



# CATEGORICAL EXEMPTION APPEAL

## 178 Seacliff Avenue

**Date:** September 8, 2020  
**To:** Angela Calvillo, Clerk of the Board of Supervisors  
**From:** Lisa Gibson, Environmental Review Officer – (628) 652-7571  
Florentina Craciun, Senior Environmental Planner- (628) 652- 7510

**RE:** **Planning Record No. 2017-013959APL**  
**Appeal of Categorical Exemption for 178 Seacliff Avenue**

**Hearing Date:** Tuesday, September 15, 2020  
**Attachment(s):** A – 178 Seacliff Avenue Historic Resource Evaluation Response Part 1, Case No. 2017-013959ENV, dated May 4, 2018.  
B- 178 Seacliff Avenue Historic Resource Evaluation Response Part 2, Case No. 2017-013959ENV, dated October 22, 2019.

**Project Sponsor:** Reuben, Junius & Rose, LLP and Page & Turnbull on behalf of Lewis Butler  
**Appellant(s):** Braeden Mansouri on behalf of Mountain Lake Properties, LLC

### Introduction

This memorandum and the attached documents are a response to the letter of appeal to the Board of Supervisors (the Board) regarding the Planning Department’s (the Department) issuance of a categorical exemption under the California Environmental Quality Act (CEQA determination) for the proposed 178 Seacliff Project.

The Department, pursuant to Article 19 of the CEQA Guidelines, issued a categorical exemption for the project on June 11, 2020 finding that the proposed project is exempt from the California Environmental Quality Act (CEQA) as a Class 3 categorical exemption.

The decision before the board is whether to uphold the Department’s decision to issue a categorical exemption and deny the appeal, or to overturn the department’s decision to issue a categorical exemption and return the project to Department staff for additional environmental review.

This memorandum responds to the issues raised in the June 25, 2020 letter of appeal.

## **Site Description and Existing Use**

The project is located at 178 Seacliff Avenue between 26th Avenue, to the east, and 27th Avenue to the west, in the Richmond neighborhood, District 1. The project site is zoned as RH-1(D) Residential House, One-Family Detached and is in a 40-X Height and Bulk District. The project site (Assessor's Block 1306 and Lot 017) is a 42'-6" wide by approximately 172'-4" deep 7,226 square-foot (sf) down sloping lot with an existing 3-story, 3,585 sf single-family house built in 1914. This block of Seacliff Avenue has a prevalent pattern of two- and three-story houses with front and side setbacks. The rear of the buildings on this block face Baker Beach and the outer bay.

## **Project Description**

The project includes the demolition of the existing three-story single-family residence with a detached garage. The proposed project would result in the construction of a new three-story, 8,011-square-foot, 30-foot-tall, single-family residence over basement with three off-street parking spaces. Excavation of 1,600 square feet of site area up to a depth of 15.5 feet, 950 cubic yards would be part of the project.

## **Background**

On October 23, 2017, Lewis Butler filed for Building Permit Application No. 2017.1023.1990 to demolish an existing three-story single-family residence with a detached garage and construct a new three-story over basement single family residence with a two-car garage at the basement level at 178 Sea Cliff Avenue.

On November 19, 2019, the department determined that the project was categorically exempt under CEQA Class 3 – New Construction or Conversion of Small Structures, and that no further environmental review was required.

On January 28, 2020, Mountain Lake Properties (hereinafter "Discretionary Review (DR) Requestor") filed an application with the Planning Department for Discretionary Review (2017-013959DRP) of Building Permit Application No. 2017.1023.1990.

On June 11, 2020, the San Francisco Planning Commission (hereinafter "Commission") conducted a duly noticed public hearing at a regularly scheduled meeting on Discretionary Review Application 2017-013959DRP and declined to take discretionary review on the propose project.

On Thursday June 25, 2020, Braeden Mansouri on behalf of Mountain Lake Properties, LLC (hereinafter appellant) filed an appeal of the categorical exemption determination.

## **CEQA Guidelines**

### **Categorical Exemptions**

In accordance with CEQA section 21084, CEQA Guidelines sections 15301 through 15333 list classes of projects that have been determined not to have a significant effect on the environment and are exempt from further environmental review.

CEQA Guidelines section 15303, New Construction or Conversion of Small Structures, or Class 3, consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to

another where only minor modifications are made in the exterior of the structure. CEQA Guidelines section 15303 provides examples of the types of projects that are exempt under Class 3, including but not limited to: “[i]n urbanized areas, up to three single-family residences may be constructed or converted under this exemption.”

In determining the significance of environmental effects caused by a project, CEQA Guidelines section 15064(f) states that the decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA Guidelines section 15064(f)(5) offers the following guidance: “Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion supported by facts.”

## **Planning Department Responses**

The concerns raised in the appeal letter are addressed in the responses below.

**Response 1:** The Department concluded that the proposed project fits within one of the classes of projects determined not to have a significant effect on the environment, and appropriately prepared a Class 3 categorical exemption under CEQA. The CEQA review adequately analyzed the project’s effects on historic resources and found that the project would not result in a significant impact either at a project or cumulative level. Furthermore, the Department found that project does not trigger the need to prepare an Environmental Impact Report (EIR) per CEQA Guidelines Sections 15064 and 15064.5.

The appellant argues that the project’s potential impacts on historic resources warrants a higher level of environmental review under CEQA. The appellant does not dispute the Department’s finding that the existing structure on the project site is not individually eligible as a historic resource. The appellant also does not dispute the Department’s finding that the existing property on the project site is a contributor to the California Register-eligible Sea Cliff Historic District (District). The appellant disputes the Department’s finding that project development would not result in a significant effect on the District.

