File No. 110759

Committee Item No. _____
Board Item No. 35

COMMITTEE/BOARD OF SUPERVISORS

AGENDA PACKET CONTENTS LIST

Committee _____ Date _____

Board of Supervisors Meeting Date August 2, 2011

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OTHER (Use back side if additional space is needed)

☐ ☐ Appeal of Determination of Exemption from Environmental Review 1945 Hyde Street

☐ ☐ _____

☐ ☐ _____

Completed by: Joy Lamug Date July 28, 2011

Completed by: _____ Date _____

An asterisked item represents the cover sheet to a document that exceeds 20 pages. The complete document is in the file.

Russian Hill Community Association

1134 Green St. San Francisco, CA 94109 415-776-2014 www.rhcasf.com

Angela Calvillo
Clerk of the Ward
Board of Supervisors
City Hall, Room 244
San Francisco, CA 94102

July 13, 2011

Subject: CEQA Appeal - Certificate of Determination Exemption from Environmental Review
1945 Hyde Street - Case No: 2010.0162E

Dear Ms. Calvillo:

The Russian Hill Community Association (RHCA) is appealing the issuance of a Categorical Exemption, for the proposed 1945 Hyde St. Project, Case No: 2010.01623, on the basis that the proposed project would have a range of significant adverse environmental effects that are not identified or adequately assessed in the rationale supporting the Categorical Exemption determination (attached).

The RHCA has participated extensively in a neighborhood review of the proposed project and its potential impacts. The RHCA has delivered these comments, concerns, and detailed assessments to the Planning Department, beginning with the RHCA "Response to Notice of Project Receiving Environmental Review," a 70 page document submitted 7/8/10, a "Summary of Potential Environmental Impacts of Project Requiring an EIR," a 4 page document submitted 8/9/10, and an 8 page addendum to the "Response to Notice of Project Receiving Environmental Review," submitted 1/26/11, (all available in the case file at the Planning Department.) The Categorical Exemption does not acknowledge many of these issues, nor the extensive neighborhood interest and involvement that this controversial project has generated over the past 13 months, and in fact, down plays them (see section on Neighborhood Concerns, page 15 of the determination.)

Compounding matters, the Categorical Exemption only partially represents—and in some cases misrepresents—the proposed action. These omissions are the source of a range of insufficiently evaluated impacts. Along the same lines, the Categorical Exemption fails to address several **unusual circumstances** that lead to significant environmental impacts. These **unusual contextual circumstances** are both local and citywide.

As such, the proposed project would not meet all the conditions that CEQA requires as the basis for exemptions generally, and for Class 32 exemptions (CEQA Guidelines Section 15032, in-fill projects) in particular. Either a Mitigated Negative Declaration or an Environmental Impact Report would appear to be the appropriate vehicles for the 1945 Hyde Street project's compliance with CEQA environmental review requirements.

Please find attached the following:

- a copy of the minutes of the action taken by the Planning Commission at the 6/16/11 DR hearing
- a copy of the CatEx determination, (signed on 1/27/10, electronically sent to the RHCA on 2/4/11, and received by the RHCA via USPS on 2/12/11)
- the Neighborhood Organization Fee waiver request form
- a check for $500 made out to SF Planning Department

We appreciate your attention to this matter and please let us know if you have any questions.

Sincerely,

Jamie Cherry

Jamie Cherry
Co-Chair, RHCA 1945 Hyde Street Project Team, jcherry@rhcasf.com

SAN FRANCISCO
PLANNING DEPARTMENT

NEIGHBORHOOD ORGANIZATION FEE WAIVER REQUEST FORM

Appeals to the Board of Supervisors and Planning Commission

1650 Mission St
Suite 400
San Francisco,
CA 94103-2479

Reception
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

This form is to be used by neighborhood organizations to request a fee waiver for CEQA and conditional use appeals to the Board of Supervisors and DR and CEQA appeals to the Planning Commission.

Should a fee waiver be sought, an appellant must present this form to the Planning Information Counter (PIC) at the ground level of 1660 Mission Street along with relevant supporting materials identified below. Planning staff will review the form and may sign it 'over-the-counter' or may accept the form for further review.

Should a fee waiver be granted, the Planning Department would not deposit the check, which was required to file the appeal with the Planning Department. The Planning Department will return the check to the appellant.

TYPE OF APPEAL FOR WHICH FEE WAIVER IS SOUGHT

[Check only one and attach decision document to this form]

- ☐ Conditional Use Authorization Appeals to the Board of Supervisors
- ☒ CEQA Appeals to the Board of Supervisors (including EIR's, NegDec's, CatEx's, and GRE's.)
- ☐ Discretionary Review Request (to the Planning Commission)
- ☐ CEQA Appeals to the Planning Commission (Negative Declaration)

REQUIRED CRITERIA FOR GRANTING OF WAIVER

[All criteria must be satisfied. Please check all that apply and attach supporting materials to this form]

- ☐ The appellant is a member of the stated neighborhood organization and is authorized to file the appeal on behalf of that organization. Authorization may take the form of a letter signed by the president or other officer of an organization.
- ☒ The appellant is appealing on behalf of a neighborhood organization which is registered with the Planning Department and which appears on the Department's current list of neighborhood organizations.
- ☐ The appellant is appealing on behalf of a neighborhood organization, which was in existence at least 24 months prior to the submittal of the fee waiver request. Existence may be established by evidence including that relating to the organization's activities at that time such as meeting minutes, resolutions, publications, and rosters.
- ☐ The appellant is appealing on behalf of a neighborhood organization, which is affected by the project, which is the subject of the appeal.

APPELLANT & PROJECT INFORMATION [to be completed by applicant]	
Name of Applicant: Jamie Cherry for	Address of Project: 1945 HYDE St 94109
Neighborhood Organization: Russian Hill Comm. Assn	Planning Case No: 2010.0162 E
Applicant's Address: 1134 Green St 94109	Building Permit No:
Applicant's Daytime Phone No: 415-346-5524	Date of Decision: 6/16/11 -
Applicant's Email Address: jcherry@rhcasf.com	

DCP STAFF USE ONLY

- ☐ Appellant authorization
- ☐ Current organization registration
- ☐ Minimum organization age
- ☐ Project impact on organization

Planner's Name: _____

Date: _____

Planner's Signature: _____

■ **WAIVER APPROVED** ■ **WAIVER DENIED**

SAN FRANCISCO

PLANNING COMMISSION

Meeting Minutes

Commission Chambers - Room 400

City Hall, 1 Dr. Carlton B. Goodlett Place

Thursday, June 16, 2011

12:00 PM

Regular Meeting

COMMISSIONERS PRESENT: Olague, Antonini, Fong, Moore, Sugaya

COMMISSONERS ABSENT: Miguel and Borden

THE MEETING WAS CALLED TO ORDER BY PRESIDENT OLAGUE AT: 12:15 PM

STAFF IN ATTENDANCE: John Rahaim – Director of Planning, Scott Sanchez – Zoning Administrator, Corey Teague, Chelsea Fordham, Rich Sucre, Rick Crawford, Glen Cabreros, Michael E. Smith, Kirsten Dischinger, Linda D. Avery – Commission Secretary

A. CONSIDERATION OF ITEMS PROPOSED FOR CONTINUANCE

The Commission will consider a request for continuance to a later date. The Commission may choose to continue the item to the date proposed below, to continue the item to another date, or to hear the item on this calendar.

1. 2009.0651C (B. FU: (415) 558-6613)

2045-2121 EVANS STREET - west side between Cesar Chavez and Napoleon Streets, Lots 001B & 002 in Assessor's Block 4343 - **Request for Conditional Use Authorization** under Planning Code Sections 157 and 303 to allow parking in excess of accessory amounts for the proposed Restaurant Depot building expansion, within the PDR-2 (Core Production, Distribution, and Repair) Zoning District

10a. 2010.0162DDV (R. CRAWFORD: (415) 558-6358)
1945 HYDE STREET - west side at Russell Street; Lot 002 in Assessor's Block 0123 - **Requests for Discretionary Review** of Building Permit Application No. 2010 0517 2557 proposing to convert a 58 stall parking garage to a mixed use building with 7 dwelling units, 14 parking spaces and a commercial unit. The project will add a one-story vertical addition to the top of the building that will be setback 12 feet from the front wall and 10 feet from the rear property line within the NC-1 (Neighborhood Commercial Cluster) Zoning District and 40-X Height and Bulk District.
Staff Analysis: Full Discretionary Review
Preliminary Recommendation: Do not take Discretionary Review and approve
(Continued from Regular Meeting of May 19, 2011)

SPEAKERS: Tim Colen, David Meckel, Michelle Sudduth, Kathleen Courtney, Scott Edmondson, Sarah Taber, Ben DeVeres, Joe Harney, Harvey Hacker, Joanne Allen, Richard Lerner, John Willis, Zoe Brillinger, Kevin Webb, Amy Boon, Steve Vettel, Jamie Cherry

ACTION: The Commission took DR and approved as amended: to unbundle parking; eliminate the awning; add setback footage

AYES: Olague, Antonini, Fong, Moore, Sugaya
ABSENT: Miguel and Borden
DRA: 0216

10b. 2010.0162DDV (R. CRAWFORD: (415) 558-6358)
1945 HYDE STREET - west side at Russell Street; Lot 002 in Assessor's Block 0123 - **Request for Variance**, pursuant to Planning Code Section 134 to modify the rear yard requirement in the NC-1 District. The project proposes to convert a 58 stall parking garage to a mixed

use building with 7 dwelling units, 14 parking spaces and a commercial unit. The project will add a one-story vertical addition to the top of the building that will be setback 10 feet from the rear property line where a setback of 25 feet is required within the NC-1 (Neighborhood Commercial Cluster) Zoning District and 40-X Height and Bulk District.
(Continued from Regular Meeting of May 19, 2011)

SPEAKERS: Same as those listed for item 10a
ACTION: The Zoning Administrator closed the public hearing and granted the variance subject to the standard conditions of approval

SAN FRANCISCO
PLANNING DEPARTMENT

Certificate of Determination
Exemption from Environmental Review

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
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Planning
Information:
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Case No.:	**2010.0162E**
Project Title:	**1945 Hyde Street**
Zoning:	NC-1 (Neighborhood Commercial Cluster District) 40-X Height and Bulk District
Block/Lot:	0123/002
Lot Size:	6,686 square feet
Project Sponsor	Steven Vettel, Authorized Agent for Owner John Willis, (415) 954-4902
Staff Contact:	Chelsea Fordham – (415) 575-9071 Chelsea.Fordham@sfgov.org

PROJECT DESCRIPTION:

The 6,686 square-foot project site is located on the west side of Hyde Street on the corner of Hyde and Russell Streets, with Union Street to the north and Green Street to the south, in the Russian Hill neighborhood of San Francisco. The project site currently contains a 19,739-square-foot, two-story over basement, parking garage constructed in 1920, containing 58 off-street parking spaces providing both long-term and short term parking.

