5(b)(1).

¹³ CEQA Guidelines subsection 15064.5(b)(2).

¹⁴ CEQA Guidelines subsection 15126.4(b)(1); See Grimmer, Anne E. *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. U.S. Department

IV. ANALYSIS OF PROPOSED PROJECT IMPACTS

This section analyzes the project-specific impacts of the proposed Aldersly Redevelopment Plan on the environment, as required by the California Environmental Quality Act (CEQA). The following analysis describes the proposed project, assesses its impacts on the eligible historic district, and identifies any cumulative impacts.

Proposed Project Description

The proposed project consists of a phased redevelopment of the site that will construct three new buildings and expand two existing buildings. Construction of the project as proposed would require demolition of existing buildings and landscape features as shown in Table 2, below.

BUILDING/FEATURE	TYPE	PROPOSED ALTERATION
Building A – Amalienborg	Building	Demolished
Building B – Christiansborg	Building	Retained and expanded
Building C – Sorgenfri	Building	Demolished
Building D – Fredensborg	Building	Retained
Building E – Fredericksborg	Building	Partially retained; Partially demolished
Building F – Marselisborg	Building	Demolished
Building G – Liselund	Building	Demolished
Building H – Graasten	Building	Demolished
Building J – Minor Building	Building	Demolished
Entry gate and inscriptions	Landscape Feature	Retained in part
Main entrance (at front lawn of Fredriksborg) with milemarker and lanterns	Landscape Feature	Altered and milemarker and lanterns relocated
Circular driveway	Landscape Feature	Altered
Central lawn and views	Landscape Feature	Largely retained ¹⁵
Main stair	Landscape Feature	Retained, new stairs added

of the Interior National Park Service Technical Preservation Services, Washington, D.C.: 2017. September 15, 2020, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>

¹⁵ Footprint of the lawn is largely retained with alterations to the northern edge. The retention of existing views is unclear without renderings of the proposed Western Building.

TABLE 2. PROPOSED ALTERATIONS TO CONTRIBUTING HISTORICAL RESOURCES OF THE ELIGIBLE HISTORIC DISTRICT.		
Note: Buildings and features to be entirely demolished or removed are shaded gray.		
BUILDING/FEATURE	TYPE	PROPOSED ALTERATION
Flagpole	Landscape Feature	Relocated
Rose Garden with fountain	Landscape Feature	Relocated
Paved circulation paths with metal handrail	Landscape Feature	Removed
Mature Trees at Campus Perimeter	Landscape Feature	Many to be removed along interior of Mission Avenue wall

New buildings include the Mission Avenue Independent Living building, the Western Building, and a service building that connects Rosenberg (Building I) and Kronborg (Building K). The Mission Avenue Independent Living building will contain 35 units over four stories with 57,210 square feet total; the building will be located on the site of the existing Marselisborg (Building F), Liselund (Building G) and Graasten (Building H) buildings, and will require the removal and relocation of the Rose Garden (which is located between the three buildings), and the removal and relocation of the flagpole, located directly north of Merselisborg (Building F). The Western Building will contain 15 independent living units over two floors, with a total of 21,850 square feet. It will replace the existing Amalienborg (Building A) and Sorgenfri (Building B) buildings, and will infill a portion of the northwest corner of the central lawn along the northwest of the campus. The service building that connects Rosenberg (Building I) and Kronborg (Building K) will be a single story and will be located in a portion of the property currently occupied by the Minor building (Building J).

The two existing buildings that will be enlarged are Christiansborg (Building B), which will expand four units and renovate two units, and Frederiksborg (Building E), which will renovate four existing units and demolish and rebuild four additional units.

The building at 308 Mission Avenue will be demolished and the area of the building will be used for surface parking. Additional parking added to the site includes the eight spaces of surface parking at the 308 Mission Avenue location, five spaces of surface parking at the main entrance, four spaces in the expanded portion of Frederiksborg (Building E), and nine spaces in the new Mission Avenue Independent Living building.