According to CEQA sections 21084(a) and (e), categorical exemptions apply to a list of classes of projects that were determined by the Secretary of the Natural Resources Agency not to have a significant effect on the environment. Projects that fit within the classes of projects defined in CEQA Guidelines sections 15300 to 15332 are exempt from additional environmental review under CEQA. However, projects that may cause a substantial adverse change in the significance of a historical resource shall not be exempted from CEQA. Under CEQA section 21084.1, a historical resource for the purposes of CEQA includes, among other things, a historical resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources, as well as a resource included in a local register of historical resources.

The project would not cause a substantial adverse change in the significance of a historical resource for two reasons, as explained in more detail below:

1. The existing building on the project site is not individually eligible for listing on the California Register of Historical Resources, and

2. Although the project site is a contributor to the California Register-eligible Sea Cliff Historic District (District), it would not have a substantial impact on the District.

Therefore, as outlined below, the Department was not precluded from issuing a Class 3 categorical exemption under CEQA for the proposed project due to a significant impact on a historic resource.

The Department's analysis and conclusions are supported by Department records and the findings of the Historic Resource Evaluation (HRE) Part I<sup>1</sup> and Part II<sup>2</sup>.

1. *The existing building is not an individually eligible historic resource, and therefore project actions would not result in a significant impact to historic resources.*

The appellant does not dispute the Department's finding that the subject property is not an individually eligible historic resource. The information included below is a summary of the Department's evaluation process and it provides context for the Department's findings.

The project site is located on the north side of Seacliff Avenue, in the northern portion of Sea Cliff neighborhood, overlooking the Golden Gate and Baker Beach to the immediate north. The surrounding neighborhood consists of large single-family homes predominantly constructed between 1910 and 1930s. The building located at 178 Seacliff Avenue (existing building) was constructed in 1914 by architect Edward G. Bolles in a vernacular mix of Craftsman and Arts and Crafts styles. Based on Department records and the findings of the HRE, Department staff determined that the existing building at 178 Seacliff Avenue is not individually eligible for inclusion on the California Register.<sup>3</sup>

For a property to be considered eligible for listing in the California Register, it must be found significant under one or more of these four criteria: Criterion 1 (Events); Criterion 2 (Persons); Criterion 3 (Architecture); Criterion 4 (Information Potential). As outlined in the Department's HRE Part I, Department staff determined that the subject property is not individually eligible under any of the four criteria, as it is not associated with any qualifying events or persons and does not possess a high degree of architectural interest nor is it a significant example of the work of master architect Edward G. Bolles. Criterion 4 applies mostly to archeological sites and that review was completed by the Department's archeological staff. As such, the proposed project would not result in a significant impact to an individual historic resource and would not trigger an exception to the use of a categorical exemption under CEQA Section 15300.2 (e), Historical Resources.

2. *The Department determined that the existing structure is a contributor to the California Register-eligible Sea Cliff Historic District. However, the Department determined that the project in conjunction with past, current, and future foreseeable projects within the District would not combine to cause a significant impact to the District.*

The appellant disputes the finding that the project development would not result in a significant impact to the California Register-eligible Sea Cliff Historic District. Under CEQA, an EIR is required if substantial evidence

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<sup>1</sup> 178 Seacliff Avenue Historic Resource Evaluation Response Part 1, Case No. 2017-013959ENV, dated May 4, 2018.

<sup>2</sup> 178 Seacliff Avenue Historic Resource Evaluation Response Part 2, Case No. 2017-013959ENV, dated October 22, 2019.

<sup>3</sup> 178 Seacliff Avenue Historic Resource Evaluation Response Part 1, Case No. 2017-013959ENV, dated May 4, 2018.

supports a fair argument that a project may have a significant effect on the environment. (Pub. Res. Code Secs. 2100, 21151, 21080, 21082.2.) A “project with an effect 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.” (CEQA Guidelines Section 15064.5(b).) In this case, the “historic resource” is the California Register-eligible Sea Cliff Historic District. The existing building on the project site was determined to be a contributor to the District, but not individually eligible for inclusion in the California Register.

The California Register-eligible Sea Cliff neighborhood was initially identified by the Department in 2007 as an architecturally cohesive collection of large single-family homes that is part of an early twentieth century residential park development. The District is distinguished from the surrounding Outer Richmond neighborhood by its residential park planning, including the curvilinear street pattern and cohesive architectural character. The neighborhood is entered through distinct columned entrances.

The development of the former Baker Tract, which became the exclusive Sea Cliff residential park, was undertaken by the John Brickell Company, builder and developer Harry B. Allen, and engineer William B. Hoag during three phases of construction between 1913 and 1935. In order to ensure a private and picturesque environment for the new residential development, Hoag designed double roadways with red brick retaining walls, landscaping, and elevated sidewalks and terraced the lots into the hillside. Many of the homes were designed by prominent Bay Area architects such as Willis Polk, Bliss & Faville, Albert Farr, Charles Whittelsey, Edward G. Bolles, George W. Kelham, William W. Wurster, Hyman & Appleton, Earl Bertz, Frederic Nickerson, Bakewell & Weihe, Sylvain Schnaittacher, Matthew V. Politeo, Houghton Sawyer, George McCrea, Warren Charles Perry, and Will H Toepke. These elements combined with the design guidelines for the restricted residence park resulted in a neighborhood with a high level of architectural consistency in terms of scale, setbacks, materials, style, and age as well as unique architect-designed homes. Sea Cliff is an excellent example of the type of restricted residential parks developed west of Twin Peaks in the early 20th century. Following World War II, the remaining vacant properties were sold and developed. Several of these vacant lots were developed with modern buildings that contrasted architecturally with the existing character of the neighborhood.

