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To: Steve Kowalski, Associate Planner, City of Fremont

From: Trina Meiser, Senior Architectural Historian, AECOM

Subject: **Fremont Boulevard Mixed Use Project – *Peer Review of Historic Resource Impact Analysis* and Additional Recommendations for Mitigation Measures**

INTRODUCTION

AECOM Technical Services, Inc. (AECOM) has been retained by the City of Fremont to complete an Initial Study and Focused EIR for the Fremont Boulevard Mixed Use Project (project), proposed by SiliconSage Builders (the applicant). The project site consists of parcels at 37358 through 37494 Fremont Boulevard, 3804 and 3780 Peralta Boulevard, and 37417 Jason Way. The project proposes 72 three-story townhomes, 64 residential apartment units, and approximately 25,000 square feet of retail space along Fremont Boulevard. Outdoor use space is expected to consist of community gardens in the western portion of the site, a pool, BBQ area, and a children's play area near the center of the site.

This technical memorandum summarizes AECOM's peer review of the *37412 Fremont Boulevard Historic Resource Impact Analysis*, prepared by Page and Turnbull, October 17, 2017, which analyzed potential impacts on historical resources resulting from proposed project design Variant A and Variant B. The peer review specifically sought to determine if the existing report can suitably be relied upon for use in the City's Initial Study and Focused EIR, in accordance with the requirements of the California Environmental Quality Act (CEQA), and whether the suggested project improvement recommendations within the report could be supplemented with additional mitigation measures to further reduce potential impacts.

In addition, this technical memorandum assesses potential historic resource impacts of the project variant, included as an alternate option on Sheets 11 and 12 of the revised project plans dated 1/24/2018, which would include demolition of the fire station, and recommends possible mitigation measures to reduce such impacts.

HISTORICAL RESOURCES TECHNICAL ANALYSIS PEER REVIEW

AECOM's peer review includes consideration of:

- The adequacy of the study area and the resultant data collection.
- City policies, standards, guidelines, and regulations, such as the Fremont Municipal Code, General Plan, Climate Action Plan, and Bicycle Master Plan.

- Other applicable standards, guidelines, and regulations, such as the *Secretary of the Interior Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Standards).
- The appropriateness of methodological assumptions and methodologies.
- The rationale and justification for impact significance conclusions.
- The adequacy of identified mitigation measures.
- Reasonably foreseeable development projects for potential cumulative impacts.

The *Historic Resource Impact Analysis* is generally sufficient to support CEQA analysis related to impacts on historical resources; however, additional information with respect to the following items would be necessary for full CEQA review.

1. **Affected Area.** The report should identify a boundary for the affected area (area of potential effects) or a rationale for the delineation of an affected area that would indicate that all potential impacts of the project on potential historical resources are addressed or that the identification efforts of the historical resources discussed is adequate. It appears that the affected area is defined as the project site and the first tier of adjacent buildings, but this is not explained and would be necessary to confirm.
2. **Methodology.** The report should explain how the affected area was reviewed for historical resources. We expect that the typical databases and contacts (e.g., CHRIS search, review of NRHP, CRHR, local register; historical groups or organizations, etc.) were consulted, and that the entire project area was surveyed (the report mentions a site visit to confirm known historical resources), but this should be confirmed and documented. Similar background information on the 2007 survey that led to the DPR form for the fire station and the historic status of adjacent resources would be needed to support the ultimate review of the EIR. In particular, no documentation or DPR forms for the adjacent historical resources or any of the unidentified ineligible resources in the affected area are included in Appendix A of the report.

The impact analysis (Page & Turnbull 2017) concluded that the project would result in significant impacts to the fire station, a historical resource for the purposes of CEQA, because the project as described did not comply with the Standards. The impact analysis assessed two variants for the proposed fire station design (Variant A and B), both of which included similar designs for the interior and exterior of the fire station, with the exception of the eastern façade and retention or replacement of the rear (northern) roll-up garage door. The report provided three design improvement suggestions that would improve the project's compliance with the Standards, but would not fully adhere to the Standards so as to lessen impacts to a level less than significant. Project Improvement Recommendation #1 suggested stylistic and symmetrical changes to the new mixed-use building design to complement the historic character of the fire station. Project Improvement Recommendation #2 suggested changes to the newly exposed east façade of the fire station that would differentiate the new construction from the historic character of the fire station. Project Improvement Recommendation #3 (Variant A only) suggested that a new addition to the east façade be further differentiated from the historic character of the building. These design changes can be included as mitigation measures in the EIR and may reduce direct significant impacts to the fire station; however, the planned demolition of the existing surrounding environment and proposed height

and scale (three stories) of the new buildings adjacent to the fire station would still be found to substantially impact the historic integrity of the fire station's setting.