EXEMPT STATUS:

Categorical Exemption, Class 32 [State CEQA Guidelines Section 15332]

REMARKS:

Please see the next page.

DETERMINATION:

I do hereby certify that the above determination has been made pursuant to State and Local requirements.

BILL WYCKO
Environmental Review Officer

January 27, 2011
Date

cc: Steve Vettel, Project Sponsor
Rick Crawford, Neighborhood Planning, Northeast Team
Moses Corrette, Preservation Planner
Supervisor David Chiu, District 3
VirnaLiza Byrd, M.D.F
Historic Preservation Distribution List

PROJECT DESCRIPTION (CONTINUED):

The proposed project would convert the building into a three-story over basement, seven- unit residential building, with 14 parking spaces provided by stackers, and one approximately 860 square-foot commercial space along Hyde Street. The existing height of the building is 32 feet and the proposed third floor addition would increase the height to 40 feet. Modification to the building would include enclosure of the front arches for vehicular access into retail entrances and conversion of an arch on Russell Street into the proposed off-street parking garage entrance. Additionally, the proposed project would increase the gross-square-footage of the building from 19,739 to 25,187 square feet. The project site is located in the NC-1 (Neighborhood Commercial Cluster District) zoning district and a 40-X height and bulk district.

California Environmental Quality Act (CEQA) State Guidelines Section 15332, or Class 32, provides an exemption from environmental review for in-fill development projects that meet the following conditions:

a) *The project is consistent with applicable general plan designations and policies as well as with applicable zoning designations.*

Zoning: The project site is located within the Neighborhood Commercial Cluster District (NC-1) zoning district. The proposed residential and retail uses are principally permitted within the NC-1 zoning district. The proposed third story addition would be 40 feet tall, which is the permitted height for the project site.

Parking: Per section 151 of the Planning Code, the proposed project would be required to provide one off-street parking space for each dwelling unit and no off-street parking spaces for the commercial space because the commercial space will not exceed an occupied floor area of 5,000 square feet. The proposed project includes a total of 14 off-street parking spaces for the residential units.

Open Space: The open space requirement defined in *Planning Code* Section 135 requires 100 square feet of private open space or 133 square feet of common usable open space for each dwelling unit. The proposed project would satisfy this requirement with 671 square feet of common open space in the form of a roof deck for five of the dwelling units, and 1,356 square feet of private open space in the form of terraces for two of the dwelling units.

b) *The development occurs within city limits on a site of less than five acres surrounded by urban uses.*

The 6,686-square-foot (approximately 0.15 acre) project site is located within a fully developed area of San Francisco. The surrounding area is densely developed with residential, commercial, and retail uses. The proposed project would involve reuse of an existing building from a parking garage to a mixed-use building with residential and commercial uses; therefore, the proposed project would be properly characterized as in-fill development completely surrounded by urban uses.

c) The project site has no habitat for endangered, rare or threatened species.

The subject property is a garage building located within a densely developed urban area. The project site does not currently support any vegetation or habitat for endangered, rare, or threatened species.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic: The project site is located on the west side of Hyde Street, on the block bounded by Russell and Union Streets to the north, Green Street to the south, Larkin Street to the west, and Leavenworth Street to the east. Street parking is available on all adjacent streets, including two-hour, and residential permit parking with weekly parking restrictions for street cleaning.

Using the Planning Department's *2002 Transportation Impact Analysis Guidelines for Environmental Review* (October 2002), the proposed project is estimated to generate approximately 199 daily person-trips for the proposed residential and commercial uses.[1] Of these, about 24 daily person-trips would be during the p.m. peak-hour. These trips would be distributed among various modes of transportation, including single occupancy vehicles, carpools, public transit, walking, and bicycling. Of the 24 p.m. peak-hour person-trips for the proposed uses, nine would be vehicle trips, seven would be transit trips, six would be walking, and two trips would be through some other mode of transportation such as bicycle. Mode split and vehicle occupancy data for both retail and residential uses were obtained from the 2000 Census "Journey to Work" and Citywide Travel Behavior Survey figures. The incremental increase in traffic would not be considered a substantial increase relative to the existing capacity of the local street system. The change in traffic in the project area as a result of the proposed project would be indiscernible to most drivers. The proposed project would add a negligible increment to the cumulative long-term traffic increase on the neighborhood's roadway network. Thus, the project would not substantially affect the neighborhood's existing traffic conditions.

The project would also include closing two existing curb cuts along Hyde Street, which is used to access the parking garage, and create a new curb cut along Russell Street to access the residential off-street parking garage. Russell Street is a one-way street that extends from Hyde Street west to a mid-block alley that is accessed from Union and Green Streets. The enclosure of the curb cuts along Hyde Street and creation of a new curb cut could result in the redistribution of vehicle trips from Hyde Street to Russell Street, but not in the larger vicinity, and the relatively low volume along Russell Street would mean that the change in traffic circulation at the site would not be expected to result in any significant conflicts with other vehicles or pedestrians or bicycles, and no significant effects would ensue. Removal of the Hyde Street curb cuts would reduce the potential for vehicle conflicts on Hyde Street, which has constraints resulting from the cable car tracks running along this corridor. Therefore, effect on traffic flow would be considered less-than-significant.

[1] *Transportation Impact Analysis Guidelines, Transportation Calculations.* This document is available for public review as part of Case No. 2010.0162E at 1650 Mission Street, Suite 400, San Francisco, CA, 94103.

Transit, Bicycle and Pedestrian Circulation. The project is expected to generate 51 daily transit person-trips, seven of which would occur in the p.m. peak hour. The project site is well served by Muni, and is within one block of the 41-Union and 45-Union/Stockton lines, two blocks of the 19-Polk line, and directly in front of the Powell-Hyde cable car route. The project site is within two blocks of Bicycle Route #25-Polk. Additionally, sidewalks are wide enough to support the anticipated increase in pedestrian use. The proposed project would not result in impacts to the Powell-Hyde cable car route because the project would remove the vehicular entrances along Hyde Street, and place commercial uses along Hyde Street, which would not result in transit or pedestrian conflicts with the cable car. Thus, the project would not substantially affect the neighborhood's existing conditions for transit, bicycle, and pedestrian circulation.

Emergency Access. Existing emergency access to the project site would be provided from both Hyde and Russell Streets. The proposed project would not interfere with existing traffic circulation or cause major traffic hazards, nor have a significant effect on traffic-related hazards or emergency access provisions. The proposed project would be required to meet the standards contained in the Building and Fire Codes, and the San Francisco Building and Fire Departments would review the final building plans to ensure sufficient access and safety. Therefore, the project would not result in impact on emergency access conditions.

Increased Traffic Hazards. The proposed project does not include any design features that would substantially increase traffic hazards (e.g., creating a new sharp curve or dangerous intersections), and would not include any incompatible uses; therefore, there would no impacts associated with traffic hazards for the proposed project. The proposed project would include closing two existing approximately 20-foot curb cuts along Hyde Street to convert the front exterior of the project site to create a commercial space along Hyde Street. Additionally, the proposed project would then create a new approximately 10-foot wide curb cut on an existing enclosed arch along Russell Street. This curb cut would be utilized to access the off-street residential parking for the project. The proposed curb cut and garage entrance along Russell Street could require cars entering the garage to complete a three point turn to enter the residential parking garage; however, due to the low volume of trips on Russell Street associated with the proposed project, this would not be considered a substantial increased hazard. A new curb cut accessing the project's proposed garage would be the project's only transportation-related design feature, and would not be out of character or present a substantial increased hazard.

Parking. The proposed project would change the use of the project site from a parking garage building with a 58 off-street parking spaces for both long-term and short-term to a mixed-use building with 14 off-street parking spaces for the residential use. Therefore, the proposed project would result in the loss of 58 off-street parking spaces for long term and short term parking for retail and residential uses within the vicinity of the project site. The proposed project would generate the demand for 13 parking spaces, and would provide 14 spaces for a surplus of one parking space.

San Francisco does not consider parking supply as part of the permanent physical environment and therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Parking conditions are not static, as parking supply and demand varies from day to day, from

day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact. (CEQA Guidelines § 15131(a).) The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City's "Transit First" policy. The City's Transit First Policy, established in the City's Charter Section 16.102 provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably addresses potential secondary effects.

Construction Impacts. The proposed project would be constructed over a period anticipated to last approximately 10-14 months. Construction activities would include daily vehicle trips generated by the arrival and departure of construction workers. Approximately 20 workers would commute to the construction site each day for approximately 10-14 months for renovation and construction of the proposed project. Trucks would haul excavated materials away from the site and haul assembly materials to the site. Hyde, Union, and Green Streets would be used to access the site to haul building materials. Construction of the proposed project would not require any lane closures.

Throughout the construction period, there would be a flow of construction-related trucks into and out of the site. The project sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic (DPT), the Fire Department, Muni's Street Operations and Special Events Office, and other City agencies to determine feasible traffic modifications to reduce traffic congestion and other potential traffic disruption and pedestrian circulation effects during construction of the project. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect

both traffic and transit operations. Construction workers who drive to the site could cause a temporary parking demand, and the project applicant would make accommodations for construction worker parking. Therefore, it is anticipated that construction workers would be accommodated without substantially affecting area wide parking conditions. The impacts of construction on parking and traffic would be limited in scope and temporary in duration, and would not be significant.

Noise: The *San Francisco General Plan* noise guidelines indicate that any new residential development in areas with noise levels above 60 dBA[2] should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features are included in the design. In areas where noise levels exceed 65 dBA, a detailed analysis of noise reduction requirements must be done and needed noise insulation features included in the design.