The Sea Cliff neighborhood was determined by the Department to be a California Register-eligible historic district significant under California Register of Historical Resources Criteria 1 (events) and 3 (architecture) as an excellent example of early twentieth century residential park design. Buildings and ornamentation from the period of significance (1913-1935) were largely executed in French/Mediterranean, Spanish Revival, Edwardian, and hybrid Arts & Crafts/Tudor styles.

Character Defining Features associated with the California Register-eligible District include:

- Bluff-top location in Sea Cliff neighborhood;
- Two- to three-story massing with side setbacks;
- Landscaped front setbacks;
- Mediterranean Revival style features including stucco cladding, gabled and hipped roofs with
- Spanish clay tiles, exterior chimneys;
- Rich Eclectic Revival detailing such as faux quoins, wood shutters, cartouches and balconettes;
- Multi-light wood-sash windows, often with arched openings.

Although not formally surveyed by the Department, the boundaries of the California Register-eligible District identified through the CEQA historic preservation review process are the Presidio of San Francisco, 28th Avenue,

and 30th Avenue to the east; a line along El Camino Drive, Lake Street, and Sea View Terrace to the south; Lincoln Park and Lake Street to the west; and the Pacific Ocean to the north. The District boundaries are closely aligned with the original Sea Cliff residential tract (formerly the Baker Tract), which was developed in three stages between 1913 and 1935. According to Department records, approximately 225 buildings of the roughly 300 buildings within the district were constructed between 1913 and 1935. The remaining approximately 75 buildings were largely constructed in the 1940's and 1950's. The figure below shows the large size of the District and the location of the subject property in the District in blue.



*Figure 1. Project site location within boundaries of California Register-eligible Sea Cliff Historic District*

According to the HRER, Part I, staff determined 178 Sea Cliff Avenue is a contributor to the California Register-eligible Sea Cliff Historic District because the 1914 building dates to the earliest phase of the subdivision's development, contributes to the overall architectural character of the surrounding neighborhood, and retains overall integrity.

After reviewing the proposed project and the character-defining features of the California Register-eligible Sea Cliff Historic District identified above, the Department made the following two determinations: (a) for purposes of CEQA even though the proposed new single-family residential building is not compatible with the District, the proposed demolition and new construction under the project would not result in a significant impact to the



California Register-eligible District; and (b) the project would not result in cumulative impacts to historic resources under CEQA. These two findings are further described below.

*The proposed project would not result in a significant impact to the California Register-eligible Historic District:* This finding was based on the location of the existing residence on the project site in relation to other nearby historic resources, the overall size of the district, and the integrity of the district.

A substantial adverse change is defined as: “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired.” (CEQA Guidelines Section 15064.5(b)(1).) The significance of a historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify or account for its inclusion in, or eligibility for inclusion in a local register of historical resources pursuant to local ordinance or resolution.” Thus, a project may cause a change in a historic resource, but still not have a significant adverse effect on the environment as defined by CEQA, as long as the impact of the change on the historic resource is determined to be less than significant, negligible, neutral or even beneficial. Where the historic resource is a California Register-eligible Historic District, as here, a significant impact would exist if the project would result in a substantial adverse change to the district. After project completion, and as summarized below, the historic District would remain eligible for the California Register as a significant example of early twentieth century residence park design, which reflected the ideals of the City Beautiful movement.

According to the HRER Part 1, the existing 178 Seacliff Avenue residence was identified as a contributing property to the California Register-eligible Seacliff Historic District as one of several residential buildings constructed in a mix of Revival styles in the first tract of residences developed within the Sea Cliff neighborhood. The HRER determined that the 178 Seacliff Avenue building’s location, age, and architectural elements are not distinct, but rather the building’s Craftsman and Arts & Crafts architectural elements contribute to a cohesive collection of similar buildings of the same era. Staff also concluded that although the subject building was designed by Bay Area master architect Edward G. Bolles, who designed several other residences in the Sea Cliff neighborhood, the subject building is a modest example of his work. Other more notable and architecturally distinct properties designed by Bolles include buildings in several notable San Francisco residential parks as well as later multi-family apartment complexes through the 1920s. Therefore, staff determined that the demolition of 178 Seacliff Avenue would not result in a significant impact to the District as the subject building is one of a collection of similar buildings and that the type, period and style of the building would still be strongly represented in the District.

As noted in the Planning Department’s CEQA analysis, while the proposed style of the new construction is not considered compatible with the California Register-eligible Seacliff Historic District, the scale of the building and proposed setbacks are in keeping with the District. The construction of one modern new residence, while affecting the setting to an extent on that specific block of the District, does not meet the threshold for significant impact to historic resources. Additionally, removal and construction of the detached single-family home at the project site allows for physical separation between new construction and neighboring buildings, which further reduces the potential for direct impacts to adjacent potential historic resources. As such, the Department determined that the proposed demolition and new construction would not result in direct impacts to adjacent District contributors and that the District would still express its historical significance as an excellent example of early twentieth century residential park design.

In addition to the CEQA review process, the project also underwent the Department's design review process. The application of Residential Design Guidelines is intended to result in building designs that are compatible with the patterns of existing context, not to necessarily imitate or recreate previous historical styles -- such that a contemporary building can fit aesthetically with the context of older buildings. The Residential Design Review team determined that the massing, composition, materials, proportions and details of the proposed building at 178 Seacliff would be consistent with and a compatible fit with the other buildings in the surrounding neighborhood.