Other proposed changes to the site include the redesign of the entrance to Aldersly, the expansion of the existing circular driveway, the removal of trees along the Mission Avenue perimeter, and the redesign of the main entrance area in front of Fredriksborg (Building E). The current plan set does not specify details of the redesign, but additional communications with the project team have

confirmed that a number of historic features will be relocated, including the milemarker, lanterns, flagpole, and the rose bushes from the Rose Garden.¹⁶ Locations for these historic features have not yet been determined. Circulation features, which are character-defining features of the eligible historic district, will also be altered. The paved circulation paths with metal handrails will be removed and replaced to meet accessibility requirements, and the brick main stair will be expanded with additional steps to meet the proposed grade change. The historic features of the main steps – metal lettering, planters, and brick material – will be retained. All landscape features of the Aldersly campus that are contributing features of the eligible historic district will be altered in some way, either through relocation, removal, or alteration.

Impact on the Eligible Aldersly Historic District

In order to determine the impacts to the eligible historic district, the proposed changes must be examined for their impacts on the site's significance under both California Register Criteria 1 and 3, as the two criteria for which the site is significant.

In regard to Criterion 1 (Events), the site was found to have a period of significance from 1921 to 1980, encompassing all major periods of the institution's influence as a unique cultural institution for the Northern California Danish-American community. Aldersly was established to provide a destination and shelter for its elderly residents, with its comfortable residential-style atmosphere, and aimed to revive Danish cultural traditions through integrating Danish antiques and memorabilia, hosting events and visiting dignitaries, and serving as a locus of the Danish-American community. Built features of the Aldersly campus that relate to its significance under Criterion 1 include Danish memorabilia and markers of the campus' founding, in addition to the landscape features and buildings that define its residential-style atmosphere. Character-defining features which relate to this criterion include those that support the overall formal, spatial, and visual relationships of the historic district.

The eligible historic district was found to have a period of significance of 1945-1968 under Criterion 3, which relates to the architecture and design of the campus. Through its eligibility under Criterion 3, the campus' Second Bay Tradition style buildings are contributors to the district and their stylistic features are listed as character-defining features. The Minor Building (1945) is also a contributor to the historic district as the building's design influenced the materiality of the 1961 master plan by Rex Whitaker Allen & Associates. As specified in the 2017 HRE, the Second Bay Tradition buildings of the Aldersly campus are significant not as individual buildings, but as a cohesive group that "collectively exhibit a full expression of the Second Bay Tradition style."¹⁷

¹⁶ Email communications with project team on September 17, 2020.

¹⁷ Page & Turnbull, *Aldersly Retirement Community HRE*, 59.

The proposed project anticipates demolition of six of the nine contributing buildings to the eligible historic district. Of the six buildings to be demolished, five are 1961-1968 Second Bay Tradition buildings; the sixth building to be demolished is the Minor Building. Two of the three remaining Allen-designed Second Bay Tradition buildings will be altered through their expansion, and the remaining building (Fredensborg – Building D) will be attached to the new Mission Avenue building at its south façade. The proposed demolitions and alterations will erase the architectural significance of the campus' Second Bay Tradition designed 1961 master plan and will significantly alter its overall spatial relationship of a series of small residential buildings set within a cohesive landscape. The construction of the three new buildings will require the removal and relocation of some landscape features – including the Rose Garden and fountain – and will infill some of the green space of the existing campus, including a corner of the central lawn. All landscape features of the Aldersly campus that are contributing features of the eligible historic district will be altered in some way, either through relocation, removal, or alteration.

Due to the proposed demolition of most contributing buildings and the alteration and relocation of most landscape features as part of the project, the eligible historic district would lose its historic integrity and ability to convey its significance. These alterations would cause a significant adverse change that would result in the loss of California Register eligibility of the Aldersly Retirement Community as a historic district, and therefore the impact on the historic district would be **significant and unavoidable**.

Because the demolition of contributing buildings and changes to landscape features would lead to a loss of California Register eligibility of the Aldersly campus as a historic district, the compatibility or incompatibility of proposed new construction and alterations proposed for the remaining buildings is irrelevant. Additionally, while the project proposes to relocate some character-defining features and contributing elements of the landscape, preserving some aspects of the existing landscape features and design will not lessen the project's impact on the historic district.

Cumulative Impacts

The California Environmental Quality Act defines cumulative impacts as follows:

“Cumulative impacts” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from

individually minor but collectively significant projects taking place over a period of time.¹⁸

The analysis should determine the impact of the related projects and consider the cumulative impacts of the proposed and related projects as they relate to the population of resources that would remain.

