



14 September 2020

The Hon. Norman Yee, President  
Board of Supervisors of the City and County of San Francisco  
Clerk of the Board of Supervisors  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102-4689

**Re: Categorical Exemption for 178 Sea Cliff Drive**

Dear President Yee and Supervisors;

This letter lays out several concerns about the categorical exemption the Planning Department has approved for demolition of 178 Sea Cliff Avenue and construction of a new, larger, modern house on the site. It is offered in addition to the analysis our firm previously submitted which demonstrates that the proposed design is not compatible with the eligible Sea Cliff Historic District. The City and County of San Francisco's reliance on a categorical exemption to exempt the 178 Sea Cliff Avenue Project from environmental review under the California Environmental Quality Act ("CEQA") has not addressed several serious issues of concern. Most of these relate to the fact that the historic district has never been officially designated: there are no boundaries, no context statement, and no list of contributing properties. The lack of complete and definitive information about the eligible historic that would be affected by this project mandates careful documentation and analysis, and leaves little room for conclusions reached on hunches or generalizations. Although there is documentation in the project file, the conclusion that there would not be a significant impact is based on overly broad assumptions which are founded on inadequate documentation and limited analysis.

The following are additional concerns the Board of Supervisors should take into consideration in deciding whether it is appropriate to short-circuit CEQA analysis based on the limited analysis produced up to this time:

**The conclusion there would be no significant impact on the district is based on misunderstanding of the role of non-contributing buildings in a historic district.**

The description in the Page & Turnbull HRE Part 1 (pages 19-21) paints the Sea Cliff Historic District as an evolving and open-ended group of architectural styles and eras, apparently united only by size or use or siting.

"Although the neighborhood had largely been built out in the decades prior, some new buildings were constructed in Sea Cliff through the 1970s and 1980s...These new buildings continued to express the contemporary architectural trends of the day; Post-Modern, Abstract, and Structuralist designs were peppered throughout the neighborhood, increasing the variety of architectural styles in Sea Cliff. In addition, some of the pre-existing properties were remodeled to reflect the shifting architectural preferences, both in historicist and modern-inspired traditions. This trend of remodels and alterations has continued through to the present day."

Its list of post-1930 buildings in Sea Cliff includes one (890 Sea Cliff Avenue) that is clearly outside the boundary shown on the Planning Department's map of the historic district. But the non-contributing buildings that are clearly within the boundaries are a greater concern. The core concept of a historic district is that the properties have shared significance; by contrast, a contiguous collection of historically important properties which do not have anything in common is not a district.

The Planning Department's HRE Part 1 concludes that the period of significance for the Sea Cliff Historic District is 1913 to 1935. This means that any building constructed after 1935 does not contribute to the significance of the district. The list of houses newer than 1935 in the HRE is factual—they exist as stated—but these houses do not characterize the district under the National Register Criteria or the California Register Criteria, and their presence in the district does not in any way diminish the impact that would be caused by demolishing the 1914 house at 178 Sea Cliff Avenue and replacing it with a design that is not compatible with the historic district. Compatibility depends on whether a proposed design would fit in with the *historic* buildings in a district, given that the existing 1914 house is in fact a contributor. The reasoning in both the HRE by Page & Turnbull and the HRER Part 2 from the Planning Department that past construction of incompatible buildings means that no impact would come from additional construction of another incompatible building is not supported by the National or California Register Criteria, the Secretary's Standards for the Treatment of Historic Properties, or the CEQA Guidelines.

The basic notion of a historic district is that it showcases a specific aspect of history—and is tied to a defined era, the period of significance. New construction must not dilute the ability of the district to convey its character from the period of significance. A common complaint of detractors is that designating a district will “freeze it in time”—and that is true to the extent that new construction cannot be allowed to change the identity of the district. If everyone could demolish and build at will in a historic district “to reflect the shifting architectural preferences,” nothing would differentiate a historic district from last year's redevelopment area.

**Other properties and projects in the district have met a far higher standard for historical resources than the proposal for 178 Sea Cliff Avenue.**

A brief windshield survey, focused primarily on the first phase of Sea Cliff (which includes the subject property), followed up by online research on selected properties in the San Francisco Property Information map, indicates that most houses which have been remodeled or enlarged in this century are still compatible with the Sea Cliff Historic District. For example, four properties appear compatible and have permits from 2008 or later:

- 90 Sea Cliff Avenue (2008)
- 98 Sea Cliff Avenue (2003-11)
- 120 Sea Cliff Avenue (2009-2017)
- 2825 Lake Street (2010)

One property has new construction (replacing an older house) and is compatible:

- 222 El Camino del Mar (1999).