The appellant also submitted a report from preservation consultant Frederic Knapp as evidence that the project may cause a significant impact. (Appeal at p. 3.) However, Mr. Knapp does not conclude that the project would cause a significant impact to the District. The report prepared by Mr. Knapp, while outlining what he describes as design inconsistencies between the proposed project and surrounding structures, which the Department recognizes<sup>4</sup>, concludes the following about the proposed project:

*“even though its size and location would not detract from the consistency and order which characterize the district, most everything else about the design would detract from the unity, continuity, architectural identity, and materiality that characterize the district”*

To conclude, Mr. Knapp encourages further study of potential impacts. The report prepared by Mr. Knapp does not draw an impact conclusion or present any new evidence that would impact the Department's HRER Part I and Part II conclusions or the CEQA significance findings, as Knapp's report does not conclude that the project development would significantly impact the District's eligibility for listing in the California Historic Register.

Based on the evidence summarized above, and after reviewing Knapp's report, the Department continues to find that project development would not result in a substantial adverse change in the significance of a historic resource, and as such would not trigger an exception to the use of a categorical exemption under CEQA Guidelines Section 15300.2.

***The project would not result in cumulative impacts to historic resources:*** Staff findings took into consideration cumulative project impacts within the District. Staff determined that although the design of the proposed new building would not be compatible with all the character-defining features of the District, the project would not result in a significant impact to the overall integrity of the District. As discussed in the Department's review, according to Department records, since 2006 there have been no demolitions of contributing buildings within the boundaries of the District. Additionally, as part of this project review, the Department's preservation staff reviewed all previous projects within the District and confirmed that all but one previously approved project was identified as being compatible with the California Register-eligible Seacliff District and meeting the Secretary of the Interior Standards. Even with project implementation, the District's potential contributors as well as the 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 would remain the same and would continue to provide changing views and spatial effects. Thus, the loss of one contributing building within the California Register-eligible Seacliff District would not meet the threshold of cumulative impact, which would render the historic district ineligible for listing in the California Register. Therefore, the project in conjunction with past, current, and future foreseeable projects within the district would not combine to cause a significant impact to this district.

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<sup>4</sup> 178 Seacliff Avenue Historic Resource Evaluation Response Part II, Case No. 2017-013959ENV, dated May 14, 2018.



Because the project would not materially impact the District's eligibility for listing in the California Historic Register, and because it would not result in cumulative impacts, the project would not meet the conditions set forth in CEQA Guidelines Section 15300.2 for an exception to the categorical exemption. The project is therefore eligible for a Class 3 categorical exemption under CEQA.

**Response 2: The project cannot, by statute, result in a significant aesthetic impact.**

The appellant argues that the project results in a significant aesthetics impact requiring an EIR.

The project cannot, by statute, result in a significant aesthetic impact. CEQA expressly provides that infill residential projects in transit priority areas cannot have significant aesthetics impacts: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (Pub. Res. Code Sec. 21099(d)(1).) Here, the project is infill because it replaces an existing single-family home with a new home, in an urban residential zoning district. The project is in a transit priority area because it is within ½ mile of the 1 and 29 Muni bus lines.

The project also underwent the Department's design review process. The application of Residential Design Guidelines is intended to result in building designs that are compatible with the patterns of existing context, not to necessarily imitate or recreate previous historical styles -- such that a contemporary building can fit aesthetically with the context of older buildings. The Residential Design Review team determined that the massing, composition, materials, proportions and details of the proposed building would be consistent with and a compatible fit with the other buildings in the surrounding neighborhood.

Because of the project's location within an infill site and a transit priority area the project cannot result in a significant impact on aesthetic resources.

## **Conclusion**

The department determined that the proposed project is categorically exempt from further environmental review under CEQA on the basis that: (1) the project meets the definition of one or more of the classes of projects that the Secretary of the Natural Resources Agency has found do not have a significant effect on the environment, and (2) none of the exceptions specified in CEQA Guidelines section 15300.2 prohibiting the use of a categorical exemption are applicable to the project. The appellant has not provided substantial evidence supporting a fair argument that the proposed project would cause a substantial adverse change in the significance of the California Register-eligible Sea Cliff Historic District.

For the reasons stated above and in the categorical exemption determination, the CEQA determination complies with the requirements of CEQA and the project is appropriately exempt from environmental review pursuant to the cited exemption. The department therefore respectfully recommends that the board uphold the CEQA categorical exemption determination and deny the appeal of the CEQA determination.

# Attachment A

178 Seacliff Ave HRER Part I



# SAN FRANCISCO PLANNING DEPARTMENT

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## Historic Resource Evaluation Response

*Date* May 2, 2018  
*Case No.:* 2018-013959ENV  
*Project Address:* 178 Seacliff Ave  
*Zoning:* RH-1(D) (Residential – One Family, Detached)  
P (Public)  
40-X  
*Block/Lot:* 1306/017  
*Staff Contact:* Alexandra Kirby, Preservation Planner  
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*Date of Review:* May 5, 2018

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### PART I: HISTORIC RESOURCE EVALUATION

#### Building and Property Description

The parcel is located on the north side of Seacliff Avenue, in the northern portion of the Sea Cliff neighborhood, overlooking the Golden Gate and Baker Beach to the immediate north. It is located in an RH-1(D) (Residential – Housing, One Family – Detached) Zoning District, and the surrounding neighborhood consists of large single-family homes predominantly constructed between 1910 and the 1930s, although there are a number of notable modern-era residences in the immediate vicinity.

