

MEMORANDUM

DATE October 25, 2022 PROJECT 17150A
NUMBER
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 Jayni Allsep, City of San Rafael VIA Email
Christina Dikas, Page & Turnbull
Ruth Todd, Page & Turnbull

REGARDING Aldersly Retirement Community – Draft EIR Comment Memorandum

Introduction

The following memorandum has been assembled at the request of the Project Sponsor, Aldersly, Inc., and the City of San Rafael to clarify questions raised during the Planning Commission Hearing held on September 13, 2022 that addressed the Draft Environmental Impact Report (DEIR). This memorandum first addresses a change that was made to the project after Page & Turnbull completed the *Proposed Project Impact Analysis Report* (December 21, 2020). It then provides additional information in response to Commissioner questions and comments about the possible use of Historic Preservation Tax Credits and clarifies the analysis of Preservation Alternative 3.

Proposed Project Revisions

Since the issuance of the *Proposed Project Impact Analysis Report*, one revision to the proposed project that affects the treatment of the historic district was made by the Project Sponsor. As these revisions will not increase the impact of the proposed project on the eligible historic district, they are considered minor and are addressed within this memorandum to clarify the project review record.

The revision of the proposed project since January 2022 includes the retention of Building B (Christiansborg) in its entirety. Previously, the proposed project would have altered the building through an addition to the southwest side of the building. The project revision of retaining Building B without alteration instead of constructing an addition would retain more historic fabric than was originally proposed. With this revision, two of the nine contributing buildings of the eligible historic district would be fully retained without alteration, as opposed to only one building in the previously described proposed project. A revised version of **Table 2: Proposed Alterations to Contributing**

Imagining change in historic environments through
design, research, and technology

Historical Resources of the Eligible Historic District (included in the Page & Turnbull's *Preservation Alternatives Analysis Report* dated January 20, 2022 and reproduced in the DEIR as Table 3-2) is included below with the revised entry for Building B shown in bold.

TABLE 1: PROPOSED ALTERATIONS TO CONTRIBUTING HISTORICAL RESOURCES OF THE ELIGIBLE HISTORIC DISTRICT UNDER THE PROPOSED PROJECT

Building or Feature	Type	Proposed Alteration
Building A - Amalienborg	Building	Demolish
Building B - Christiansborg	Building	Retain¹
Building C - Sorgenfri	Building	Demolish
Building D - Fredensborg	Building	Retain
Building E - Frederiksborg	Building	Alter (partially demolish)
Building F - Marselisborg	Building	Demolish
Building G - Liselund	Building	Demolish
Building H - Graasten	Building	Demolish
Building J - Minor Building	Building	Demolish
Entry gate and inscriptions	Landscape Feature	Alter ²
Main entrance (at front lawn of Frederiksborg) with milemarker and lanterns	Landscape Feature	Demolish (salvage and relocate milemarker and lanterns)
Circular driveway	Landscape Feature	Alter (rearrange)
Central lawn and views	Landscape Feature	Alter ³
Main stair	Landscape Feature	Alter (new stairs added)
Flagpole	Landscape Feature	Alter (relocate)
Rose Garden with fountain	Landscape Feature	Demolish (relocate rose bushes)
Paved circulation paths with metal handrail	Landscape Feature	Remove
Mature Trees at Campus Perimeter	Landscape Feature	Alter (many trees to be removed along interior of Mission Avenue wall)

Note: Buildings and features to be entirely demolished or removed are shaded gray.

Despite the retention of additional historic material at Building B, the proposed project would still demolish or alter seven of the nine contributing buildings and most contributing landscape features of the eligible historic district. Therefore, the proposed project would continue to cause a significant and unavoidable impact on the eligible Aldersly historic district. As the same impact would result

¹ Changed to "Retain" from "Alter (erect addition)."

² Will remain in current location but its elevation will be changed.

³ Footprint of the lawn is largely retained but the retention of existing views is unclear without renderings of the proposed Western Independent Living Building which will define the western edge of the lawn.

with the revised proposed project, no additional analysis of the impacts is required. The eligible historic district would lose its eligibility for the California Register upon completion of the proposed project with or without the retention of Building B.

Historic Preservation Tax Credits

One Commissioner asked a question at the Planning Commission Hearing on September 13, 2022 whether historic preservation tax credits, including the Federal Rehabilitation Tax Credit and the Mills Act program, could be used by the project applicant to provide a financial incentive that supports the retention of the eligible historic district. Both the Federal Rehabilitation Tax Credit and the Mills Act program provide financial relief in the form of a credit on property taxes to property owners who are actively rehabilitating, restoring, or otherwise preserving qualified historic properties.

Aldersly Inc. is a 501(c)(3) tax exempt non-profit organization. It is therefore not eligible to apply for or collect a historic preservation tax credit because it does not pay property taxes.

