Exhibit 7 Attachment 9

TREANORHL

MEMORANDUM: HISTORIC PRESERVATION APPROACH DOWNTOWN MOUNTAIN VIEW

DATE: April 28, 2021

PROJECT: Mountain View Downtown Precise Plan Area Historic Resources Survey

HP0857.1901.00

TO: Edgar Maravilla, City of Mountain View

FROM: Kimberly Butt, AIA

ITEM DISCUSSION

1.1 Memo Summary

At the request of the City of Mountain View Planning Department staff, TreanorHL has evaluated the existing local historic preservation regulations relative to the Downtown Precise Plan Sub-Areas A, G, and H. An updated historic resource survey of the downtown commercial district found that although numerous individually eligible historic resources remain in the downtown area, there does not exist a critical mass of historic buildings or sufficient integrity (defined as the ability for an area to convey its significance and evoke a strong sense of past) in order to meet the state or national registers' criteria for the establishment of a historic district.

1.2 Background

Historic Resource Survey Completed in 2003

A historic resource survey report of the downtown area was completed in 2003 by Carey & Co. (now TreanorHL) in association with the development of the Downtown Precise Plan. The 2003 report looked at Precise Plan Areas A-J and identified resources that appeared potentially eligible for listing on the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and the then recently established Mountain View Register of Historical Resources (Mountain View Register). The survey did not identify a commercial downtown historic district eligible for listing in the state or national registers.

Local Register of Historic Resources and Historic Preservation Ordinance

In 2004, the City Council adopted an Initial Register of Historic Resources and a Historic Preservation Ordinance establishing preservation standards and incentives for properties on the local historic register. Both the local register and preservation ordinance remain in place, All listed resources are for individual properties and there are currently no identified historic districts.

Historic Resource Survey Completed in 2008

In 2008, Carey & Co. (now TreanorHL) prepared a citywide survey of historic properties that encompassed the preparation of a historic context statement, a reconnaissance survey of buildings constructed prior to 1960, an intensive survey of 50 properties that appeared eligible for listing in the national and state registers, and a confirmation of previous findings for buildings located within the Precise Plan area. While the report noted there might be the potential for a locally listed residential

district, there was not a commercial downtown historic district identified as eligible for listing in the state or national registers.

Historic Districts

A historic district is generally a defined area containing contributing buildings, structures or sites that together form a historic resource which has been found to be historically significant under local, state or federal criteria.

The National Park Service (NPS) states that "a district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." A historic district is significant when it is clearly an identifiable entity with a well-defined boundary, made up of contributing resources and is found to be historically significant under one the four established criteria. Most typically a district is found significant for its historic associations, with important events or trends (Criterion A/1) or individuals of the past (Criterion B/2), or for its physical attributes or design qualities (Criterion C/3). Also, a district must retain enough attributes and qualities to convey its significance and evoke a strong sense of past – this is referred to as integrity. The criteria previously listed are both for federal (identified alphabetically) and state (identified numerically) listing.

Per the California Environmental Quality Act (CEQA) a historic district and its contributing components are considered historic resources and as such projects should be reviewed if they have the potential to cause a substantial adverse change to the district or its contributors.

1.3 Updated Historic Resources Survey

Historic Resource Survey Draft Completed in 2020

The purpose of the recent 2020 survey was to update the existing historic resource property information and to identify whether there appears to be a downtown historic district eligible for listing as a historic resource on the National Register of Historic Places (NRHP) and/or the California Register of Historical Resources (CRHR). The local register does not define or provide eligibility criteria for the establishment of local historic districts. Local eligibility criteria could be defined through a change to the Historic Preservation Ordinance.

A potential historic district was evaluated centered on Castro Street and defined by Precise Plan Area H. The potential district was found not to appear eligible for the NRHP nor the CRHR, and there is no local policy for designating historic districts within the Mountain View Register.