178 Seacliff Avenue was constructed in 1914 by architect Edward G. Bolles in a vernacular mix of Craftsman and Arts and Crafts styles. The building is a stepped three-story wood frame structure clad in stucco with rectangular footprint. A pitched gable roof is set at the front and flat roof set to the rear; a brick-paved driveway leads to a one-story detached garage with a flat roof at the rear of the lot. Fenestration includes a mix of original double-hung wood sash windows with metal balconettes and fixed aluminum windows from a later alteration. The primary façade features asymmetrical fenestration with minimal detailing. The primary entrance is located at the top of a small elevated brick entryway on the east wall facing the brick driveway, and is recessed under a projecting two-story bay with brackets at the base. The rear façade features picture windows in various tripartite layouts overlooking the Pacific Ocean with a rear balcony at the second story.

#### Pre-Existing Historic Rating / Survey

The subject property is not listed on any local, state or national registries. For this reason, the building is considered a “Category B” property (Properties Requiring Further Consultation and Review) for the purposes of the Planning Department’s California Environmental Quality Act (CEQA) review procedures.

### Neighborhood Context and Description

178 Seacliff Avenue is located in the northern portion of the residential Sea Cliff neighborhood, composed of large single-family homes largely constructed between 1910 and the 1930s. The Sea Cliff neighborhood is located at the northwest corner of San Francisco overlooking the Pacific Ocean and the Golden Gate. The Sea Cliff neighborhood is distinguished from the surrounding Outer Richmond neighborhood by its residential park planning, including the curvilinear street pattern and cohesive architectural character. The neighborhood is entered through columned entrances, and the houses are generally similar in massing and style. Buildings and ornamentation were largely executed in French/Mediterranean, Spanish Revival, Edwardian, and hybrid Arts & Crafts/Tudor styles. Development of the neighborhood began after the 1906 Earthquake and Fire which pushed many city residents to the outer lands of San Francisco.

The development of the former Baker Tract, which became the exclusive Sea Cliff residential park, was undertaken by the John Brickell Company, builder and developer Harry B. Allen, and engineer William B. Hoag. The sale of lots in the new neighborhood began in 1913 with later subdivisions occurring in 1916, 1923, and 1928. Buyers of lots within Sea Cliff could either commission their own homes subject to approval by the developer or hire Allen & Company to build them one. Many of the homes were designed by prominent Bay Area architects such as Willis Polk, Bliss & Faville, Albert Farr, Charles Whittelsey, Edward G. Bolles, George W. Kelham, William W. Wurster, Hyman & Appleton, Earl Bertz, Frederic Nickerson, Bakewell & Weihe, Sylvain Schnaittacher, Matthew V. Politeo, Houghton Sawyer, George McCrea, Warren Charles Perry, and Will H Toepke. In order to ensure a private and picturesque environment for the new residential development, Hoag designed double roadways with red brick retaining walls, landscaping, and elevated sidewalks and terraced the lots into the hillside. These elements combined with the design guidelines for the restricted residence park resulted in neighborhood with a high level of architectural consistency in terms of scale, setbacks, materials, style, and age as well as unique architect-designed homes. Sea Cliff is an excellent example of the type of restricted residential parks developed west of Twin Peaks in the early 20th century. Following World War II, the few remaining vacant properties were sold and developed. Several were developed with modern buildings that contrasted dramatically with the existing architectural character of the neighborhood.

### CEQA Historical Resource(s) Evaluation

#### Step A: Significance

*Under CEQA section 21084.1, a property qualifies as a historic resource if it is "listed in, or determined to be eligible for listing in, the California Register of Historical Resources." The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources or not included in a local register of historical resources, shall not preclude a lead agency from determining whether the resource may qualify as a historical resource under CEQA.*

Individual	Historic District/Context
<p>Property is individually eligible for inclusion in a California Register under one or more of the following Criteria:</p> <p>Criterion 1 - Event: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Criterion 2 - Persons: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Criterion 3 - Architecture: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Criterion 4 - Info. Potential: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Period of Significance:</p>	<p>Property is eligible for inclusion in a California Register Historic District/Context under one or more of the following Criteria:</p> <p>Criterion 1 - Event: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Criterion 2 - Persons: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Criterion 3 - Architecture: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Criterion 4 - Info. Potential: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Period of Significance: 1913 - 1935</p> <p><input checked="" type="checkbox"/> Contributor <input type="checkbox"/> Non-Contributor</p>

Based on the information provided in the Historic resource Evaluation Prepared by Page & Turnbull and found in the Planning Department, Preservation staff finds that the subject building is a contributor to the potential historic district, although it does not appear eligible for individual listing.

**Criterion 1: Property is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.**

To be eligible under the event Criterion, the building cannot merely be associated with historic events or trends but must have a specific association to be considered significant. Staff finds that the subject building is not eligible for inclusion on the California Register individually, but it is a contributor to a previously identified eligible historic district under Criterion 1 (Events).<sup>1</sup>

The Sea Cliff residential neighborhood has been previously determined as a potential historic district under Criteria 1 and 3. Sea Cliff exemplifies early 20<sup>th</sup> century "residence park" design, which reflected the ideals of the City Beautiful movement. The period of significance for the neighborhood spans from 1913 to 1935 and is represented by an eclectic mix of Revival architecture styles that have retained a high degree of integrity with few contemporary additions. 178 Seacliff Avenue was constructed as part of the first tract of residences within the Sea Cliff neighborhood and reflects the general pattern of design and massing; therefore, the property appears to be a contributor to the surrounding Sea Cliff district under Criterion 1.