Title 24 of the California Code of Regulations establishes uniform noise insulation standards for multi-unit residential projects. This state regulation requires meeting an interior standard of 45 dBA in any habitable room. DBI would review the final building plans to ensure that the building wall and floor/ceiling assemblies for the residential development meet State standards regarding sound transmission for residents.

An environmental noise study was prepared for the proposed project to determine whether the project can meet the applicable standards of Title 24 and the *San Francisco General Plan.* [3] Additionally, the noise study provides a quantification of the noise environment within the vicinity of the project site. The noise study reported that the dominant noise sources within the vicinity of the project site are vehicular traffic along Hyde Street, noise from the cable car system (i.e. cable whine), and cable car passbys. Three 48-hour noise measurements recorded a day-night noise average of between 65 – 75 dBA (Ldn). This is within the range forecast by noise modeling undertaken by the Department of Public Health, which predicts a traffic noise level above 70 dBA (Ldn).

Given the noise environment at the project site, the noise study concluded that it would appear that conventional residential construction, which would include sound-rated windows (which typically offer 25 to 30 dBA noise reduction), and a ventilation system would be necessary to ensure an interior noise environment in habitable rooms of 45 dBA (Ldn) as required by the San Francisco Building Code.[4] Therefore, the noise study demonstrates that acceptable interior noise levels consistent with those in the Title 24 standards can be attained by the proposed project and no further acoustical analysis or engineering is required to comply with this requirement.

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[2] The dBA, or A weighted decibel, refers to a scale of noise measurement that approximates the range of sensitivity of the human ear to sounds of different frequencies. On this scale, the normal range of human hearing extends from about 0 dBA to about 140 dBA. A 10-dBA increase in the level of a continuous noise represents a perceived doubling of loudness.

3 Charles M. Salter Associates Inc., March 30, 2010. Environmental Noise Study – 1945 Hyde Street, prepared for Luke Ogrydziak, Ogrydziak/Prillinger Architects. This document is on file and is available for review as part of Case File No. 2010.0162E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA.

4 Charles M. Salter Associates Inc., March 30, 2010. Ibid

Noises generated by residential and commercial uses are common and generally accepted in urban areas. An approximate doubling of traffic volumes in the area would be necessary to produce an increase in ambient noise levels noticeable to most people. The proposed project would not cause a doubling in traffic volumes and therefore would not cause a noticeable increase in the ambient noise level in the project vicinity.

Project construction would temporarily and intermittently increase noise and possibly vibration levels around the project site and may be considered an annoyance by occupants of nearby properties. Noise and vibration levels over the estimated 10-14 month construction period would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Construction noises associated with the proposed project would include excavation, truck traffic, and finishing. Of these, excavation, and site work would likely generate the most construction-related noise.

Throughout the construction period there would be truck traffic to and from the site, hauling away excavated materials and debris, or delivering building materials. It is anticipated that the construction hours would be working hours from 7AM to 5PM during the week, with possible limited work during weekends.

The San Francisco Noise Ordinance (Article 29 of the Police Code) regulates construction-related noise. Although not listed as a mitigation measure, it is required by law and would serve to mitigate significant negative impacts of the proposed project on sensitive receptors. The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA5 at a distance of 100 feet from the source. Impact tools, such as jackhammers, must have both the intake and exhaust muffled to the satisfaction of the Director of the Department of Public Works or the Director of Building Inspection. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection. The project must comply with regulations set forth in the Noise Ordinance.

Sensitive receptors are people requiring quiet, for sleep or concentration, such as residences, schools, or hospitals, and people themselves who may be relatively more susceptible to adverse health impacts from their environment, such as immune-compromised individuals, populations with elevated levels of chronic illness, children, and the aged. The nearest sensitive receptors to the project site would be nearby residents, including residents of the buildings immediately west of the project site along Russell Street, and north and south along Hyde Street. Construction activities other than pile driving typically generate noise levels no greater than 90 dBA (for instance, for excavation) at 50 feet from the activity, while other activities, such as concrete work, are much less noisy. Closed windows typically can reduce daytime interior noise levels to an acceptable level. Therefore, for nearby sensitive receptors, although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly

5 dBA is the symbol for decibels using the A-weighted scale. A decibel is a unit of measurement for sound loudness (amplitude). The A- weighted scale is a logarithmic scale that approximates the sensitivity of the human ear.

experienced in an urban environment, and would not be considered significant. The proposed building would not use pile driving. The proposed project would not create unusual levels of ground borne vibration that would disturb nearby residents or businesses, and vibration impacts would be less than significant. Given the above-mentioned City noise regulations and the temporary nature of construction work, construction noise would have a less-than-significant effect on the environment.

Air Quality: The California Air Resources Board (ARB) established its statewide comprehensive air toxics program in the early 1980s. The ARB created California's program in response to the Toxic Air Contaminant Identification and Control Act (AB 1807, Tanner 1983) to reduce exposure to air toxics. The ARB identifies 244 substances as toxic air contaminants (TACs) that are known or suspected to be emitted in California and have potential adverse health effects. Public health research consistently demonstrates that pollutant levels are significantly higher near freeways and busy roadways. Human health studies demonstrate that children living within 100 to 200 meters of freeways or busy roadways have poor lung function and more respiratory disease; both chronic and acute health effects may result from exposure to TACs. In 2005, The ARB issued guidance on preventing roadway related air quality conflicts, suggesting localities "avoid siting new sensitive land uses within 500 feet of a freeway [or other] urban roads with volumes of more than 100,000 vehicles/day."[6] However, there are no existing federal or state regulations to protect sensitive land uses from roadway air pollutants.

The San Francisco Department of Public Health (DPH) has issued guidance for the identification and assessment of potential air quality hazards and methods for assessing the associated health risks.[7] Consistent with ARB guidance, DPH has identified that a potential public health hazard for sensitive land uses exists when such uses are located within a 150-meter (approximately 500-foot) radius of any boundary of a project site that experiences 100,000 vehicles per day. To this end, San Francisco added Article 38 of the San Francisco Health Code, approved November 25, 2008, which requires that, for new residential projects of 10 or more units located in proximity to high-traffic roadways, as mapped by DPH, an Air Quality Assessment be prepared to determine whether residents would be exposed to potentially unhealthful levels of $PM_{2.5}$. Through air quality modeling, an assessment is conducted to determine if the annual average concentration of $PM_{2.5}$ from the roadway sources would exceed a concentration of 0.2 micrograms per cubic meter (annual average).[8] If this standard is exceeded, the project sponsor must

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6 California Air Resources Board, *2005 Air Quality and Land Use Handbook: A Community Health Perspective*, http://www.arb.ca.gov/ch/landuse.htm, accessed September 8, 2008.

7 San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 6, 2008, http://dphwww.sfdph.org/phes/publications/Mitigating_Roadway_AQLU_Conflicts.pdf, accessed September 8, 2009.

8 According to DPH, this threshold, or action level, of 0.2 micrograms per cubic meter represents about 8 – 10 percent of the range of ambient PM2.5 concentrations in San Francisco based on monitoring data, and is based on epidemiological research that indicates that such a concentration can result in an approximately 0.28 percent increase in non-injury mortality, or an increased mortality at a rate of approximately 20 "excess deaths" per year per one million population in San Francisco. "Excess deaths" (also referred to as premature mortality) refer to deaths that occur sooner than otherwise expected, absent the specific condition under evaluation; in this case, exposure to PM2.5. (San Francisco Department of Public Health, Occupational and Environmental Health Section, Program on Health, Equity, and Sustainability, "Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review, May 6, 2008. Twenty excess deaths per million based

install a filtered air supply system, with high-efficiency filters, designed to remove at least 80 percent of ambient $PM_{2.5}$ from habitable areas of residential units.

The project site, at 1945 Hyde Street is not located within the Potential Roadway Exposure Zone, as mapped by DPH. Thus, the proposed project is not expected to result in a significant impact from exposure of sensitive receptors to high concentrations of roadway-related pollutants.

Air Quality Impacts Related to Construction Dust. The San Francisco Building and Health Codes contain measures that reduce the quantity of dust generated during site preparation, demolition, and construction work to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI). These measures, generally referred as the Construction Dust Control Ordinance, require that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The proposed project would primarily occur on top of the existing pavement, except for the proposed car-stackers which would require limited excavation, and thus would be unlikely to result in dust-related air quality impacts.

Water Quality: The proposed project would not generate wastewater or result in discharges that would have the potential to degrade water quality or contaminate a public water supply. Project-related wastewater and storm water would flow to the City's combined sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge. Therefore, the proposed project would not result in significant water quality impacts.

e) The site can be adequately served by all required utilities and public services.

The project site is located in a dense urban area where all public services and facilities are available; no expansion of public services or utilities would be required.

Historic Architectural Resources

In evaluating whether the proposed project would be exempt from environmental review under the California Environmental Quality Act (CEQA), the Planning Department must first determine whether the building located at 1945 Hyde Street is a historical resource as defined by CEQA. As described in the Historic Resource Evaluation Response (HRER) memorandum dated July 8, 2010, 1945 Hyde Street appears to be eligible for listing in the California Register of Historical Resources as an individual resource under Criteria 3 (Architecture) and as a contributor to potential historic district.[9]

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on San Francisco's non-injury, non-homicide, non-suicide mortality rate of approximately 714 per 100,000. Although San Francisco's population is less than one million, the presentation of excess deaths is commonly given as a rate per million population.)

[9] Memorandum from Moses Corrette, Preservation Technical Specialist, to Chelsea Fordham, Environmental Planner, Major Environmental Analysis, July 8, 2010. This document is on file and is available for review as part of Case File No. 2010.0162E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA.

The building at 1945 Hyde Street is a 19,739 square-foot, two-story over basement parking garage containing 58 off-street parking spaces, which was constructed in 1920. The primary character defining features of the building at 1945 Hyde Street include its visible massing from Hyde Street, parapets, decorative brick detailing, and arched openings, large industrial sash windows, and overall spatial relationship to adjacent buildings and the surrounding neighborhood.