In some cases, non-profit organizations are able to form partnerships with for-profit organizations that could benefit from the tax credit. However, this would require restructuring the Aldersly organization or partnering with an existing for-profit organization with interest in claiming the tax credit. These partnerships are complicated and involve a level of risk that Aldersly is not planning to undertake.

Analysis of Preservation Alternative 3

One Commissioner raised a question at the September 13, 2022 Planning Commission Hearing during discussion of the DEIR about whether Preservation Alternative 3 was more suitable or preferable to the proposed project. Page & Turnbull analyzed three preservation alternatives in a *Preservation Alternatives Analysis Report* (January 20, 2022), which informed the analysis in the DEIR. Page & Turnbull determined that this alternative would retain nearly all of the historic buildings and landscape elements that contribute to the eligible Aldersly historic district and define its historic significance. As such, Preservation Alternative 3 best preserved the eligible historic district compared to the proposed project or the other two studied preservation alternatives. However, it is less consistent with the Project Sponsor's objectives than either the proposed project or the other two studied preservation alternatives.

Through the CEQA review and EIR process, the environmental considerations (which include the preservation of historic resources) are assessed with the goals of the Project Sponsor. Preservation Alternative 3 illustrates a version of the project that is preferential to the historic resources of the

property, but is not as strong in delivering the Project Sponsor’s key program goals and objectives. For instance, under Preservation Alternative 3, independent living units would be smaller on average, development would not be maximized within Aldersly’s existing development footprint, and there would be an overall reduction of parking spaces. This alternative illustrates the particular difficulty that Aldersly faces in retaining the existing buildings on the site and meeting contemporary standards of elder care and independent living for seniors. **Table 6**, which has been reproduced from the *Preservation Alternatives Analysis Report* (and was also included in the DEIR as Table 5-3), illustrates how Preservation Alternative 3 is the alternative that least meets the Project Sponsor’s objectives in nearly every category.

TABLE 2. ABILITY OF PROPOSED PROJECT AND PRESERVATION ALTERNATIVES TO MEET PROJECT SPONSOR’S OBJECTIVES

Project Sponsor’s Objectives	Proposed Project	Alternative 1	Alternative 2	Alternative 3
●●● <i>Most meets the Objectives</i> ● <i>Least meets the Objectives</i>				
1. Create a financially sustainable community that will last another 100 years	●●●	●●	●●	●
2. Add a second dining venue and resident lounge/gathering spaces	●●●	●●●	●●●	●
3. Create a dedicated Memory Care Center with an accessible outdoor garden area	●●●	●●●	●●●	●
4. Update Independent Living units to attract new residents. Increase number of larger, more marketable units (average unit size in square feet)	●●● (968)	●● (908)	● (830)	● (764)
5. Improve site accessibility and access to campus amenities for staff and residents with various levels of mobility	●●●	●	●●	●
6. Improve entry experience to create a positive first impression	●●●	●	●●	●
7. Define a core active space for residents that promotes social interaction and movement between different parts of the campus	●●●	●●	●●●	●

Project Sponsor's Objectives	Proposed Project	Alternative 1	Alternative 2	Alternative 3
●●● <i>Most meets the Objectives</i> ● <i>Least meets the Objectives</i>				
8. Provide outdoor spaces with lush landscaping to maintain Aldersly's long-time connections to nature and outdoor living, in keeping with the original hygge spirit of the community.	●●	●●	●●	●●
9. Provide additional parking (net number of parking spaces)	●●● (+8)	●● (+6)	●●● (+8)	● (-3)
10. Improve delivery area and back of house spaces to increase efficiency and ease access from Belle Avenue	●●●	●●	●●	●●
11. Maximize Aldersly's footprint, within the limits of the land use and design controls established by the City's planning documents. (total square footage of residential and administrative use)	●●● (138,940)	●●● (139,880)	● (124,880)	●● (133,220)

Qualifications

Page & Turnbull was established in 1973 as Charles Hall Page & Associates to provide architectural and conservation services for historic buildings, resources, and civic areas. The company was one of the first architecture firms in California to dedicate its practice to historic preservation and is among the longest practicing such firms in the country. Offices are located in San Francisco, Los Angeles, Sacramento, and San Jose, and staff includes planners, architectural historians, licensed architects, designers, and conservators. All of Page & Turnbull's professional staff members meet or exceed the Secretary of the Interior's Professional Qualifications Standards as published in the Code of Federal Regulations, 36 CFR Part 61.

Page & Turnbull staff responsible for this memorandum include: Ruth Todd, FAIA, Principal-in-charge; Christina Dikas, Associate Principal, project manager; and Barrett Reiter, Cultural Resources Planner, primary author, both of whom meet or exceed the Secretary of the Interior's Professional Qualification Standards for Historic Architecture, Architectural History, or History.