**Criterion 2: Property is associated with the lives of persons important in our local, regional or national past.**

178 Seacliff Avenue was constructed for Eminel P. Halstead and his wife Clara in 1914. Halstead worked at his father's funeral service company, which had been established in 1883 and remained in operation until 1980, when it merged with N. Gray Mortuary. The business is still in operation in San Francisco as the Halstead N. Gray-Carew & English Funeral Directors on Sutter Street. Despite the long operational history, the Halstead business does not rise to the level of historic significance for contributions to the history of San Francisco nor the for the funeral service industry. No persons who have owned or

<sup>1</sup> 330 Sea Cliff Avenue Historic Resource Evaluation Response, Case No. 2010.0967E. May 4, 2011.

occupied 178 Seacliff Avenue appear to have made important contributions to our local, state, or national history. Therefore, 178 Seacliff Avenue is not eligible under Criterion 2 (Persons).

**Criterion 3: Property embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.**

178 Seacliff Avenue does not appear individually eligible for listing in the California Register under Criterion 3 (Architecture) as a property that embodies the distinctive characteristics of a type, period, region, or method of construction. Designed by Bay Area architect Edward G. Bolles, who designed a number of other residences in the Sea Cliff neighborhood including the adjacent property at 170 Seacliff Avenue, the subject building is a modest example of his work. Other properties designed by Bolles include buildings in a number of notable San Francisco residential parks as well as later multi-family apartment complexes through the 1920s.

The property does, however, appear to be eligible as a contributor to the previously identified eligible Sea Cliff Historic District as it was constructed as part of the first tract of development in the neighborhood and reflects that character of the district in massing, design, and materiality. The Sea Cliff neighborhood exemplifies early twentieth century "residence park" design, a neighborhood planning concept that reflected the ideal of the City Beautiful movement. Sea Cliff was established as an exclusive residential neighborhood that was platted in four stages between 1913 and 1928; much of the neighborhood was built out by 1935. The neighborhood design features terraced, curvilinear streets with extensive landscaping. Many properties were constructed by the S.A. Born Company with designs by prominent architects including Bolles. No formal survey of the Sea Cliff neighborhood has been conducted to determine the boundaries of the eligible district to date.

**Criterion 4: Property yields, or may be likely to yield, information important in prehistory or history.**

Based upon a review of information in the Departments records, the subject property is not significant under Criterion 4, which is typically associated with archaeological resources. Furthermore, the subject property is not likely significant under Criterion 4, since this significance criteria typically applies to rare construction types when involving the built environment. The subject property is not an example of a rare construction type.

**Step B: Integrity**

*To be a resource for the purposes of CEQA, a property must not only be shown to be significant under the California Register of Historical Resources criteria, but it also must have integrity. Integrity is defined as "the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's period of significance." Historic integrity enables a property to illustrate significant aspects of its past. All seven qualities do not need to be present as long the overall sense of past time and place is evident.*

The subject property has retained or lacks integrity from the period of significance noted in Step A:

<b>Location:</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks	<b>Setting:</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
<b>Association:</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks	<b>Feeling:</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
<b>Design:</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks	<b>Materials:</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
<b>Workmanship:</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks			



178 Seacliff Avenue retains a high degree of all seven aspects of integrity. No alterations appear to have taken place on the primary building other than repair work and a small number of window replacements, and the detached garage was designed by Edward G. Bolles in 1916 to reflect the design of the primary residence.

**Step C: Character Defining Features**

*If the subject property has been determined to have significance and retains integrity, please list the character-defining features of the building(s) and/or property. A property must retain the essential physical features that enable it to convey its historic identity in order to avoid significant adverse impacts to the resource. These essential features are those that define both why a property is significant and when it was significant, and without which a property can no longer be identified as being associated with its significance.*

The character-defining features of the eligible district include:

- Bluff-top location in Sea Cliff neighborhood;
- Two- to three-story massing with side setbacks;
- Landscaped front setbacks;
- Mediterranean Revival style features including stucco cladding, gabled and hipped roofs with Spanish clay tiles, exterior chimneys;
- Rich Eclectic Revival detailing such as faux quoins, wood shutters, cartouches and balconettes;
- Multi-light wood-sash windows, often with arched openings.