The building at 1945 Hyde Street embodies the distinctive characteristics of a type, a 1920 ramped parking garage with an architecturally embellished exterior. It was designed in the Mission Revival and Secessionist styles. Although not a classical design like the surrounding Classical Revival apartment buildings, the building still exhibits an order and symmetry intended to blend well with the existing buildings. After the 1920s, parking garage design moved away from the visually contextual design influence to a more functional and practical design that did not necessarily blend with its surroundings. Because it embodies the distinctive characteristics of its type, the building is eligible for listing in the California Register under Criterion 3 (Architecture). Additionally, the subject building retains a high degree of integrity with respect to location, association, design, workmanship, setting, materials, and feeling.[10] Therefore, the subject property is considered a historic resource under CEQA. Additionally, the building at 1945 Hyde Street may also contribute to a potential historic district of neighborhood-serving automobile parking garages built from the first half of the 20th century, if such a district was proposed. The garages would store private automobiles, and provide basic maintenance services. In the case of 1945 Hyde Street, the surrounding blocks of Russian Hill were served.

The building at 1945 Hyde Street also has an indirect association with Carolyn and Neal Cassady, their home across Russell Street, at number 29 is also associated with the Beat poet Jack Kerouac who lived with the couple in 1952. The project site at 1945 Hyde Street provided the backdrop of a well known photograph of the two men c. 1952 depicting the pair against the concrete wall, with the steel window in the basement as the sole identifying element of the building in the photo, which was later used as the cover photo for the book *On the Road* by Jack Kerouac. However, this indirect association does not qualify 1945 Hyde Street for listing on the California Register per Criterion 2 (Persons).

The Planning Department preservation staff assessed whether the proposed project, which would include conversion of the property from a parking garage to a mixed-use residential and commercial building with a third story addition, would result in a substantial adverse change to the historical resource. The proposed project at 1945 was assessed for its consistency with the Secretary of the Interior Standards for Rehabilitation (Standards) analysis.[11] Based upon this analysis, Planning Department staff finds that the project would not cause a substantial adverse change in the resource such that the significance of the building would be materially impaired for the following reasons.

- The proposed project would retain the physical structure, but not use, of the historic automobile garage at the site *(Secretary Standards 2, 5)*.

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[10] Memorandum from Moses Corrette, July 8, 2010, Ibid.

[11] Kelley & VerPlanck Historic Resources Consulting, Historical Resource Evaluation 1945 Hyde Street San Francisco California, February 2010, p18

- The new use will require minimal changes to the building's distinctive materials, features, spaces, and spatial relationships. *(Secretary Standard 1).*
- The proposed new penthouse would be designed in a contemporary style that uses a simple vocabulary in order to create compatible design that is distinguishable as a new feature within the site. The penthouse would rise approximately seven feet above the parapet height on the Russell Street elevation; a roof terrace with 42" clear glass railing would be set back approximately 15 feet from the building wall, which would not be visible from Russell Street. *(Secretary Standards 3, 9)*
- The new floor could be removed entirely in the future without harming the historic integrity of the building. *(Secretary Standard 10).*
- The steel window at the basement level of the Russell Street elevation which can be seen in the c. 1952 photograph of Jack Kerouac and Neal Cassady will be retained and rehabilitated. *(Standards 4, 5, 6)*
- The remaining existing steel sash industrial windows will be replaced due to extensive deterioration and distortion of the steel sash. A condition survey of all existing windows has been conducted. It reveals overall heavy corrosion, deterioration, and distortion, as well as separation of the frames from the concrete openings. The project proposes to replace them with new windows that replicate the existing sash profile and glazing pattern. *(Secretary Standard 6).*

Therefore, based upon the project's consistency with the Secretary of the Interior Standards, and the fact that the project would not would result in a substantial adverse change to the historical resource, the impact was determined to be less-than-significant.

The proposed project would also not result in an impact to off-site historic resources. Russell Street to the south and west of the subject property is a potential historic district of small scale residential buildings built between 1906 and 1908, with two buildings from the 1910s that together could be eligible for listing on the California Register. Several buildings are listed on the 1976 Architectural Survey, and the Here Today survey, and are presumed to be historic resources. The proposed project is adjacent to the potential district within a building that is of a vastly different type, period, and method of construction, and could not be part of that architectural context. The building is of a larger scale than the adjacent Russell Street buildings, however, 1945 Hyde has been part of the fabric of the neighborhood for 90 years, as it has served as a community parking garage for several decades. The proposed alterations to the building would be minimally visible and, while an incremental change to the setting of Russell Street, the conversion and addition would not have a significant adverse effect on the integrity of the adjacent resources.

Hazards and Hazardous Materials

The City has adopted an ordinance (Ordinance 253-86, signed by the Mayor on June 27, 1986), which requires analyzing soil for hazardous wastes within specified areas, known as the Maher area, when over 50 cubic yards of soil are to be disturbed and on sites specifically designated by the Director of Public

Works.[12] The project site falls outside the boundary of the Maher Ordinance and, therefore, would not be subject to this ordinance.

A Phase I Environmental Site Assessment (ESA) and soil sampling and analysis were prepared for the project site.[13; 14] The Phase I ESA reviews and summarizes previous environmental documents prepared for other sites in close proximity to the project site, lists current and past operations, reviews environmental agency databases and records, reports site reconnaissance observations, and discusses potential contamination issues. The Phase 1 identified one recognized environmental conditions associated with the project site. Review of fire department records indicate a permit was issued on May 7, 1941 for the installation of one 550-gallon underground storage tank (UST) which was reportedly installed to replace one of two 285 –gallon UST's. A Notice of Application for a permit dated November 11, 1963 indicated that two UST's were to be removed from the subject property and replaced with two, 2,000 gallon gasoline UST's. Review of permits from the Department of Public Health (DPH) indicates that the two, 2,000-gallon gasoline UST's were removed from the project site on January 26, 1996. These previously removed UST's represent a historical recognized environmental condition. Therefore, soil sampling and analysis was conducted to determine if the UST's resulted in contamination of the soils on the project site. Analytical results of the sampling and analysis program indicate the soil to be excavated did not contain any petroleum hydrocarbon constituents at or above the method reporting limits and the metal concentrations were within background levels. Based on the analytical results of the soil samples analyzed, the soil is an unrestrictive waste and no special soil handling will be needed.[15]

The results of the soil sampling and analysis determined that that no further action is required for the site and any potential impacts associated with hazardous materials from the previous UST's would be less-than-significant. [16]

Building Asbestos. Due to the age of the existing structures, asbestos-containing materials may be found within the existing on-site structure proposed to be altered. Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable Federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both

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[12] The Maher Ordinance applies to that portion of the City bayward of the original high tide line, where past industrial uses and fill associated with the 1906 earthquake and bay reclamation often left hazardous waste residue in soils and groundwater. The ordinance requires that soils must be analyzed for hazardous wastes if more than 50 cubic yards of soil are to be disturbed.

[13] Property Solutions Inc. Phase I Environmental Site Assessment for Parking Garage 1945 Hyde Street and 22 Russell Street, San Francisco, California, March 5, 2009.

[14] Treadwell & Rollo, Soil Sampling and Analysis, 1945 Hyde Street, San Francisco, California, November 4, 2010.

[15] Treadwell & Rollo, November 4, 2010, Ibid

[16] City and County of San Francisco Department of Public Health, Division of Occupational and Environmental Health, letter to John Parker Willis, Green Garage LLC, November 12, 2010. This document is on file and available for public review by appointment at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, as part of the project file 2010.0162E.

inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or abatement work.

Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/altered including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The District randomly inspects asbestos removal operations. In addition, the BAAQMD will inspect any removal operation concerning which a complaint has been received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material is required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Pursuant to California law, the Department of Building Inspection (DBI) would not issue the required permit until the applicant has complied with the notice requirements described above.

These regulations and procedures, already established as a part of the permit review process, would ensure that any potential impacts due to asbestos would be reduced to a less-than-significant level.

Lead-Based Paint. Because of the age of the existing building it may contain lead-based interior or exterior paint. Demolition or alterations must comply with Chapter 34, Section 3407 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on any building built on or before December 31, 1978, or any steel structures to which lead-based paint disturbance or removal would occur, and exterior work would disturb more than 100 square feet or 100 linear feet of lead-based paint, Chapter 34 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Chapter 34 contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the Department of Housing and Urban Development (HUD) Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall make all reasonable efforts to prevent migration of work debris beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The ordinance also includes notification requirements, contents of notice, and requirements for signs. Notification includes notifying bidders for the work of any paint inspection reports verifying the presence or absence of lead-based paint in the regulated area of the proposed project. Prior to commencement of work, the responsible party must provide written notice to the Director of the Department of Building Inspection of the location of the proposed project; the nature and approximate square footage of the painted surface being disturbed and/or removed; anticipated job start and completion dates for the work; whether the responsible party has reason to know or presume that lead-based paint is present; whether the building is residential or nonresidential, owner-occupied or rental property, approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. (Further notice requirements include Sign When Containment is Required, Notice by Landlord, Required Notice to Tenants, Availability of Pamphlet related to protection from lead in the home, Notice by Contractor, Early Commencement of Work [by Owner, Requested by Tenant], and Notice of Lead-Contaminated Dust or Soil, if applicable.) The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

These regulations and procedures established by the San Francisco Building Code would ensure that potential impacts associated with lead-based paint disturbance during construction activities would be reduced to a level of insignificance.

Aesthetics and Community Character

Design and aesthetics are by definition subjective, and open to interpretation by decision-makers and members of the public. Under CEQA, a proposed project would be considered to have a significant adverse effect on visual quality only if it would cause a substantial and demonstrable negative change. The proposed project's specific building design and aesthetic would be considered during the City's Planning approval and design review process.

The proposed project would convert an existing parking garage into a mixed-use building with seven residential units and a ground-floor commercial space. Additionally, the project would construct a third floor addition that would increase the height from 32 to 40 feet; however, this increase in height and change of use would not substantially alter the existing character of the surrounding neighborhood, which is primarily two-to three-story multi-family residential buildings and mixed-use buildings with small-scale ground-floor commercial uses and residential above. While intensifying the use on the project site, the proposed project would not add a new or visually inconsistent presence to the area. The proposed building envelope meets planning code requirements for NC-1 zoning and 40-X height-bulk district.

The proposed project would be visible from within the neighborhood of the project site vicinity, particularly from the adjoining properties to the project site. The change in views would not exceed that commonly expected in an urban setting and would not be considered an environmental impact of the proposed project.

