

# 178 Seacliff Ave. Discretionary Review Appeal San Francisco Board of Supervisors

PRESENTED BY

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## **ALICIA GUERRA**

SHAREHOLDER

BUCHALTER

415-227-3508

AGUERRA@BUCHALTER.COM

## **FREDERIC KNAPP**

KNAPP ARCHITECTS

(415) 986-2327

KNAPP-ARCHITECT.COM

# Why are we here?

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- S.F. Muni Code, Art. 1, Sec. 26(a) and City Attorney Opinions 845 and 79-29 authorize the Commission to exercise DR in ***exceptional or extraordinary cases that impact the public interest***
- Exceptional and extraordinary circumstances include violations of State Law.
- We presented a **fair argument** that the Project materially impairs the Seacliff Avenue Historic District thereby resulting in a significant impact under CEQA.
  - The City never fully defined the boundaries, prepared a context statement or identified contributing and non-contributing structures so we don't know just how significant the impact is due to the Project's replacement of a compatible contributor with an incompatible building.
- No effort was made to mitigate the impacts nor was any attempt made to redesign the house to be compatible with the eligible Historic District per the City's Design Guidelines and the Secretary of Interior Standards.

# Planning Commission Ignored Project Impacts

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- The Planning Commission approved the project despite a fair argument of significant CEQA impacts.
  - There is a substantial adverse change to the **significance of a historical resource**.
  - The **cumulative impact** of successive similar projects in the same place over time.
- If any of these *exceptions* to the categorical exemptions applies, project is not categorically exempt from CEQA but is subject to further environmental review.
- Project impacts can be considered less than significant if project conforms to Secretary of the Interior's Standards for the Treatment of Historic Properties
  - This project does not.

# This Project Contributes to a Significant Cumulative Impact

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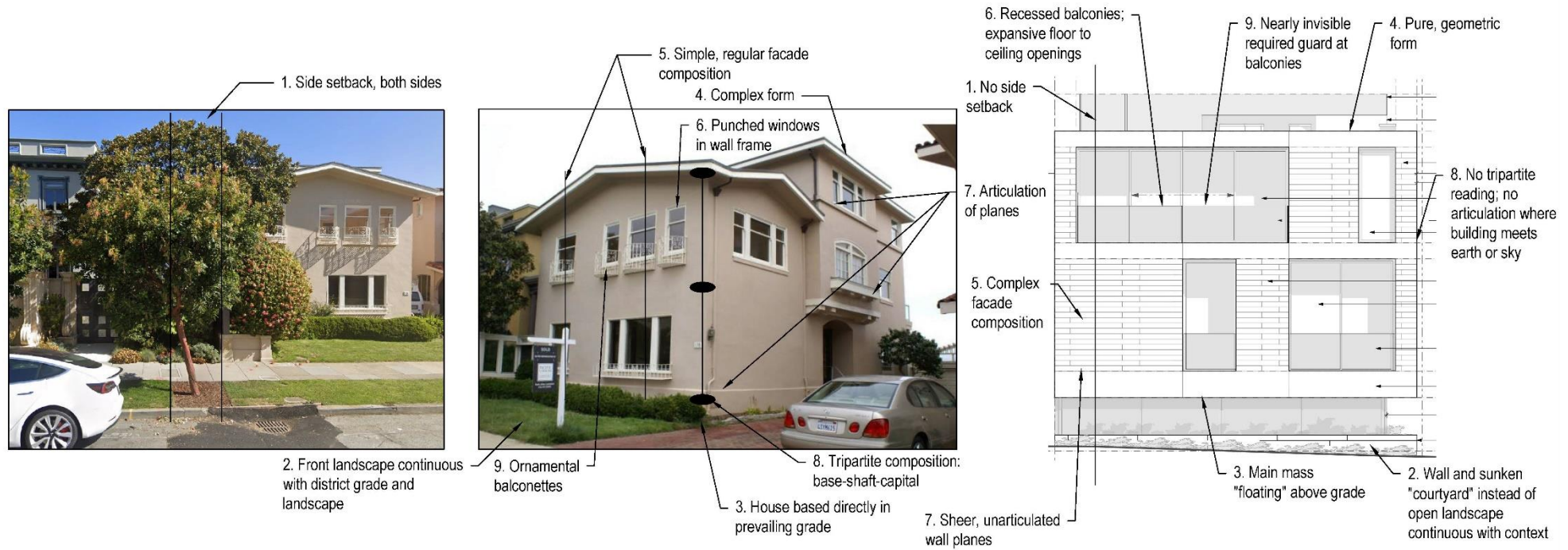
- The Board of Supervisors must consider the combined impact of 178 Seacliff with the other existing nonconforming Butler structure in Sea Cliff.
- The existing house was designed by one of the very architects that gave rise to Sea Cliff being a potential historic district in the first place.
- The Project would not demolish an incompatible house and replace it with an incompatible house. It would not demolish a compatible house and replace it with another compatible house. This Project demolishes a compatible house and replaces it with an incompatible house whose material impairment on the district causes an adverse cumulative impact.
- City Planning's cumulative impact analysis is flawed claiming this demolition is permissible because there have been no prior demolitions
- Cumulative impacts analysis must also be *forward-looking*—ask if similar ***future demolitions*** would affect the Sea Cliff Historic District.

# This Project Must be Subject to the Same Standards as Others

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- Why would the City designate Sea Cliff as an eligible historic district if it will not protect it?
- Demolition of 178 Sea Cliff and construction of the new modern house jeopardizes the integrity of the historic district because the new house compromises the existing homes of the same historic period.
- When viewed within the context of the initial Sea Cliff tract, the Project may impair the Historic District and cause significant cumulative impacts. (e.g., 1 of 4 buildings is not the same thing as 1 of 300 buildings)
- We ask the Board to send the Project back to the drawing board to require that it comply with the same standards as others to lessen historic resources impacts.

# Incompatible Elements



1 Existing South Elevation  
SCALE: 1/4"

2 Existing Southeast Elevation  
SCALE: 1/4"

3 Proposed South Elevation  
SCALE: 1/8"

<p><b>KNAPP ARCHITECTS</b></p> <p>99 Mississippi Street Second Floor San Francisco, CA 94107</p>	<p>178 Sea Cliff Avenue</p> <p>Evaluation of the Proposed Design and Historic District Characteristics</p>	<p>Date June 2020 Scale</p>	
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# Compatibility and Impact



④ SOUTHWEST - EXISTING



② SOUTHWEST - PROPOSED



90 Sea Cliff



120 Sea Cliff



③ SOUTHEAST - EXISTING



① SOUTHEAST - PROPOSED

Four examples of projects which were designed to achieve greater compatibility



98 Sea Cliff



2825 Lake