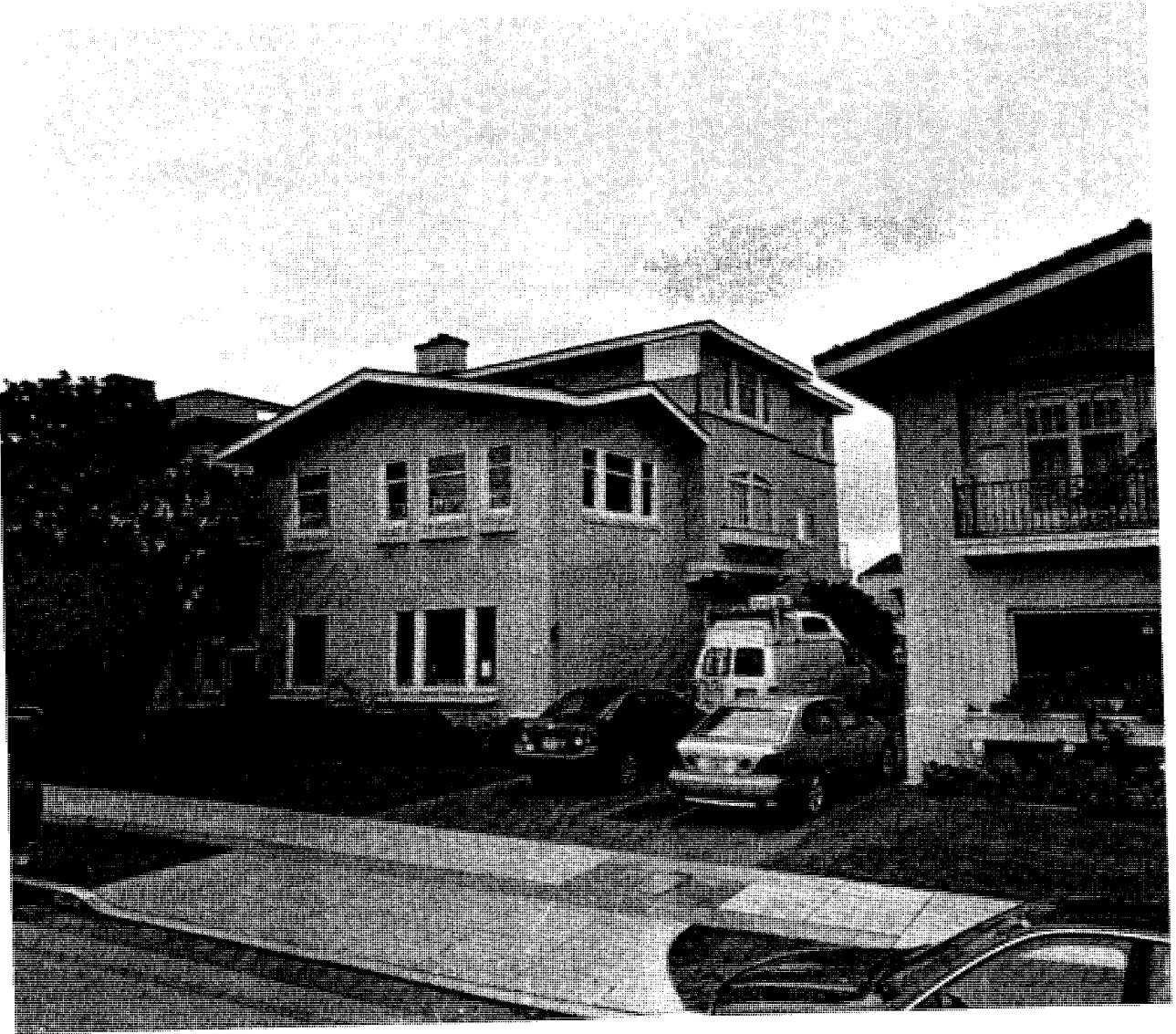
**CEQA Historic Resource Determination**

- Historical Resource Present
- Individually-eligible Resource
  - Contributor to an eligible Historic District
  - Non-contributor to an eligible Historic District
- No Historical Resource Present

**PART I: SENIOR PRESERVATION PLANNER REVIEW**

Signature:   
Pilar LaValley, Acting Senior Preservation Planner

Date: 5/14/18



## Attachment B

178 Seacliff Ave HRER Part II



# SAN FRANCISCO PLANNING DEPARTMENT

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## Historic Resource Evaluation Response

*Date* October 22, 2019  
*Case No.:* 2017-013959ENV  
*Project Address:* 178 Seacliff Avenue  
*Zoning:* RH-1(D) (Residential – One Family, Detached)  
40-X Height and Bulk District  
*Block/Lot:* 1306/017  
*Date of Review:* May 5, 2018 (Part I)  
October 3, 2019 (Part II)  
*Staff Contact:* Michelle Taylor, Preservation Planner  
(415) 575-9197 | michelle.taylor@sfgov.org  
*MEA Planner* Diane Livia, Environmental Planner  
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### PART II: PROJECT EVALUATION

#### Pre-existing Historic Rating/Survey

178 Seacliff Avenue is a single-family residence in the Sea Cliff neighborhood. The subject property was constructed in 1914 and designed by architect Edward G. Bolles in a vernacular mix of the Craftsman and Arts and Crafts architectural styles.

Based on the findings of the HRE Part 1 prepared by Page & Turnbull (dated October 2017), Planning Department staff determined that 178 Seacliff Avenue is eligible for inclusion on the California Register.<sup>1</sup> The subject building is a contributor to the California Register-eligible Sea Cliff Historic District which is significant under Criterion 1/A (Events) and Criterion 3/C (Architecture).<sup>2</sup> The subject property was determined not to be individually eligible for inclusion on the California Register.

The California Register-eligible Sea Cliff Historic District can be summarized as follows:

The Sea Cliff neighborhood is located at the northwest corner of San Francisco overlooking the Pacific Ocean and the Golden Gate Bridge. The Sea Cliff neighborhood is distinguished from the surrounding Outer Richmond neighborhood by its residential park planning, including the curvilinear street pattern and cohesive architectural character. The neighborhood is entered through columned entrances, and the houses are all similar in massing and style. Buildings and ornamentation were largely executed in French/Mediterranean, Spanish Revival, Edwardian, and hybrid Arts & Crafts/Tudor styles. Development of the neighborhood began after the 1906 Earthquake and Fire which pushed many city residents to the outer lands of San Francisco. The development of the former Baker Tract, which became the exclusive Seacliff residential park, was

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<sup>1</sup> 178 Seacliff Avenue Historic Resource Evaluation Response Part 1, Case No. 2017-013959ENV, dated May 5, 2018.

<sup>2</sup> 26 25th Avenue Historic Resource Evaluation Response, Case No. 2005.0229E., dated May 1, 2007 and 330 Sea Cliff Avenue Historic Resource Evaluation Response, Case No. 2010.0967E., dated May 4, 2011.

undertaken by the John Brickell Company, builder and developer Harry B. Allen, and engineer William B. Hoag. The sale of lots in the new neighborhood began in 1913 with later subdivisions occurring in 1916, 1923, and 1928. Buyers of lots within Sea Cliff could either commission their own homes subject to approval by the developer or hire Allen & Company to build them one. Many of the homes were designed by prominent Bay Area architects such as Willis Polk, Bliss & Faville, Albert Farr, Charles Whittelsey, Edward G. Bolles, George W. Kelham, William W. Wurster, Hyman & Appleton, Earl Bertz, Frederic Nickerson, Bakewell & Weihe, Sylvain Schnaittacher, Matthew V. Politeo, Houghton Sawyer, George McCrea, Warren Charles Perry, and Will H Toepke. The eligible historic district has a period of significance of 1913 to 1935.