Additionally, the project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass at the pedestrian level. Mirrored glass would not be used in the building. The project's lighting is consistent with exterior lighting typical of other buildings in the project vicinity. For these reasons, the proposed project would not generate obtrusive light or glare that would substantially impact other properties. Light and glare would not be considered a significant impact of the project. For these reasons, the project would not have a significant impact on visual quality under CEQA.

Neighborhood Concerns

A "Notification of Project Receiving Environmental Review" was mailed on June 14, 2010 to owners and occupants of properties within 300 feet of the project site. The Department received several phone calls, emails, and letters in response to this notice. Respondents requested to receive further environmental review documents and/or expressed concerns regarding the proposed project. Concerns regarding the proposed project included: (1) the loss of short-term and long-term parking for residents and businesses within the vicinity of the project site; (2) hazardous materials impacts; (3) impacts to historic resources, including the project site and adjacent historic districts; (4) noise and air quality impacts from the loss of parking and increased cars circling and looking for parking; (5) noise impacts from construction; (6) compatibility with applicable plans and zoning; (7) land use impact; (8) aesthetics impacts; and (9) pedestrian impacts. These issues were addressed in the discussion presented above.

There were numerous non-CEQA related comments, some of which are addressed in other stages of project review such as consideration of project approvals or building permit review. They include the following: economic issues, such as the loss of affordable housing from the loss of a neighborhood parking facility, impacts to the economy from the loss of parking for surrounding commercial uses, and community controversy and opposition.

Conclusion

CEQA State Guidelines Section 15332, or Class 32, allows for an exemption of an in-fill development meeting various conditions. As described above, the proposed project is an in-fill development that would have no significant adverse environmental effects and would meet all the various conditions prescribed by Class 32. Accordingly, the proposed project is appropriately exempt from CEQA under Section 15332.

CEQA State Guidelines Section 15300.2 states that a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. There are no unusual circumstances surrounding the current proposal that would suggest a reasonable possibility of a significant effect. The proposed project would have no significant environmental effects and therefore, is appropriately exempt under Class 32 of the *CEQA Guidelines*.

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APPEAL OF CATEGORICAL EXEMPTION
1945 Hyde Street

DATE: July 26, 2011

TO: Angela Calvillo, Clerk of the Board of Supervisors

FROM: Bill Wycko, Environmental Review Officer – (415) 575-9048
Chelsea Fordham, Case Planner – (415) 575-9071

RE: File No. 110759, Planning Case No. 2010.0162E
Appeal of Categorical Exemption for 1945 Hyde Street

HEARING DATE: August 2, 2011

ATTACHMENTS:

A – Letter of Appeal (July 13, 2011)
B – Certificate of Exemption from Environmental Review
C– Russian Hill Community Association (RCHA) Submittal to Planning Department "Response to Notice of Project Receiving Environmental Review," July 8, 2010
D – Russian Hill Community Association (RCHA) Submittal to Planning Department "Summary of Potential Environmental Impacts of Project Requiring an EIR," August 9, 2010
E– Russian Hill Community Association (RCHA) Submittal to Planning Department "Addendum to Response to Notice of Project Receiving Environmental Review," January 26, 2011

PROJECT SPONSOR: Steve Vettel, Farella Braun + Martel LLP, on behalf of project sponsor Green Garage LLC., John Parker Willis

APPELLANT: Jamie Cherry, on behalf of the Russian Hill Community Association

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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 Certificate under the California Environmental Quality Act. ("CEQA Determination") for a project at 1945 Hyde Street (the "Project").

The Department, pursuant to Title 14 of the CEQA Guidelines, issued a Categorical Exemption Certificate (exemption) for 1945 Hyde Street on January 27, 2011, and reissued the exemption May 16, 2011 to address project changes, finding that the proposed Project would not have a significant effect on the environment.[1]

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 the Department staff for additional environmental review.

SITE DESCRIPTION & PRESENT USE:

The 6,686 square foot (sf) project site (Assessor's Block 0123, Lot 002) is located on the west side of Hyde Street on the corner of Hyde and Russell Streets, with Union Street to the north and Green Street to the south, in the Russian Hill neighborhood of San Francisco. The project site currently contains a 19,739-square-foot, 32-foot high, two-story over basement parking garage, containing 58 off-street parking spaces that provide both long- and short-term parking. The project site is located in a mixed-use area developed with a combination of residential over commercial buildings and multi-family residential buildings. The project site is located in the NC-1 (Neighborhood Commercial Cluster District) zoning district and a 40-X height and bulk district. City records indicate that the existing garage building was constructed in 1920. Properties along Russell Street, a small alleyway extending west from the project site, are within the RH-2 (Residential House, Two Family) zoning district.

PROJECT DESCRIPTION:

The proposed Project described includes the conversion of the existing building into a three-story over basement, seven-unit residential building, with 17 parking spaces provided by stackers, and one approximately 860 square-foot commercial space along Hyde Street. The proposed third floor addition would increase the height of the building from 32 feet to 40 feet at the project site's Hyde Street frontage. Modifications to the building would include conversion of the front vehicular access arches into retail entrances and conversion of an arch on Russell Street into the proposed off-street parking garage entrance. The proposed 17 space parking garage would be unbundled from the residential units and would function as a combination of the following: residential parking, community monthly parking, or hourly parking, with one dedicated car-share space. Additionally, the proposed project would increase the gross-square-footage of the building from 19,739 to 25,187 square feet.

[1] California Code of Regulations, Title 14, Section 15332: Class 32 Exemptions.

PROJECT DESCRIPTION CHANGES AND BACKGROUND:

Project Background

An application for a proposed project at 1945 Hyde Street was filed with the Planning Department on March 10, 2010, involving a proposal to convert the existing building from parking garage use to seven residential units, one 860 square foot commercial unit and 14 off-street parking spaces for the associated residential units. The proposal described constructing a one-story penthouse addition to the existing two-story over basement building to increase the height from 32 feet to 40 feet. The appellant filed for Discretionary Review at the Planning Commission. To respond to community concerns raised, prior to the Discretionary Review hearing the project sponsor made several changes to the proposed project including:

- Revising the plans to provide for 17 off-street parking spaces, an addition of 3 spaces from the 14 in the original plans. All the spaces would be unbundled from the dwelling units and could be used for hourly or monthly parking and one space is proposed for car share.
- Modifying the project by sculpting the rear of the new third floor so that the mass of the building does not encroach into any significant view plane from both of the rear apartments on the top floor of a Russell Street building.
- Adding bollards along Russell Street to prevent illegal parking on the narrow sidewalk.
- Adding street trees along Russell Street for landscaping and to prevent illegal parking on the sidewalk.
- Adding street trees along Hyde Street for landscaping.
- The existing window and door at the lowest level of the Russell Street elevation were retained due to the historical association with Jack Kerouac.

Project Approved at June 16, 2011 Planning Commission Hearing

The Commission's action at the Discretionary Review hearing changed the project further to unbundle the proposed 17 off-street parking spaces from the dwelling units and function as a combination of residential parking, valet parking for local businesses, or monthly parking for surrounding residents. The Commission also modified the project to provide additional off-street parking through use of a parking valet provided that any additional parking is offered as hourly parking to local businesses. As the project was approved, a minimum of ten (10) off-street parking spaces are to be made available on an hourly or monthly basis and may be owned by the project sponsor, homeowners association or by another entity and offered for use in the following order of priority:

- Short-term parking for customers of restaurants and other retail uses in the NC-1 district along the 1900 block of Hyde Street.
- Monthly parking for residents of the neighborhood.

Additionally, the Commission required that the fourth floor be set back a minimum of 10 feet from the rear property line, and that the northerly 32 feet of the proposed fourth floor be set back a minimum of 19

feet 4 and ¾ inches from the rear property line. The roof is not permitted to extend beyond the rear wall of the proposed fourth floor.

ENVIRONMENTAL REVIEW PROCESS FOR THE PROJECT:

Section 21084 of the California Public Resources Code[2] requires that the CEQA Guidelines identify a list of classes of projects that have been determined not to have a significant effect on the environment and are exempt from further environmental review.

In response to that mandate, the State Secretary of Resources found that certain classes of projects, which are listed in CEQA Guidelines Sections 15301 through 15333,[3] do not have a significant impact on the environment, and therefore are categorically exempt from the requirement for the preparation of further environmental review.

CEQA State Guidelines Section 15332, or Class 32, provides an exemption from environmental review for in-fill development projects meeting the following conditions:

- The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- The project site has no value as habitat for endangered, rare or threatened species.
- Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- The site can be adequately served by all required utilities and public services.

The proposed Project would result in the conversion of an existing 58 off-street parking garage to a seven unit residential building with an 860 square foot commercial space and 17 off-street parking spaces. The proposed project is an in-fill development that would meet these conditions prescribed by Class 32.

CEQA Guidelines Section 15300.2 does not allow a Categorical Exemption to be used for a project where there is a reasonable possibility that the activity would have a significant effect on the environment due to unusual circumstances. The Planning Department evaluated the range of environmental issues associated with the Project and evaluated whether there were any unusual circumstances. The Department found that the project would not result in any significant environmental issues that would require further environmental review and staff identified no unusual circumstances surrounding the

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[2] 21084: Guidelines shall list classes of projects exempt from this Act.

[3] California Code of Regulations, Title 14, Chapter 3.

current proposal that would suggest a reasonable possibility of a significant effect. Under the above-cited classifications, the proposed Project is appropriately exempt from environmental review under Class 32.

APPELLANT ISSUES AND PLANNING DEPARTMENT RESPONSES:

The appellant filed a CEQA appeal of the determination of exemption from environmental review for 1945 Hyde Street on July 13, 2011. The appellant stated that the project would have a range of significant adverse effects that were not identified in the exemption or were not adequately assessed in the exemption, but did not specify aspects of the exemption that were considered inadequate. The appellant also stated that the exemption did not acknowledge the issues identified in the following submittals to the Planning Department: "Response to Notice of Project Receiving Environmental Review" submitted on July 8, 2010; "Summary of Potential Environmental Impacts of Project Requiring an EIR" submitted on August 9, 2010; and "Addendum to RHCA Response to Notice of Project Receiving Environmental Review" submitted on January 26, 2011 (these submittals are provided as Attachments C, D, and E). The appellant states that the exemption fails to address unusual circumstances. Additionally, the appeal letter states that the exemption only partially represents, or misrepresents, the proposed project actions.