ADDITIONAL IMPACT ANALYSIS

Since completion of the 2017 impact analysis, the project design has been modified, and a project variant developed. The proposed project includes rehabilitation of the fire station in a manner similar to the Variant B described in the 2017 report. The project variant includes demolition of the fire station.

Proposed Project

The proposed project would develop 72 townhomes, 64 apartments, and approximately 25,000 SF of retail uses, along with a community clubhouse, pool and children's playground, and a community garden, for use by residents and their guests. Retail uses would be located on the ground floor of two buildings (Buildings A and B) fronting Fremont Boulevard, with residential apartments above. These two buildings would be three stories, except for a small portion of Building A fronting Peralta Boulevard, which would be four stories. The townhomes would be three-story structures behind the commercial/apartment buildings (i.e., on the northern portion of the site) along Jason Way and Place. An entry plaza to the project site would be provided approximately half way along the project's Fremont Boulevard frontage and adjacent to the existing fire station building, which would be retained on the site. An underground parking garage would extend below Building B and the entry plaza, with an exit ramp near the eastern end of the garage. The proposed project would adjust the parcel boundary of the fire station site to match the size of the building. The other existing structures on the project site (i.e., the commercial businesses and single residence) would be demolished, and the parcels combined.

The proposed project would seismically upgrade the existing former fire station building in its current location, and rehabilitate/renovate the building for future use, possibly as a restaurant or café, subject to City Council approval. The parcel boundary would be adjusted to match the footprint of the building.

Existing cement plaster on all façades would be retained and repainted. The only exterior changes proposed at the primary (south) façade would be to replace the existing metal pedestrian door and metal roll-up garage door with a metal-framed, fully glazed door and a metal-framed multi-lite garage door, respectively. The transom window above the door and ribbon windows at the second story would be retained. An American flag would also be remounted at the second story (left side) below the roofline.

At the rear (north) façade, exterior alterations would include the removal of the existing metal stairs at the northwest corner, and construction of a new painted metal stair at the opposite rear corner, to access the existing second-story terrace above, and proposed new underground parking garage¹ below. The existing rear metal canopy would be removed, and the existing rear garage door replaced with a new glazed garage door to match the primary façade. No changes to the rear second story are proposed, except minimal changes related to the proposed removal of the existing staircase and connection with the proposed new staircase at the terrace landing.

No changes are proposed to the western façade of the building, except that a climbing vine would be planted in front of the cement plaster portion of the façade. The existing alleyway along the western façade would be retained.

¹ Under the proposed project, the underground parking garage would not extend beneath the footprint of the former fire station building.

The existing building to the east of the former fire station would be demolished, newly exposing the eastern façade. Two sets of metal-framed storefront sliding doors would be inserted along this façade, to provide access from the interior of the building to a seating area within the proposed public entry plaza east of the building. A freestanding wood-framed trellis would be constructed to frame the new doors, and a vertical ladder-like trellis would scale the façade to the left and right of the doors.

In the interior of the former fire station building, the proposed project would retain the existing open fire station apparatus room at the ground story, and the visual and physical connection to the rear of the site. New ADA accessible restrooms would be constructed along the western wall, flanked to the south by the existing stairway and to the north by a new elevator. The existing restroom would be removed. On the second story, the overall configuration of space would not be altered. The fire station would provide approximately 3,300 SF of space.

CEQA Impact Analysis for Historical Resources

Proposed new construction of two three- and four-story multi-use commercial/residential buildings and three-story townhouses would alter the setting of the fire station, conflicting with Standards 9 and 10 [36 CFR § 67.7]). This change to the setting would constitute a substantial adverse change that would impair the significance of the historical resource, and would be considered a potentially significant impact under CEQA. However, implementation of a mitigation measure requiring redesign of the proposed structures directly adjacent to the fire station, as described below (MM-HR 1), would lessen this significant impact.

The rehabilitation of the fire station would constitute a substantial adverse change that would impair the significance of the historical resource, conflicting with Standards 2, 3, and 5 [36 CFR § 67.7]), and would be considered a potentially significant impact under CEQA. However, implementation of a mitigation measure requiring that direct alterations to the fire station adhere to the Standards, as described below (MM-HR 2), would lessen this significant impact.

If **both** MM-HR 1 and MM-HR 2 were implemented to achieve full compliance with the Standards, then the proposed project's significant impacts would be reduced to a less-than-significant level.

If the proposed project cannot be redesigned so that alterations to the fire station and adjacent new construction would comply with the Standards, thereby fulfilling **both** MM-HR 1 and MM-HR 2, then it is recommended that mitigation measures MM-HR 3 and MM-HR 4 be implemented. With the implementation of MM-HR 3 and MM-HR 4, requiring archival documentation and interpretive display, impacts to the historical resource would be reduced, but not to a level of less than significant. As a result, impacts of the proposed project would remain significant and unavoidable.