As noted above, no prior survey work has previously identified a state or nationally eligible commercial historic district in downtown Mountain View. The basis of this finding is not due to a lack of significant history, as the subject area has strong ties to the historical development of Mountain View, but rather it is due to a lack of both a critical mass of remnant historic buildings and an overall loss of integrity. Similar findings have been made about the area by other architectural historians before. A historic resource evaluation prepared by Mark Brack in 1991 for the former United States

¹ National Park Service, *How to Apply the National Register Criteria for Evaluation*, National Register Bulletin 15, (Washington, DC: United States Department of the Interior, 1997), 5

Post Office at 102 Castro Street made the following assessment under the significance evaluation section:

The structure is located on the main commercial street of Mountain View. Castro Street has been the focus of the community since the 19th century. Although a few buildings on the street still preserve elements of the historic appearance, most buildings have been substantially altered within the last 50 years through remodeling and new construction. Due to a severe loss of integrity, this commercial zone would not qualify as a historic district.

After an intensive survey, TreanorHL concurs with the earlier finding regarding the lack of a potential historic district surrounding Castro Street. In making a determination, parameters for the potential district evaluation were set by first establishing a historic context, a period of significance and a physical boundary. The historic context for the downtown commercial district focused on the initial and most significant period of growth around the north end of Castro Street. The period of significance was determined to start at 1861, the beginning of the railroad in town, to c.1950, the date signifying the beginning of the post-war decline of Castro Street as the central business district for Mountain View. The physical boundary was defined by Precise Plan Area H.

There is only a small percentage of existing buildings constructed within the period of significance that maintain integrity (37 buildings out of total available 80 parcels and only 8 of those buildings appear to have sufficient historic integrity to visually convey their historic significance). Around 1950 Castro Street lost its predominant role as the primary commercial center of Mountain View, as the city began to annex more property and car culture began to change the form of commercial development. There have been at least two significant planning initiatives, one in the late-1950s/early-1960s and one in the 1990s, that altered the original Castro Street streetscape greatly. Although there appears to be a context for historical significance related to the initial commercial development of downtown Mountain View, there does not appear to be sufficient integrity remaining for the area to convey its significance and evoke a strong sense of past to the threshold required by the state or national registers.

1.4 Enforcement/CEQA Review and Legal Protections of Local Historic Resources

- The enforcement of local historic ordinances is typically conducted by the zoning administrator and the City Council. Further, as the lead agency for any local development projects involving historic resources, it is the responsibility of City of Mountain View to certify environmental documents that identify any potential impacts and implement any mitigation measures. Only when a project includes federal funding does the State Office of Historic Preservation (SHPO) become involved in the review of projects involving historic resources.
- Locally designated historic resources are presumed to be historical resources under CEQA Section 21084.1 as long as they meet the established requirements for a local register of historical resources:

For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1 [of the Public Resources Code], or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 [of the Public Resources Code], are presumed to be



historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. 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, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 [of the Public Resources Code] shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section.

- Any individually listed historic buildings (listed on national, state or local historical inventories), or any buildings found eligible for listing on the national, state or local inventories, are considered historic resources under CEQA. Therefore, any project involving significant changes to or the demolition of a historic resources would require environmental review, and ultimately, certification of the environmental document by the City.
- One recommendation to enhance the oversight of potential historic resources is to require an applicant to have a historic resource evaluation completed for existing buildings over 45 years old that are included within a proposed project and have an undetermined historical status. This study, which can be recorded on Department of Park and Recreation (DPR) 523 forms, would inform the City as to whether the project involves an eligible historic resource that is not yet listed. This requirement could be included within the Historic Preservation Ordinance and/or within the Precise Plan, if a goal is to limit the requirement to specific area.

1.5 Secretary of the Interiors Standards for Rehabilitation for Reference

Rehabilitation is the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values. The Rehabilitation Standards provide, in relevant part(s):

Standard 1: A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

Standard 2: The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

Standard 3: Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Standard 4: Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Standard 5: Distinctive features, finishes, and construction techniques or examples of fine craftsmanship that characterize a property will be preserved.

Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacements of a distinctive feature, the new feature will match the old in

design, color, texture and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

Standard 7: Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Standard 8: Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures will be undertaken.

Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

Standard 10: New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

END OF MEMORANDUM