

## MEMORANDUM

DATE October 25, 2022 PROJECT NO. 17150A  
TO Peter Schakow PROJECT Aldersly Retirement Community  
President of the Board  
OF Aldersly Garden Retirement Community, FROM Barrett Reiter, Architectural  
326 Mission Avenue, San Rafael, CA Historian, Page & Turnbull  
CC Ruth Todd and Christina Dikas, Page & VIA Email  
Turnbull

REGARDING Proposed Cultural Resources Mitigation Measures for Aldersly Draft EIR

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## INTRODUCTION

Aldersly Retirement Community is proposing a project to redevelop portions of their 2.9-acre site at 326 Mission Avenue in San Rafael. The proposed project, which is detailed in the Draft Environmental Impact Report (EIR) (SCH# 2021110398) dated August 2022, will have a significant and unavoidable impact on historic resources at the Aldersly Retirement Community campus. The Aldersly site, which is eligible for the California Register of Historical Resources as a historic district under Criterion 1 (Events) and Criterion 3 (Architecture), will no longer retain its historic significance or historic integrity at the conclusion of the project. For this reason, Page & Turnbull has been asked to prepare Mitigation Measures that can lessen the impact to cultural resources, described as Impact CUL-1. However, the mitigation measures will not reduce those impacts to a less-than-significant level and impacts will remain significant and unavoidable.

## DISCUSSION OF IMPACTS AND PROPOSED MITIGATION MEASURES

As described in the Draft EIR, "The Proposed Project would result in the demolition of six of the nine contributing buildings and landscape features that are contributing features of an eligible historic district." While no mitigation measures can avoid the impact caused by demolition, mitigation measures that document and provide interpretation/commemoration of the resources to be demolished would lessen the impact associated with the proposed project. The following Mitigation Measures are proposed to lessen Impact CUL-1.

### CUL-1a: Documentation

Prior to issuance of demolition permits, the project sponsor shall undertake Historic American Building Survey (HABS)/Historic American Landscape Survey (HALS)-style documentation of the

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property. The documentation shall be funded by the project sponsor and undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth in the Secretary of the Interior's Professional Qualification Standards (Code of Federal Regulations title 36, part 61). The documentation package created shall consist of the items listed below:

- CUL-1a-1: HABS-style Photographs
- CUL-1a-2: HABS/HALS-style Historical Report
- CUL-1a-3: HALS-style Site Plan
- CUL-1a-4: Video Documentation

The documentation materials shall be offered to state, regional, and local repositories, including but not limited to, the Northwest Information Center (NWIC)-California Historical Resource Information System, San Rafael Public Library, the Marin County Free Library's Anne T. Kent California Room, and the Marin History Museum. Materials will either be provided in digital or hard copy formats depending on the capacity and preference of the repository.

#### **CUL-1a-1: HABS-style Photographs**

Digital photographs will be taken of the contributing buildings and landscape elements and the overall character and setting of the eligible historic district. All digital photography shall be conducted according to current National Park Service standards as specified in the National Register Photo Policy Factsheet (updated May 2013). The photography shall be undertaken by a qualified professional with demonstrated experience in documentation photography. Large format negatives are not required. The scope of the digital photographs shall be reviewed and approved by the Planning Division's staff for concurrence.

Photograph views for the data set shall include contextual views of the site and each contributing landscape element and building; elevations of each façade of each building; and detail views of character-defining features. All photographs shall be referenced on a photographic key map or site plan. The photographic key shall show the photograph number with an arrow to indicate the direction of the view.

#### **CUL-1a-2: HABS/HALS-style Historical Report**

A written historical narrative and report will be produced that meets the HABS/HALS Historical Report Guidelines. This HABS/HALS-style Historical Report may be based on the documentation provided in the 2017 Historic Resource Evaluation for the site and will include historic photographs and drawings, if available. The written history shall follow the

standard outline format that begins with a statement of significance for the historic district, describes the architectural and historical context of the district, and includes descriptions of each contributing building and landscape feature.

#### **CUL-1a-3: HALS-style Site Plan**

A HALS-style site plan shall be prepared that depicts the existing sizes, scale, dimensions, and relative locations of the contributing landscape elements and buildings to the eligible Aldersly historic district. Particular attention will be paid to the arrangement and plantings of landscape features that are contributing resources to the eligible historic district. Documentation of all plantings is not required, but depiction of the locations and types of mature trees, and designed hardscape and landscape features will be included.

#### **CUL-1a-4: Video Recordation**

Video recordation shall be undertaken prior to the issuance of demolition permits. The project sponsor shall undertake a video documenting the historic district and its setting. The documentation shall be conducted by a professional videographer, preferably one with experience recording architectural resources. The documentation shall be narrated by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards for history, architectural history, or architecture (as appropriate). The documentation shall include as much information as possible—using visuals in combination with narration—about the materials, construction methods, current condition, historic use, historic context, and historic significance of the historic resource.

The video documentation shall be reviewed and approved by the Planning Division's staff prior to issuance of demolition permits.

### **CUL-1b: Interpretation**

The project sponsor shall provide a permanent display (or multiple displays) of interpretive materials concerning the history of Aldersly in the Northern California Danish-American community and the architectural features of the Aldersly Retirement Community campus as designed in the 1961-1968 master plan by master architect Rex Whitaker Allen. Interpretation of the site's history shall be supervised by an architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards. The high-quality interpretive display(s) shall be installed within the project site boundaries, made of durable, all-weather materials, and positioned to allow for high public visibility and interactivity. In addition to narrative text, the interpretive display(s) may include, but are not limited to, a display of photographs, news articles, memorabilia, drawings, and/or video.

A proposal describing the general parameters of the interpretive program shall be approved by the Planning Division's staff prior to issuance of building permits. The content, media, and other characteristics of the interpretive display shall be approved by the Planning Division's staff prior to issuance of a Temporary Certificate of Occupancy.

### **CUL-1c: Salvage**

Prior to any demolition or construction activities that would remove character-defining features of a resource that is a contributor to the eligible historic district on the project site, the project sponsor shall consult with a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards as to whether any such features may be salvaged, in whole or in part, during demolition/alteration. The project sponsor will submit a list of materials that will be salvaged and reused either on the site or within the interpretive program to the Planning Division for review prior to the beginning of demolition on the site. The project sponsor shall make a good faith effort to salvage materials of historical interest to be utilized as part of the interpretive program. No materials shall be salvaged or removed until HABS/HALS-style recordation and documentation are completed.