City of Fremont Planning and Zoning Code Analysis

The proposed project would not meet the Chapter 18.175.220 Guidelines under the Fremont Planning and Zoning Code.

Project Variant

The project variant would develop 72 townhomes, 90 apartments, and approximately 26,000 SF of retail uses, along with a community clubhouse, pool and children's playground, and a community garden, for use by residents and their guests. The portion of the site proposed for townhomes and the community

clubhouse, pool, playground and garden areas would be identical to the layout and development program of the proposed project; the only differences under the project variant pertain to the fire station building and the mixed use portion of the project site along the Fremont Boulevard boundary.

Under the variant, the existing fire station building would be demolished, and proposed Building A would be extended east to include the space occupied by the former fire station building. Above the ground floor, residential apartments on the second and third floors would extend across the entry plaza to connect Buildings A and B, while still allowing vehicular and pedestrian access. The underground parking garage would be extended to the entire length of the combined Buildings A and B, with a second exit ramp at the western end of the garage. Demolished materials would be recycled to the maximum extent practical, to minimize waste and waste disposal costs, and to conform to City demolition waste recycling requirements.

CEQA Impact Analysis for Historical Resources

The demolition of the fire station would constitute a substantial adverse change that would impair the significance of the historical resource. Demolition of a historical resource is usually considered a significant unavoidable impact. Implementation of the mitigation measures described below (MM-HR 3 through 5) would lessen significant impacts, but not to a level of less than significant. As a result, impacts of the project would remain significant and unavoidable.

Fremont Planning and Zoning Code Analysis

The project variant would not meet the Chapter 18.175.220 Guidelines under the Fremont Planning and Zoning Code.

POSSIBLE MITIGATION MEASURES

Both the proposed project and project variant would have potentially significant impacts on historical resources, either directly through demolition of the fire station (project variant) or both directly and indirectly through alterations to the fire station and its setting (proposed project). AECOM has identified the following possible mitigation measures that could be implemented to substantially reduce or lessen adverse changes to historical resources from the proposed project and/or project variant. Measures MM-HR 1 through MM-HR 4 would be applicable for the proposed project; Measures MM-HR 3 through MM-HR 5 would be applicable for the project variant.

For the proposed project, if **both** MM-HR 1 and MM-HR 2 were implemented to achieve full compliance with the Standards, then the proposed project's significant impacts would be reduced to a less-than-significant level and no further mitigation would be required.

If the proposed project cannot be redesigned so that alterations to the fire station and adjacent new construction would comply with the Standards (i.e., if MM-HR 1 and MM-HR 2 cannot **both** be implemented), then it is recommended that mitigation measures MM-HR 3 and MM-HR 4 be implemented. With the implementation of MM-HR 3 and MM-HR 4 impacts to the historical resource would be reduced, but not to a level of less than significant. As a result, impacts of the proposed project would remain significant and unavoidable.

For the project variant, implementation of MM-HR 3 through MM-HR 5 would lessen the significant impacts to historic resources, but not to a level of less than significant.

MM-HR 1: Project Redesign of New Buildings Adjacent to the Fire Station (proposed project only, if feasible)

The project applicant shall revise the design of the new construction immediately adjacent to the fire station to comply with the Standards (36 CFR § 67.7). The design for the new buildings to the east and west of the fire station along Fremont Boulevard shall be revised, with the input of a qualified historic preservation professional, to reduce visual contrasts in scale and height with the historic fire station. Revised plans shall comply with the Standards and shall be submitted to the City's Historical Architectural Resources Board (HARB) for approval.

Possible design revisions to achieve compliance with the Standards (subject to input of a qualified historic preservation professional) could include a reduction in height (to two stories) for the buildings immediately adjacent to the fire station, with closer alignment of second story window heights or rooflines, with some defined horizontal element on the new buildings; revision of the materials palette to be compatible with the historic buildings or historic environment (similar to existing buildings being demolished), such as brick veneer to reference this character-defining feature of the historic building, or employing a more modern design aesthetic for the new construction, including flat roofs or ribbon windows.

MM-HR 2: Project Redesign of Fire Station Rehabilitation (proposed project only, if feasible)

The project applicant shall revise the exterior design of the alterations to the fire station to comply with the Standards (36 CFR § 67.7). Specifically, the plans for the new east façade entrance of the fire station shall be revised, with the input of a qualified historic preservation professional, to be respectful of the historic character of the fire station and distinctive features, yet be clearly differentiated as a new portion of the building. Revised plans for the exterior design of the fire station will comply with the Standards, be verified by a qualified historic preservation professional, and be submitted to the City's Historical Architectural Resources Board (HARB) for approval.