The appellant did not specify how the exemption did not address the issues provided in the submittals to the Planning Department or what unusual circumstances were present that would require further environmental review. Additionally, the appellant did not provide any specifics how the exemption misrepresented or partially represented the project actions. Therefore, this appeal response address the major topics raised in the earlier submittals from the appellant included as Attachments C, D, and E. This appeal response identifies the appellant's environmental issues in summary form, followed by the Planning Department's responses.

In sum, the Planning Department responses to the Appellant's concern are that:

1. The Planning Department reviewed all submittals provided by members of the public on the proposed project and adequately analyzed all physical environmental issues raised in the submittals. Note, neighborhood controversy and opposition are not considered environmental impacts that require preparation of an EIR.
2. All transportation-related issues were addressed appropriately in the exemption, and the project would not have the potential to result in significant transportation impacts.
3. The Categorical Exemption adequately addresses the project's consistency with the applicable zoning controls and General Plan polices.
4. The Department evaluated the project site and appropriately identified on- and off-site historic resources and applicable historical significance criteria.
5. The proposed project would comply with the Secretary of the Interior's Standards for Rehabilitation and therefore would not result in a significant impact on historical resources.
6. The proposed project would result in a less-than-significant impact to historic resources, and would therefore not contribute to a cumulative impact to historic resources.

7. The proposed project would result in temporary and intermittent noise increases and possibly vibration levels around the project site from construction; however, compliance with the San Francisco Noise Ordinance and the temporary nature of construction work would lessen the impact, and construction noise would result in a less-than-significant effect on the environment.
8. The proposed project would result in a visual and aesthetic change to the surrounding neighborhood; however, it would not exceed that commonly expected in an urban setting and would not be considered an environmental impact of the proposed project.

Issue #1: Acknowledgement of issues provided in submittals to the Planning Department and potential unusual circumstances.

The appellant states that the Categorical Exemption (exemption) does not acknowledge: 1) many of the issues provided in submittals to the Planning Department; 2) extensive neighborhood interest and involvement in the project; and 3) unusual circumstances that could lead to significant environmental impacts, both local and citywide.

Response #1: The Planning Department reviewed all submittals provided by members of the public on the proposed project and adequately analyzed all CEQA environmental issues raised in the submittals. Neighborhood controversy and opposition are not considered environmental impacts that require preparation of an EIR.

The Responses to Issues #2-8, below, describe the Department's treatment of the substantive environmental issues contained in appellant's submittals to the Planning Department. These issues include land use impacts, historic resources, parking and traffic, construction noise, and aesthetic impacts.

Regarding neighborhood interest and controversy, as Section 15064(f)(4) of the CEQA Guidelines specifies: "The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence before the agency that the project may have a significant effect on the environment." The Guidelines define substantial evidence as "...facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts" (Section 15064(f)(5)).

Some of the issues raised in the submittals were not related to the project's environmental impacts, and the submittals partially acknowledged that these points addressed other issues related to the merits of the project or considerations regarding project approval. These issues include:

- Economic viability of the existing garage use;
- Benefits to the community of the existing parking garage;
- Effects of the proposed project on housing affordability in Russian Hill; and
- Building massing and design (except as they have the potential to result in impacts under CEQA).

The exemption identifies which topics are environmental issues addressed in the exemption and which are not associated with physical environmental effects (Attachment B, p. 15). The exemption fully addressed all relevant issues raised in the submittals.

As stated above, the appeal letter did not elaborate on specific concerns regarding the exemption certificate or how the project was misrepresented. Therefore it is not possible to respond further to issues raised in the appeal. The following responses address the topics related to environmental review that were raised in the submittals (Attachments C, D, and E) provided to the Department prior to issuance of the exemption.

Issue # 2: Transportation, Circulation, and Parking Impacts

The comment letters state that the project would result in transportation issues associated with loss of parking, hazards from ingress/egress on Russell Street, and congestion during construction.

Response #2: All transportation-related issues were addressed appropriately in the exemption, and the project would not have the potential to result in significant transportation impacts.

In order for a project to be exempt from environmental review under Class 32, a lead agency must determine that it would not result in significant effects related to traffic. The exemption prepared for the proposed project adequately analyzed transportation and circulation issues for the project, including: transportation impacts; transit; bicycle, and pedestrian circulation; emergency access; traffic hazards; construction traffic; and parking, and found all these impacts would be less than significant. Specifically, with regard to traffic hazards, the exemption stated that the proposed project does not include any design features that would substantially increase traffic hazards (e.g., creating a new sharp curve or dangerous intersections), and would not include any incompatible uses; therefore, there would no impacts associated with traffic hazards for the proposed project.

The proposed project would include closing two existing approximately 20-foot curb cuts along Hyde Street to convert the front exterior of the project site to create a commercial space along Hyde Street. Additionally, the proposed project would then create a new approximately 10-foot wide curb cut on an existing enclosed arch along Russell Street. This curb cut would be utilized to access the off-street parking for the project. The proposed curb cut and garage entrance along Russell Street could require cars entering the garage to complete a three-point turn to enter the residential parking garage; however, due to the low volume of trips on Russell Street associated with the proposed project, this would not be considered a substantial increased hazard. A new curb cut accessing the project's proposed garage would be the project's only transportation-related design feature, and would not be out of character or present a substantial increased hazard.

It should be noted that the proposed project would replace a parking garage with a residential building, potentially reducing the number of trips to and from the project site. It would also move vehicular ingress and egress from Hyde Street, which is a through street that serves as a fixed cable car route in the vicinity of the project site, to Russell Street. It is conceivable that traffic disruption in the vicinity of the project site could reduce as a result of the proposed project; however, the conclusions in the exemption

were not based on any assumption regarding reduction in the number of vehicles accessing the project site.

The exemption analyzed the potential impacts that would result from construction traffic and determined the impact would be less than significant. As reported in the exemption, project construction would be anticipated to last approximately 10-14 months. Construction activities would include daily vehicle trips generated by the arrival and departure of approximately 20 construction workers. The project sponsor has indicated that construction worker parking will be available inside the building for the workers on one of the three levels for a portion of project construction, and trucks would be able to load and unload using the existing 60-foot red curb space along Hyde Street in front of the project site. Hyde, Union, and Green Streets would be used to access the site to haul building materials. Construction of the proposed project is not expected to require any lane closures.

Throughout the construction period, there would be a flow of construction related trucks into and out of the site. The project sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic (DPT), the Fire Department, Muni's Street Operations and Special Events Office, and other City agencies to determine feasible traffic modifications to reduce traffic congestion and other potential traffic disruption and pedestrian circulation effects during construction of the project. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect both traffic and transit operations. Construction workers who drive to the site could cause a temporary parking demand, and the project applicant would make accommodations for construction worker parking. Therefore, it is anticipated that construction workers would be accommodated without substantially affecting area wide parking conditions. The impacts of construction on parking and traffic would be limited in scope and temporary in duration, and would not be significant. There are no unusual circumstances at the project site that would result in significant impacts from construction activities.

Therefore, the exemption adequately discusses the traffic impacts resulting from the proposed project and determined that no significant impact would occur.

Parking

As noted in the project description above, the project would convert a 58-space parking garage to a seven unit residential building with 17 parking spaces that would be made available to both project residents and others seeking long- and/or short-term parking.

The Appellant's concerns about the reduction in off-street parking are noted. The exemption discusses the parking changes that would occur from the proposed project as an informational discussion on pp. 4-5; however, loss of parking is not considered an environment effect under CEQA.

San Francisco does not consider parking supply as part of the permanent physical environment and therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Parking conditions are not static, as parking supply and demand varies from day to day, from

day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact (CEQA Guidelines § 15131(a).). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City's "Transit First" policy. The City's Transit First Policy, established in the City's Charter Section 16.102 provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably addresses potential secondary effects.

The appeal letter does not raise any additional environmental issues in regards to transportation that were not adequately analyzed in the Categorical Exemption.

Issue #3: Compatibility with applicable General Plan Policies and Zoning Controls

The comment letter asserts that the project would conflict with General Plan and other planning policies. It characterizes Planning Code requirements as the "first cut, broad envelope of permitted development" and notes that projects undergo further review and refinement to make them reflect the full range of goals for the city. The comment letter contends that the discussion of Compliance with Zoning and Plans that is part of an Initial Study under CEQA would provide the information necessary to refine the proposed project (Attachment C p. 14). Specific issues raised by the appellant include consistency of the

project with the 40-foot height limit, the Urban Design Element, the General Plan Transportation Element, and Residential Design Guidelines.

Response #3: The Categorical Exemption adequately addresses the project's consistency with the applicable zoning controls and General Plan polices.

The project complies with zoning requirements and, on balance, with the policies of the General Plan. Under the CEQA Guidelines, a project that meets applicable zoning controls and General Plan designations qualifies for a Class 32 Categorical Exemption. The proposed project is consistent with applicable requirements, and modifications to the project during the development review and approval process are not necessary for zoning compliance for the purposes of CEQA.

Section 15332 of the CEQA Guidelines states that the Class 32 exemption for In-Fill Development Projects may be used for projects that are consistent with General Plan and zoning regulations. As stated in the exemption, the proposed project would comply with the requirements of the NC-1 (Neighborhood Commercial Cluster) use district and 40-X height district. Building height was measured consistent with the requirements of Planning Code Section 260, which allows for measurement of height at the selected lot frontage for corner lots, and the building is within the maximum allowable height of 40 feet when measured from Hyde Street. Because discretionary actions such as Discretionary Review, variances, and Conditional Use approvals are provided for in the Planning Code, a project that requires such approvals is considered consistent with the Planning Code.

Properties along Russell Street adjacent to and extending west from the project site are within the RH-2 use district (Residential House, 2-family). While the 1945 Hyde Street building is of greater mass than buildings along Russell Street, a mix of building scales is common in San Francisco, particularly in locations where there is a change in zoning between adjacent lots. This mixture of building scales does not constitute an unusual circumstance that could result in a significant effect on the environment under the CEQA Guidelines Section 15300.2.

The comment letter suggests that the consistency with Zoning and Plans portion of an Initial Study would provide necessary information for analysis of the proposed project's consistency with all applicable City goals and policies and for a project decision (Comment Letter p. 14). Section 15125(d) of the CEQA Guidelines states that the Environmental Setting for a proposed project must include a discussion of any inconsistencies between a proposed project and applicable plans. This is not part of the assessment of physical environmental impacts of a proposed project. This description does not provide the review of applicable policies that is part of the permit review process. Any desire for a discussion of any inconsistencies with applicable plans would not in and of itself disqualify a project from receiving a categorical exemption.