All buildings, structures, and landscape features on the Aldersly campus have been evaluated for their historic eligibility in Page & Turnbull's 2017 Historic Resource Evaluation and considered in this Proposed Project Impact Analysis Report. There are no known additional projects that would increase the impacts on the historic resources on the site.

A review of the City of San Rafael Planning Division's Major Planning Projects found only the proposed installation of a small wireless communication facility along the public right-of-way at 304 Mission Avenue to be located near the subject property. The installation of an antenna on top of an existing utility pole – increasing the height from 29 feet to 39 feet – would not impact the Aldersly campus such that it would cause cumulative impacts for the resource.¹⁹

Summary of Proposed Project Impacts

The proposed project for the Aldersly Retirement Community will have a significant and unavoidable adverse impact on historic resources with the anticipated demolition of six contributing buildings, demolition of various character-defining and contributing landscape features, and overall changes to the formal, spatial, and visual relationships that define the eligible historic district. The demolition of the majority of the district's contributing buildings would impair the ability of the site to be able to communicate its historic significance, and while some historic features of the landscape are proposed to be retained or relocated, their preservation would not lessen the impact of the project on the district, and the site would no longer be eligible as a potential historic district.

¹⁸ CEQA Guidelines, Article 20, Subsection 15355.

¹⁹ Beacon Development, *304 Mission Avenue Project Description*. City of San Rafael Planning Division. Accessed September 15, 2020. <https://www.cityofsanrafael.org/304-mission/>

V. CONCLUSION

The Aldersly Retirement Community campus was evaluated in December 2017 by Page & Turnbull and determined to be eligible for listing as a historic district in the California Register of Historical Resources (California Register) under Criterion 1 (Events) and Criterion 3 (Architecture). The Aldersly campus is eligible under Criterion 1 for its history as a unique cultural institution for the Northern California Danish-American community, and under Criterion 3 for its cohesive collection of Second Bay Tradition buildings as envisioned by a 1961 master plan by Rex Whitaker Allen & Associates, and its integration of landscape and built resources that reflects both Second Bay Tradition design and the ideals of Aldersly – which means “a shade for old age” – as a comfortable retreat for its residents. Additionally, Page & Turnbull found that the Aldersly campus is eligible for the San Rafael Historic Properties List.

Based on the 2017 HRE, the Aldersly campus, including eight buildings which are contributors to the Aldersly Historic District, as well as a number of landscape features that are contributors to the district, should be considered a historical resource under CEQA.

This Proposed Project Impact Analysis Report finds that the Aldersly Retirement Community Redevelopment Project would cause a significant and unavoidable impact on the Aldersly Retirement Community Historic District. An Environmental Impact Report (EIR) will be required as the next step in the CEQA process. While the demolition of a historic resource cannot be mitigated to a less than significant level, the EIR may study project alternatives and include historic resource mitigation measures to offset the loss of the historic resource.

VI. REFERENCES

Beacon Development, *304 Mission Avenue Project Description*. City of San Rafael Planning Division. Accessed September 15, 2020. <https://www.cityofsanrafael.org/304-mission/>

California Environmental Quality Act (CEQA), *California Legislative Information*, accessed September 15, 2020, http://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=PRC&division=13.&title=&part=&chapter=&article=

Grimmer, Anne E. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. U.S. Department of the Interior National Park Service Technical Preservation Services, Washington, D.C.: 2017. Accessed June 23, 2020, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>

Page & Turnbull, *121 Union Street: Historic Resource Evaluation*, November 2017.

Page & Turnbull, *123 Union Street: Historic Resource Evaluation*, November 2017.

Page & Turnbull, *Aldersly Retirement Community, 326 Mission Avenue: Historic Resource Evaluation*, December 2017.