Possible design revisions to achieve compliance with the Standards (subject to input of a qualified historic preservation professional) would require that the addition of brick veneer and cement plaster cladding on the newly exposed east façade be compatible in terms of materiality and style with the original materials, but be clearly distinguished as a new element through its orientation or appearance; and redesign of the new entrance in the east façade to be less prominent as a new feature of the historic building.

MM-HR 3: Archival Documentation (proposed project, if both MM-HR 1 and MM-HR 2 are not met; and project variant)

In consultation with the City of Fremont Planning Division, the project applicant shall document the fire station property prior to alteration, construction activities, removal, or demolition. A detailed archival record of the fire station shall be prepared, so that a record of the significant resource is maintained for public information. Prior to the commencement of construction or demolition activities involving the fire station, professionals qualified under the Secretary of the Interior's Professional Qualifications Standards (in history or architectural history) (36 CFR Part

61) shall prepare archival materials consistent with the standards of the National Parks Service (NPS) Historic American Building Survey (HABS) documentation. The record for the fire station shall be equivalent to HABS Level III documentation and consist of:

1. Sketch plans (illustrating the site plan and exterior elevations of the fire station may be produced in computer assisted drafting (CAD) format, or based on as-built drawings, if available).
2. Archival photographs (large-format negatives, one set of mounted archival prints and one additional set of archival prints, photograph key, and photograph log).
3. Written historical data (including significance statement, narrative building description and historical description), and a sketch map. The materials shall be compiled as a detailed record that reflects the fire station's historical significance.

Following completion of the documentation, the record shall be submitted to the City of Fremont Planning Division for approval. Following completion of the HABS documentation and approval by the Planning Division, the materials shall be placed on file with the City of Fremont, local historical societies, and libraries (including, at a minimum, the Washington Township Museum of Local History and the Fremont Main Library).

MM-HR 4: Interpretative Display (proposed project, if both MM-HR 1 and MM-HR 2 are not met; and project variant)

The project applicant shall create a display and interpretive material to the satisfaction of the City of Fremont Planning Division for public exhibition concerning the history of the fire station and the site. The display and interpretive material, such as a printed brochure, poster, or page for a local history website, could include information from the archival record prepared under MM-HR 3. This display and interpretive material shall be made available to local organizations, the public, and other interested agencies. The City shall be responsible for reviewing and approving the display materials, including the language used for the display.

MM-HR 5: Architectural Salvage (project variant only)

Under the project variant, the fire station building shall be offered for a period of sixty days following certification of the Focused EIR for the price of \$1 to any party willing to move it off the site at their own expense. Should no parties purchase and remove the building, the project applicant shall make historic-period architectural materials that would be removed from the site as part of the project variant available for donation prior to demolition. The materials shall be identified and made available prior to the commencement of demolition activities, to ensure that materials removed do not experience further damage from removal/demolition. No materials shall be salvaged or removed until HABS documentation is completed and an inventory of key exterior features and materials is completed. The materials shall be removed prior to or during demolition. Materials that are contaminated, unsound, or decayed shall not be included in the salvage program and shall not be available for future use or display. The project applicant shall notify various groups via letters, email, notification on the City's website, or public notices posted in newspapers concerning the availability of the salvaged materials and then shall make arrangements for any interested parties to pick up the materials after they are removed from the

structure. The project applicant shall be responsible for storing the salvaged materials for an appropriate period of time, to be determined in conjunction with the project construction schedule.

CONCLUSION

In summary, additional information is needed from the technical analysis to demonstrate that due diligence in the identification of historical resources within an affected area was adequate. The Focused EIR will need to include additional mitigation measures to address significant unavoidable impacts to the fire station as a result of demolition/alteration and/or substantial adverse change to its setting, if the proposed project or project variant is implemented.

For the proposed project, impacts to historical resources could be reduced to a less-than-significant level if both MM-HR 1 and MM-HR 2 are implemented. Otherwise, although proposed mitigation measures MM-HR 3 and MM-HR 4 would reduce impacts, the impacts would not be reduced to less than significant. As a result, the proposed project would still have a significant and unavoidable impact on historic resources, and would require a statement of overriding considerations under Section 15903 of the CEQA Guidelines.

For the project variant, impacts to historical resources could be lessened with implementation of MM-HR 3 through MM-HR 5, but not to a level that would be less than significant. The project variant would therefore have a significant and unavoidable impact on historic resources, and would require a statement of overriding considerations under Section 15903 of the CEQA Guidelines.

REFERENCES

Page & Turnbull. 2017. *37412 Fremont Boulevard Historic Resource Impact Analysis*. Final Report dated October 17, 2017.

Russell, Caroline H. 1990. *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation: HABS/HAER Standards*. Historic American Building Survey/Historic American Engineering Record, Cultural Resource Program, U.S. Department of the Interior, National Park Service. Accessed through <http://www.nps.gov/hdp/standards/standards.pdf>