

September 1, 2020

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102

Re: 178 Sea Cliff Avenue, Board of Supervisors Hearing

Dear Board of Supervisors,

Page & Turnbull has participated in this project by preparing a Draft Historic Resource Evaluation (HRE) Parts 1 and 2 in August 2017. The San Francisco Planning Department followed our work by preparing an Historic Resource Evaluation Response (HRER) Part 1 in May 2018 and an Historic Resource Evaluation Response (HRER) Part 2 in October 2019.

In our HRE and in the HRER Part 2 by Michelle Taylor, reviewed by Allison Vanderslice, the same conclusion was reached: that the existing residence on this property is not individually eligible for listing in the California Register but would contribute to a potential Sea Cliff historic district. Both our report and the Planning Department's also concluded that demolition of the residence "would not materially impair the eligibility of the [proposed] historic district." One difference between our analysis and the HRER Part 2 is that we found the proposed new residence to be a compatible design "within the setting of the district" and the Planning Department staff found it incompatible. However, since the potential district is the historic resource in question, the key finding was that with the large number of properties within the proposed boundaries that were constructed during the identified period of significance, loss of a single contributing building would not materially impair the potential historic district to the extent that would render it ineligible for listing in the California Register. This is the threshold of impact under the California Environmental Quality Act (CEQA). Planning Department staff determined that because of the small size of the proposed project and the large size and character of the Historic District, the threshold of impact is not met, and a Categorical Exemption is justified.

On June 11, 2020, the San Francisco Planning commission voted to uphold a Categorical Exemption for the proposed residential project at 178 Sea Cliff Avenue, and not to take further environmental or discretionary review.

In an appeal letter dated June 25, 2020, Alicia Guerra of the Buchalter legal office argues that the City's own review of the project indicates that demolition of the existing residence on the subject property, a historic resource, should necessarily call for further environmental review or modification of the proposed project. The appellants have aligned with the Planning Department's finding that the new construction is not compatible with the proposed Sea Cliff Historic District; however, they do not accurately discuss the threshold for impact under CEQA, as described above.

The boundaries of the identified Sea Cliff Historic District are a visible layer on the Planning Department's Property Information Map. Page & Turnbull's Historic Resource Evaluation of 2015 explains that there are

approximately 300 individual properties within the boundaries. Based on the identified period of significance of 1913-1935, there are approximately 230 properties within the boundaries that were built during that time period and are considered potential district contributors.

Visual inspection of the residences throughout the district suggests that the majority of age-eligible buildings as well as the historic district's designed landscape retain good overall integrity and continue to convey the district's significance as a residential park developed during the first half of the twentieth century. In addition, street patterns will be unaffected by the proposed project and will continue to provide changing views and spatial effects.

Thus, the loss of one contributing building will not meet the threshold of cumulative impact, which would render the historic district ineligible for listing in the California Register. The construction of one modern new residence, while affecting setting to an extent on that specific block of the district, also does not meet the threshold for impact.

Ms. Guerra cites two legal cases in support of her claim that a single project can meet the threshold for required environmental review. One of the cases, "Niles v. the City of Fremont (2018)", proposes 98 townhouses to be built on a six-acre site within a historic district. The other case, Georgetown Preservation Society v. County of El Dorado (2018), proposes a Dollar Chain Discount Store to be built on three vacant Main Street lots. Ms. Guerra cites a 'fair argument' that aesthetic effect should be taken into account (and was) in these two cases. Aesthetics, including discussion of the value of traditional vs. modern styles, are not usually the subject of evaluation of proposed new construction under Standard 9 of the Secretary of the Interior's Standards for Rehabilitation, which reads:

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 shall 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. [Emphasis is added. "The property," in this case, would be the entire Historic District.]

This Standard discourages design which imitates earlier styles, as do the City's own Residential Guidelines.

We fully support the Planning Department's conclusions in the Historic Resource Evaluation Response and its CEQA Categorical Exemption Determination concerning Discretionary Review.



Jay Turnbull, Principal
September 1, 2020