VII. APPENDIX

Historic Significance Diagram: Contributors and Non-Contributors to the Eligible Historic District

LEGEND OF BUILDINGS

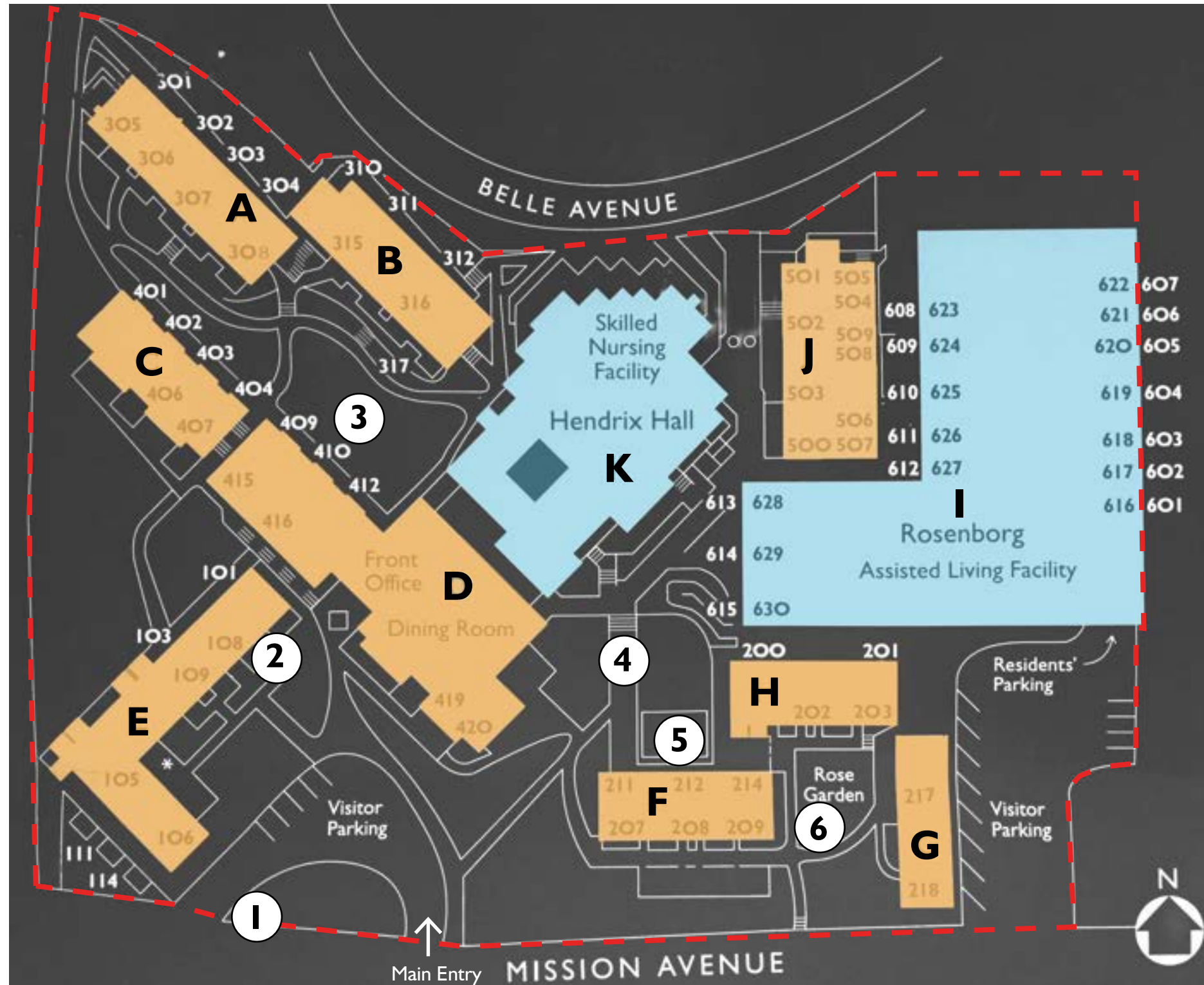
- A-H** 1961-68 Second Bay Tradition Buildings (Rex Whitaker Allen)
- I** 2004 Assisted Living Facility
- J** 1945 Minor Building
- K** 1992 Health Center/ Nursing Facility

CONTRIBUTING FEATURES

- 1** Entry gate inscriptions
- 2** Main entrance with milemarker and lanterns
- 3** Central lawn and views
- 4** Main stair
- 5** Flagpole
- 6** Rose garden

CATEGORIES OF SIGNIFICANCE

- PRIMARY CONTRIBUTING**
Delineates buildings/features that date to the Periods of Significance (POS) and are the most historically significant components of the property
- NON-CONTRIBUTING**
Delineates buildings/features that were constructed after the POS
- DISTRICT BOUNDARY**



Historic Significance Diagram

DECEMBER 2017



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