It is common for projects to undergo modifications through the project review and approval processes. Such modifications are not necessary to avoid demonstrable significant impacts, but might be desirable for a variety of reasons. The proposed project was modified through the addition of limited community parking use and the creation of setbacks along the northern property line for the fourth story addition, ranging from 10 to over 19 feet. These modifications were applied by the Planning Commission in

response to community concerns about the project, but were not required to avoid significant impacts or to achieve compliance with zoning, such that the project would have been ineligible for a Class 32 exemption without these modifications.

Issue #4: Historic associations of project site

The Appellant states that the Department failed to identify all of the criteria by which the building at 1945 Hyde Street is eligible under as a historic resource. The appellant states that the building contributes to not one, but two historic districts (Russell Street Reconstruction Historic District and a noncontiguous district of 1920s-era automobile garage structures). The appellant claims that 1945 Hyde Street is also individually significant for its association with Jack Kerouac, Neal Cassidy, Earl Swenson and Marcel *et* Henri.

Response #4: The Department evaluated the project site and appropriately identified on- and off-site historic resources and applicable historical significance criteria.

The Department HRER identifies the subject building at 1945 Hyde Street as a historic resource eligible for listing on the California Register for two reasons:

1. 1945 Hyde Street is an excellent and well-preserved example of a 1920s automobile garage with Mission Revival and Secessionist styles meeting the California Register of Historic Resource (CRHR) Criteria No. 3 (architecture/design).
2. 1945 Hyde Street may contribute to a significant context of neighborhood-serving automobile garages structures from the first half of the 20th century.

Russell Street, with several buildings listed on the 1976 Architectural Survey and on the Here Today survey could be eligible for listing on the California Register. However, the Russell Street Reconstruction Historic District, with buildings primarily built between 1906 and 1908 (with two buildings from the 1910s) would not include the subject property at 1945 Hyde Street for several reasons. First, the Russell Street Historic District is significant for its reconstruction-era architecture from the period between 1906 and 1915; 1945 Hyde Street was built in 1920 and falls outside of the period of significance. Second, the property types of the Russell Street Historic District are small-scale, wood-frame residential buildings. 1945 Hyde Street is a commercial building and is not consistent with the residential property types in this district. Third, the historic connection between the Russell Street buildings and the 1945 Hyde Street building is tenuous, and does not meet minimum thresholds for significance per California Register standards. While the use of the subject building at 1945 Hyde Street has been continuously used for parking to serve the immediate neighborhood, this use does not make the building historically significant for the purposes of CEQA.

The appellant states that the building is significant for its association with important and significant persons. Properties eligible for their associations with significant persons (Criterion 2) are those associated with a person's productive life or reflecting the time period when he or she achieved significance. The individual's association with the property must be documented by accepted methods of

historical or archeological research, including written or oral history. Speculative associations are not acceptable.

The building at 1945 Hyde Street provided the backdrop of a photograph of Neal Cassady and Jack Kerouac c. 1952 depicting the pair against the concrete wall, with the steel window[4] in the basement as the sole identifying element of the building in the photo. The appellants claim that the existence of the photograph makes the subject property significant; however, this indirect association does not qualify the building for listing on the California Register per Criterion 2 as stated in the above paragraph.

By contrast, #29 Russell Street has a direct association as the home of Carolyn and Neal Cassady, and is associated with the Beat poet Jack Kerouac who lived with the couple at the time. 29 Russell Street would qualify for its association with Jack Kerouac because that is where the poet wrote portions of his work "Visions of Cody" while staying there between December 1951 and April 1952.[5]

Similarly, the appellant claims of associative significance with Earl Swenson and Marcel *et* Henri with the subject property are unsubstantiated. Neither had direct associations with 1945 Hyde Street, as their respective businesses were in nearby buildings. The appellant has not provided substantial evidence to suggest an association between 1945 Hyde Street and these aforementioned persons.

Issue #5: Compliance with the Secretary of the Interior's Standards for Rehabilitation.
The appellant claims the proposed project does not comply with the *Secretary of the Interior's Standards for Rehabilitation of Historic Properties (Standards)*. The appellant further claims that the existing 90-year old community parking use is historic, and therefore cannot be changed.

Response #5: The proposed project would comply with the Secretary of the Interior's Standards for Rehabilitation and therefore would not result in a significant impact on historical resources.

Under the CEQA Guidelines, projects that meet the *Standards* are assumed to have no significant adverse impact to historic resources. Rehabilitation, as defined by the Secretary of the Interior, 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 which convey its historical, cultural, or architectural values." *Standard* 1 states that a property shall be "...placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment" if it is not maintained in its historic use, thereby enabling the change of use in a historic property. In other words, the intent of the *Standards* is not to freeze the appearance of a building in time, but to protect the character-defining features of the building so that its historical significance will continue to be conveyed.

The appellant claims that the proposed project does not comply with the Secretary of the Interior's Standards. The appellant further claims that the existing 90-year old community parking land use is itself

[4] This steel window will be retained and rehabilitated.

a historic characteristic, and therefore cannot be changed. The submittal included an unedited draft undergraduate course report addressing historic garage buildings in San Francisco, titled "Educate, Preserve, Reuse: The Good (Not Great) Garage Buildings of San Francisco" (Mark Kessler, University of California, Davis Design Program, December 2008), referred to in the appellant's submittal and in this response as the "Kessler Report".

The exemption found that 1945 Hyde Street appears to be eligible for listing in the California Register of Historical Resources as an individual resource under Criteria 3 (Architecture) and as a contributor to a potential noncontiguous historic district of neighborhood-serving automobile parking garages built in the first half of the 20th century, if such a district was proposed. [6] The Planning Department preservation staff assessed whether the proposed project, which would include conversion of the property from a parking garage to a mixed-use residential and commercial building with a third story addition, would result in a substantial adverse change to the historical resource. The exemption found that the proposed project would not cause a substantial adverse change in the resource such that the significance of the building would be materially impaired. The following is an analysis of how the proposed project complies with the Secretary of the Interior's Standards:

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.* The proposed project meets this standard because:

- The proposed project would retain the physical character-defining features of the automobile garage structure at the site.
- The proposed project would adaptively reuse the building for residential, retail and parking uses.
- The new residential, retail and parking uses would require minimal changes to the defining characteristics of the building, including: overall scale and visible massing from Hyde Street, stepped parapet, decorative brick detailing, arched openings, large industrial style steel sash windows, and general spatial relationship to adjacent buildings and the surrounding neighborhood.

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.* The proposed project meets this standard because:

- The proposed project would retain all of the identified character-defining features of the property. The steel sash window at the basement level of the Russell Street elevation which can be seen in the c. 1952 photograph of Jack Kerouac and Neal Cassady will be retained and rehabilitated.
- The basement-level would retain its parking use and industrial character, while the upper two floors would retain most of its exterior industrial character.

[6] Memorandum from Moses Corrette, Preservation Technical Specialist, to Chelsea Fordham, Environmental Planner, Major Environmental Analysis, July 8, 2010. This document is on file and is available for review as part of Case File No. 2010.0162E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA.

- The proposed project will avoid altering the spaces that characterize the property because the floors, ceilings and floor-to-ceiling heights on the basement and first levels will be retained, while at the second floor will be lowered by approximately two feet.
- The materials, architectural features, arched openings and expressive Hyde Street ornamentation will be retained.

Standard 3: *Each property shall 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.* The proposed project meets this standard because:

- The proposed project would not introduce conjectural features or elements to the building.
- The proposed vertical addition would be contemporary and distinguished from the existing 1920 construction.
- The existing industrial character of the building's exterior would not be altered.

Standard 4: *Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.* The proposed project meets this standard because:

- This Standard does not apply to the proposed project. The existing building is the same as it was originally constructed.

Standard 5: *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.* The proposed project meets this standard because:

- The distinctive features of the building would be retained or restored, including decorative brick detailing, arched openings, industrial style metal windows, and the exterior cast plaster/concrete ornament between the floors and at the shaped parapet.

Standard 6: *Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall 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.* The proposed project meets this standard because:

- Deteriorated historic features would be repaired as part of the project.
- The remaining existing steel sash windows will be replaced due to extensive deterioration and distortion. A condition survey of all existing windows has been conducted and is available in the case docket. The report revealed there is overall heavy corrosion, deterioration, and distortion, as well as separation of the frames from the concrete openings. The project proposes to replace the existing steel sash windows in-kind to replicate the existing sash profile and glazing pattern.
- The steel window at the basement level of the Russell Street elevation which can be seen in the c. 1952 photograph of Jack Kerouac and Neal Cassady will be retained and rehabilitated.
- The arched opening will be retained and re-purposed to allow for a residential entrance / lobby.

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.* The proposed project meets this standard because:

- The proposed project, as currently designed, does not include any known chemical or physical treatments to the subject property. No sand or water blasting, or other harsh treatments are proposed.

Standard 8: *Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.* The proposed project meets this standard because:

- The proposed project includes a small amount of excavation to accommodate the subterranean garage parking apparatus, but no archaeological resources are expected to be encountered. The Planning Department's Preliminary Archeological Review for the proposed project found "No effects to archeological resources expected."

Standard 9: *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.* The proposed project meets this standard because:

- The proposed new vertical addition would be designed in a contemporary style that uses a simple vocabulary in order to create compatible design that is distinguishable as a new feature within the site.
- The vertical addition would be set back from the Hyde Street elevation by more than 12 feet and rise approximately 7 feet above the parapet height on the Russell Street elevation.
- A roof terrace with 42" clear glass railing would be set back approximately 15 feet from the Russell Street building wall, which would not be visible from the public right-of-way.

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.* The proposed project meets this standard because:

- The addition is reversible and could be removed entirely in the future without harming the historic integrity of the building.

As described above, the project is consistent with the *Standards* and would not cause an adverse change to the resource. There is no prohibition of adaptive reuse or placing a new use to a historic building as long as the character-defining features of the building are maintained. The proposed project would adaptively reuse the historic building for residential, retail and parking purposes in a manner that is consistent with the *Standards*.

