

City of San Mateo

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Community Development Department, communitydevelopment@cityofsanmateo.org

April 18, 2022

Re: Historic Significance of Baywood Neighborhood and 415 Fairfax Ave.

Dear Planners Busto and Kwan, Deputy Director Dahl, and Director Horrisberger:

On behalf of the Baywood Neighborhood Association, formerly, Baywood Owners Improvement Association, I submit the attached report prepared by historic architecture expert Richard Brandi¹, Historic Preservation Consulting, which evaluates the eligibility of the Baywood Neighborhood under the National Register of Historic Places as a historic district, and his follow-up letter, which analyzes the property at 415 Fairfax Ave. as an individual contributor to the district.

Mr. Brandi's report and letter fill in the analytic gaps in the historic report prepared by "architecture + history, llc" in 2021 for the City of San Mateo's Community Development Department and buttresses the information provided by the California State Office of Historic Preservation in their 1990 letter that characterized neighborhoods west of El Camino as containing "... at least two huge (five hundred + resources) Register-eligible residential districts." (Attached, 1990 letter to City of San Mateo from Kathryn Gualtieri, SHPO.)

Mr. Brandi's determination also conforms with the City's March 10, 2022 response letter to Laurie Hietter from Manira Sandhir, AICP Planning Manager for City of San Mateo, concerning the City's requirement for a historic resource evaluation to be prepared by a licensed historic professional for any structure that has the potential to be a historic resource.

¹ Mr. Brandi is a qualified architectural historian who meets the qualifications Secretary of the Interior's Professional Qualifications for Architectural Historian and Historian. He is a qualified Historic Resources Consultant, San Francisco Planning Department; Adjunct Professor in Historic Preservation, University of San Francisco; and a former Advisor to the City of San Jose Planning Department.

With regard to “historical resources,” the Planning Division, when reviewing Special Use Permits for demolition projects, requires a historic resource evaluation prepared by a licensed historic professional for any structure that has the potential to be a historic resource. The five demolition projects listed in the letter (415, 539 and 542 Fairfax, 564 Edinburgh Street, and 445 Virginia Avenue) are subject to this process and require appropriate CEQA review to determine if the demolition would result in a substantial adverse change in the significance of a historical resource. Given the absence of a designated or eligible district where the referenced demolition projects are proposed, the focus of the City’s CEQA analysis would be on whether the structures proposed to be demolished individually qualify as historic resources.

The Baywood Neighborhood Association has now provided the City with the expert evaluation to enable these qualifying resources to be treated as historic for purposes of CEQA.

Expert Brandi concluded:

The purpose of this report was to assess whether the Baywood study area bounded by Crystal Springs, Eaton, Virginia, Edinburgh, Notre Dame, and the Alameda de las Pulgas appears to be eligible under the National Register as a historic district. Based on this research, the Baywood study area does meet the requirements of a historic district under the criteria A and C of the National Register of Historic Places criteria and does appear to be eligible for listing. Other authorities also concluded that Baywood should or could be considered historic.

Expert Brandi further stated:

Houses in the Baywood study area show a high level of historic integrity. Location, setting, feeling, and association appear unchanged. There are few if any visible alterations that degrade design, materials, or workmanship. Additional research and analysis of the houses is necessary to confirm the degree of historic integrity for individual homes, but it appears that many, if not nearly all, have retained their historic integrity.

In his follow up letter, expert Brandi summarized his findings regarding the eligibility of the Baywood Neighborhood as a historic district.

Baywood meets criterion A for its development as a commuter suburb of San Francisco, as a historic streetcar suburb, and as a historic automobile suburb. Baywood meets the National Register test for historic districts for having a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. Baywood also meets criterion C because it represents a significant and distinguishable entity, the components of which may lack individual distinction. The houses in Baywood reflect the popular revival styles of the 1920s and 1930s,

including Mission/Spanish Colonial Revival, Mediterranean Revival, Tudor Revival, Classical Revival, and Italian Renaissance; and embody the distinctive characteristics of the revival types and method of construction.

Mr. Brandi further determined, in a separate letter of April 4, 2022 (attached), that the house at 415 Fairfax Avenue qualifies as a contributor to the historic district.

Based on the HRE which states 415 Fairfax Avenue “embodies the distinctive characteristics of a Spanish Revival-style,” in my opinion 415 Fairfax Avenue is a contributor to the eligible Baywood Historic District which includes the Spanish Colonial Revival style. It is located within the boundaries of historic district used in my report. The house was built in 1933, placing it within the period of significance (1927-1950). The historic building permits listed in the architecture + history, llc report do not reveal that any exterior alterations were made. The historic photo confirms that the house has not been altered on its primary façade and thus it retains its historic integrity. Therefore, in my opinion, 415 Fairfax Avenue is a contributor to the Baywood Historic District.

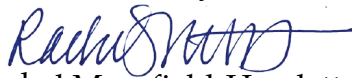
Under CEQA, a project that may cause a substantial adverse change in the significance of an historical resource may have a significant effect on the environment. (Pub. Res. Code §21084.1; CEQA Guidelines, §15064.5.) Based on expert Brandi’s new information, the Baywood Neighborhood and the house at 415 Fairfax Ave. now qualify as cultural resources under CEQA and environmental review must be initiated prior to any consideration of demolition; categorical exemptions may not be used for projects that may cause a substantial adverse change in the significance of an historic resource. (Pub. Res. Code §21084(c); CEQA Guidelines, §15300.2(f).)

Since its passage in 1970, CEQA has included historic properties in its range of protected environmental resources. In 1992, CEQA was amended to clarify protections to historic resources, including a Public Resources Code definition of “historical resources” that provides that a project “that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” (Pub. Res. Code § 21084.1.) The Guidelines were amended in 1998 to include new sections 15064.5 and 15126.4 addressing historic and archaeological resources. An historic resource cannot be approved for a discretionary demolition without preparation of an EIR. (Pub. Res. Code §21084.1; *League for Protection v. City of Oakland* (1997) 52 Cal.App.4th 896.) *League for Protection* held that treatment of a resource as historic does not require prerequisite listing in an official inventory of historic resources or in the California Register of Historic Resources; otherwise,

government inaction or owner resistance could preclude protection of important resources. Guideline section 15064.5(a) defines criteria for qualifying historic resources, provides standards for assessing adverse effects on such resources, and confirms that a substantial alteration of an historic resource that materially impairs historic integrity causes a significant environmental impact.

For the foregoing reasons, the Baywood neighborhood and the home at 415 Fairfax Ave. must now be treated as historic resources subject to CEQA; the application of a categorical exemption is no longer supportable due to the historic resources at stake; and environmental review is required to be conducted that considers alternatives to demolition and adaptive reuse strategies that avoid significant impacts and retain historic resources.

Sincerely,



Rachel Mansfield-Howlett
Attorney for Baywood Neighborhood Association

cc: City of San Mateo
Planning Commission
City Council