The character-defining features of the eligible district include:

- Bluff-top location in Sea Cliff neighborhood;
- Two- to three-story massing with side setbacks;
- Landscaped front setbacks;
- Mediterranean Revival style features including stucco cladding, gabled and hipped roofs with Spanish clay tiles, exterior chimneys;
- Rich Eclectic Revival detailing such as faux quoins, wood shutters, cartouches and balconettes;
- Multi-light wood-sash windows, often with arched openings.

Although not formally surveyed, the boundaries of the eligible district are irregular but would likely be the Presidio of San Francisco, 28<sup>th</sup> Avenue, and 30<sup>th</sup> Avenue to the east; a line along El Camino Drive, Lake Street, and Sea View Terrace to the south; Lincoln Park and Lake Street to the west; and the Pacific Ocean to the north.

Proposed Project

Demolition

Alteration

Per Drawings Dated: 1/21/2019

### Project Description

The proposal is to demolish an existing 4,479 square-foot, three-story over basement, single-family residence to allow for the construction of a new 8,066 square-foot, three-story over basement, single-family residence.

### Project Evaluation

*If the property has been determined to be a historical resource in Part I, please check whether the proposed project would materially impair the resource and identify any modifications to the proposed project that may reduce or avoid impacts.*

### Subject Property/Historic Resource:

- The project will not cause a significant adverse impact to the historic resource as proposed.
- The project will cause a significant adverse impact to the historic resource as proposed.

**California Register-eligible Historic District or Context:**

- The project will not cause a significant adverse impact to a California Register-eligible historic district or context as proposed.
- The project will cause a significant adverse impact to a California Register-eligible historic district or context as proposed.

**Project Impacts**

Planning staff has reviewed the proposed project at 178 Seacliff Avenue and determined the demolition of a contributing property within the historic district will not materially impact the California Register-eligible Sea Cliff historic district. Additionally, staff has determined that although the proposed new single-family residence is not compatible with the district, the proposed design will not materially impair the eligible historic district.

The project proposes to demolish the existing 1914 single-family home and construct a new three-story over basement detached single-family home in a modern style, using modern finishes and detailing. The new building will be comprised of a two-story boxed volume cantilevered above a recessed ground floor, allowing the building to appear as if it is floating. The modern style of the building is further emphasized through the use of a simple flat roof, stacked Indiana textured stone cladding offset by smooth stone fascia belt courses and coping. The geometric language of the building will be further expressed with large rectangular, floor to ceiling openings comprised of both clear anodized-aluminum frame windows and large recessed balconies with glass guardrails. A concrete drive at the side (east) elevation provides access to the entrance and a subterranean garage entry hatch.

Although the height and footprint of the proposed building are consistent with the pattern of development of the neighborhood, the overall design of the building is not compatible with the character of the eligible district. The new building will not incorporate design elements identified as character defining to the Sea Cliff historic district, such as stucco cladding, gabled and hipped roof with Spanish Clay tiles, exterior chimneys, and multi-light wood-sash windows. Instead, the proposed modern massing, expressed with a two-story box form above a recessed glass base, contrasts with the traditional massing and sloped roofs common to Revival styles. Additionally, the proposed textured cladding materials of the stacked stone and smooth stone fascia, will be at odds with the smooth stucco finish featuring ornamental detailing common to this neighborhood. Furthermore, the expansive fenestration and abundant use of glass on the proposed building is inconsistent with the pattern of wood-frame, multi-light windows. The modern pattern of openings is further contrasted with the introduction of recessed balconies and glass railings. As proposed, the new building introduces new materials and modern forms that are not compatible with the historic character of the eligible historic district.

**Cumulative Impacts**

The geographic scope, or cumulative study area, for cumulative historic architectural resource impacts includes the project site and eligible Sea Cliff historic district.

Staff finds that the demolition of 178 Seacliff Avenue and construction of the proposed project would not result in a cumulative impact to the California Register-eligible Sea Cliff Historic District. Although the design of the project will not be compatible in massing, materials or details with nearby historic resources,



the physical separation between new construction and such resources reduces the potential for direct impacts. Furthermore, although the proposed project may alter the setting of the California Register-eligible Sea Cliff Historic District, the overall integrity of the district will not be affected by the project.

Since identified as an eligible historic district in 2006, all but one project in the area has conformed with the Standards.<sup>3</sup> Furthermore, since 2006, there have been no demolitions of contributing buildings within the boundaries of the eligible district. Of the active planning cases within the cumulative study area, there is one proposed project that is pending review.

Even when taking into account the proposed demolition and new construction of the subject property, combined with the previously non-conforming project within the boundaries of the district, Planning Department preservation staff do not find that there would be a significant cumulative impact to the historic district.

## **PART II: PRINCIPAL PRESERVATION PLANNER REVIEW**

Signature: Allison K. Vanderslice Digitally signed by Allison K. Vanderslice  
Date: 2019.11.04 22:52:33 -06'00'  
*Allison Vanderslice, Principal Preservation Planner*

Date: \_\_\_\_\_

cc: Environmental Planner, Diane Livia  
Project Planner, Sylvia Jimenez

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<sup>3</sup> See 2840 Lake Street Historic Resource Evaluation Response and Categorical Exemption, Case No. 2015-013369ENV.