One property has a relatively recent permit and does not appear compatible with the district, though the Property Information Map says it was built in 1923:

24 25<sup>th</sup> Avenue (2014)

These observations are preliminary and were not confirmed by detailed permit searches. Nonetheless, they show that most permitted work in the district has been compatible with its historical character. This is consistent with the Planning Department's own analysis of the structures in the District as summarized in the Planning Department Memorandum Regarding the Mountain Lake Properties Appeal Dated September 8, 2020. This raises the question of why these projects were designed to avoid impacts on the district, while the Planning Department issued a Categorical Exemption for the proposed project design at 178 Sea Cliff Avenue (without application of the Secretary of the Interior's Standards)—which the Planning Department acknowledges is not compatible with the District.



1938 aerial view from Google Earth. North is up. Red arrow marks 178 Sea Cliff.

**The boundaries of the district—and the phases of Sea Cliff's development—have not been given due consideration**

The HRE and the HRER note that Sea Cliff was platted in four phases; the HRE recognizes that the existing house at 178 Sea Cliff Avenue “dates to the earliest phase of the subdivision’s development” (page 34). Both documents recognize that the boundaries of the overall district have never been confirmed. But there is little additional discussion of the phases of development or the boundaries; without this information or a historic context statement, there is no evidence to support a Categorical Exemption here because there was no analysis to justify a conclusion that demolishing a contributing building and replacing it with one that is not compatible with the district could not cause a significant impact. In fact, the information we submitted in our prior memorandum and the identification of instances of incompatibility between the new proposed modern design and the existing Sea Cliff residences indicate that the project may materially impair the significance of the district.

The HRE excerpts historic aerial photos and Sanborn maps, but the cropping omits an important development visible on them. A 1938 aerial photo shows that the south side of the 200 block of Sea Cliff Avenue was not developed at all during the period of significance, and only seven of the 20 lots of Assessor’s Block 1308 was developed. This raises the question of whether that block would be included in the district; if it were not, replacing 178 Sea Cliff with a building that is not compatible might affect the boundaries. Equally importantly, 178 Sea Cliff is not only one of the earliest buildings in the district, it is also the next-to-last one at the west end



San Francisco Property Information Map showing Sea Cliff historic district (medium green area at center). Boundary differences in HRER and original subdivision map from HRE are marked in red and green.

of the first phase oceanfront lots. This is apparent today to anyone who looks at the site, with much newer buildings to the west and more architecturally cohesive, older ones to the east. The HRE and HRER do not discuss this; this should be addressed before issuing a categorical

exemption. This is not the only boundary question the documents raise. The HRER Part 2 identifies the “likely” boundaries of the district differently from those shown on the San Francisco Property Information Map. Both boundaries exclude the stone gateposts on California Street; Richard Brandi and Denise Bradley listed two of these as landscape features for Sea Cliff in their historic context statement for residence parks.<sup>1</sup> The HRE and HRER do not discuss why the presumed boundaries of the district do not extend south to California Street to encompass the full area shown on the subdivision map for Sea Cliff on page 18 of the HRE. The HRE and HRER also never discuss the California Coastal Monument, which is shown on the Property Information Map, nor do they discuss the Coastal Act. The drawings for the proposed house appear to show a swimming pool at the edge of the cliff or cantilevered slightly over the slope. Since the district, a cultural landscape, is named for this land form which would apparently be affected by the proposed project (especially the swimming pool), the Categorical Exemption should explain why there is no potential to cause a significant impact to it.

**The importance of associations with Bolles, Allen, Halsteds, and other residential parks are not evaluated**

The HRE, and to a lesser degree the HRER, do mention William B. Hoag, Howard Brickell, Harry B. Allen, Edward Bolles, and the Halsted brothers, but they do not include an evaluation of whether 178 Sea Cliff Avenue has importance to the significance of the district because of its association with them. These men were active in a number of residential park developments, as discussed by Brandi and Bradley in their context statement. In particular, the fact that 170 and 178 Sea Cliff shared these associations should be evaluated to discern whether demolition of 178 Sea Cliff Avenue would diminish the role of the district among residential parks in San Francisco and thus result in additional historic resources impacts that trigger the exception to the Categorical Exemption.

For all of the reasons indicated above, the Planning Commission in upholding staff’s recommendation to rely on a categorical exemption for the 178 Sea Cliff Project has failed to establish that the eligible Sea Cliff Historic District would not be materially impaired by the demolition of the existing contributor and replacement with a new, incompatible building. At a minimum, the district boundaries, the importance of the existing building to the Sea Cliff District, and the ways the proposed design could be modified to incorporate the Secretary of Interior’s Standards for the Treatment of Historic Properties should be evaluated to avoid a significant impact to the potential Sea Cliff Historic District.

Sincerely,



Frederic Knapp

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<sup>1</sup> [https://www.sfog.us/homes/San\\_Francisco\\_Residence\\_Parks.pdf](https://www.sfog.us/homes/San_Francisco_Residence_Parks.pdf). Page 116.