The Kessler Report contends that an important aspect of the early 20th Century garage buildings is the relationship between their interior space and their external facades, and that preservation of the internal spatial relationships is an important aspect of preservation of these resources. The report does not evaluate the building at 1945 Hyde Street, or the proposed project. The Department evaluated the property and concluded that non-interior features were character defining, and that the proposed project would retain all exterior character-defining features. Moreover, the HRER notes that the proposed project would minimally alter the relationship of interior spaces because the floors, ceilings and floor-to-ceiling heights on the basement and first levels would be retained, while at the second floor ceilings

would be lowered by approximately two feet. While not considered character defining, these spatial relationships would be substantially maintained under the proposed project.

As described above, the project is consistent with the *Standards* and would not cause an adverse change to the resource. Standard 1 allows for a change in use in a historic building, and no aspect of CEQA or the Standards prohibits adaptive reuse or conversion of use within a historic building. The proposed project would adaptively reuse the historic building for residential, retail and parking purposes in a manner that is consistent with the *Standards*.

Therefore, based upon the project's consistency with the *Standards*, and the fact that the project would not would result in a substantial adverse change to the historical resource, the impact was determined to be less-than-significant.

Issue #6: Cumulative Impacts to Historic Resources

The appellant claims the proposed project contributes to several off-site cumulative impacts to both the noncontiguous historic district of 1920s-era automobile garage structures and the Russell Street Reconstruction Historic District.

Response #6: The proposed project would result in a less-than-significant impact to historic resources, and would therefore not contribute to a cumulative impact to historic resources.

Because the proposed project complies with the *Standards*, no impact is identified that could contribute to a cumulative effect. The Department maintains that the proposed project will not adversely impact the adjacent Russell Street Historic District nor will it adversely impact the ability of 1945 Hyde Street to convey its historic significance as an excellent and well-preserved example of a 1920s automobile garage. While the vertical addition will be visible from the Russell Street Historic District, the integrity of the district would not be adversely impacted.

1945 Hyde Street was constructed in 1920. Approximately 120 garage structures were listed in the San Francisco City Directory that year.[7] By 1928, 300 garage structures were listed in the City Directory and roughly half of these structures still exist.[8] With approximately 150 extant 1920s-era garage structures in San Francisco, the historic context is well-represented. 1945 Hyde Street, as one of the assumed 150 properties, is proposed for a rehabilitation that meets the *Standards* and is consistent with CEQA guidelines. The rehabilitation of the building therefore would not contribute to any off-site cumulative impacts to the Russell Street Historic District or the noncontiguous historic district of 1920s-era automobile garage structures.

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[7] Crocker-Langley San Francisco City Directory 1920, (San Francisco: H.S. Crocker Co.. Inc., 1920).

[8] Mark Kessler, "Educate, Preserve, Reuse: The Good (Not Great) Garage Buildings of San Francisco," University of California, Davis AIA Report on University Research. Presented to the San Francisco Department of Planning, December 11, 2008.

Issue #7: Noise Impacts during construction.

The appellant states that the project would result in temporary or periodic increase in ambient noise levels from project construction in the project vicinity.

Response #7: The proposed project would result in temporary and intermittent noise increases and possibly vibration levels around the project site from construction; however, compliance with the San Francisco Noise Ordinance and the temporary nature of construction work would lessen the impact, and construction noise would result- in a less-than-significant effect on the environment.

The exemption discusses the proposed project's impacts resulting from construction noise and states that the project would result in temporary and intermittent noise increases and possibly vibration levels increases around the project site, which may be considered an annoyance by occupants of nearby properties. Noise and vibration levels over the estimated 10-14 month construction period would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Construction noises associated with the proposed project would include excavation, truck traffic, and finishing. Of these, excavation, and site work would likely generate the most construction-related noise. Throughout the construction period there would be truck traffic to and from the site, hauling away the excavated materials and debris, or delivering building materials. It is anticipated that the construction hours would be working hours from 7AM to 5PM during the week, with possible limited work during weekends, in accordance with applicable regulations.

The San Francisco Noise Ordinance (Article 29 of the Police Code) regulates construction-related noise. The Noise Ordinance is required by law and would serve to avoid significant negative impacts of the proposed project on sensitive receptors. Sensitive receptors are people requiring quiet, for sleep or concentration, such as residences, schools, or hospitals. The nearest sensitive receptors to the project site would be nearby residents, including residents of the buildings immediately west of the project site along Russell Street, and north and south along Hyde Street. Construction activities other than pile driving typically generate noise levels no greater than 90 dBA (for instance, for excavation) at 50 feet from the activity, while other activities, such as concrete work, are much less noisy. Closed windows typically can reduce daytime interior noise levels to an acceptable level. Therefore, for nearby sensitive receptors, although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly experienced in an urban environment, and would not be considered significant. The proposed building would not use pile driving. The proposed project would not create unusual levels of ground borne vibration that would disturb nearby residents or businesses, and vibration impacts would be less than significant. Given the above-mentioned City noise regulations and the temporary nature of construction work, construction noise would have a less-than-significant effect on the environment.

The appellant contends (Attachment C, contend (p. 19) that the Noise Ordinance would not provide sufficient protection from construction noise because the older residences along Russell Street are not insulated against noise. As stated in the exemption, existing average noise levels at the project site are in the range of 65-75dBA. San Francisco contains a range of building ages and types, and the presence of older structures is not considered an unusual circumstance that would render the Noise Ordinance

protections insufficient to avoid a significant impact in the case of the proposed project. Therefore, construction noise impacts would be less than significant and the issuance of a Class 32 exemption is appropriate.

The appeal letter does not raise any additional environmental issues from construction noise that were not adequately analyzed in the Categorical Exemption.

Issue #8: Aesthetics, and Light and Glare

The comment letters state that the project would substantially degrade the existing visual quality of the site and cause an aesthetic impact to Russell and Union Street. Additionally, the comment letters state that the project would create the potential for significant nighttime light and glare impacts.

Response #8: The proposed project would result in a visual and aesthetic change to the surrounding neighborhood; however, it would not exceed that commonly expected in an urban setting and would not be considered a significant environmental impact of the proposed project.

Aesthetic impacts are not specified in the CEQA Guidelines as issues to be addressed in the context of a Class 32 exemption (as opposed to other topics such as transportation, noise, and air quality), and there are no unusual circumstances at the project site that would create the potential for significant impacts. The Class 32 exemption presumes that in-fill development is appropriate within the urban context. Nevertheless, in response to the issues raised in the appellant's submittals, the exemption analyzed the proposed project's impacts to aesthetics and light and glare and it was determined that the proposed project would not result in a significant impact to aesthetics, community character, and light and glare.

The proposed project's specific building design and aesthetic were considered during the Planning Commission's approval and design review process. The proposed project would convert an existing two-story over basement parking garage into a three-story over basement mixed-use building with seven residential units and a ground-floor commercial space. This change would include construction of a third floor addition that would increase the building's height from 32 to 40 feet. The exemption stated that under CEQA, a proposed project would be considered to have a significant adverse effect on visual quality only if it would cause a substantial and demonstrable negative change. The proposed increase in height and change of use would not substantially alter the existing character of the surrounding neighborhood, which is primarily two-to three-story multi-family residential buildings and mixed-use buildings with small-scale ground-floor commercial uses and residential above.

The proposed project would be visible from locations within the neighborhood, including Russell and Union Streets, particularly from the properties adjoining the project site. The change in views would not exceed that commonly expected in an urban setting and would not be considered an environmental impact of the proposed project.

Additionally, the project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass at the pedestrian level. Mirrored glass would not be used in the building. The project's lighting is consistent with exterior lighting typical of other buildings in the project vicinity. For these reasons, the proposed project would not generate obtrusive light or glare that would

substantially impact other properties. Light and glare would not be considered a significant impact of the project. For these reasons, the project would not have a significant impact on visual quality under CEQA.

The appeal letter does not raise any additional environmental issues from aesthetics impacts that were not adequately analyzed in the Categorical Exemption.

CONCLUSION

Because the appeal letter did not identify aspects of the Class 32 exemption that the appellant considered inadequate, it is not possible to address any specific concerns regarding the issuance of the exemption. Additionally, the appeal letter did not specify how the exemption misrepresented the proposed project. The comment letters that are cited in the appeal letter make a variety of points about the characteristics of the project site and its vicinity, addressing topics that include transportation, plans and policies, noise, and aesthetics. The Department's exemption adequately addresses each of these topics and supports a conclusion that the project qualifies for an exemption under Section 15332 of the CEQA Guidelines and no significant impacts would occur. The appeal letter does not raise new issues that were not disclosed or discussed in the exemption and does not provide evidence to substantiate a finding that the proposed project would result in significant environmental impacts. As such, the conclusions of the exemption remain current and valid. The Planning Department has appropriately determined that the proposed project would be exempt under Class 32.

Attachment A: Letter of Appeal (July 13, 2011)

Russian Hill Community Association

1134 Green St. San Francisco, CA 94109 415-776-2014 www.rhcasf.com

Angela Calvillo
Clerk of the Ward
Board of Supervisors
City Hall, Room 244
San Francisco, CA 94102

July 13, 2011

Subject: CEQA Appeal - Certificate of Determination Exemption from Environmental Review
1945 Hyde Street - Case No: 2010.0162E

Dear Ms. Calvillo:

The Russian Hill Community Association (RHCA) is appealing the issuance of a Categorical Exemption, for the proposed 1945 Hyde St. Project, Case No: 2010.01623, on the basis that the proposed project would have a range of significant adverse environmental effects that are not identified or adequately assessed in the rationale supporting the Categorical Exemption determination (attached).

The RHCA has participated extensively in a neighborhood review of the proposed project and its potential impacts. The RHCA has delivered these comments, concerns, and detailed assessments to the Planning Department, beginning with the RHCA "Response to Notice of Project Receiving Environmental Review," a 70 page document submitted 7/8/10, a "Summary of Potential Environmental Impacts of Project Requiring an EIR," a 4 page document submitted 8/9/10, and an 8 page addendum to the "Response to Notice of Project Receiving Environmental Review," submitted 1/26/11, (all available in the case file at the Planning Department.) The Categorical Exemption does not acknowledge many of these issues, nor the extensive neighborhood interest and involvement that this controversial project has generated over the past 13 months, and in fact, down plays them (see section on Neighborhood Concerns, page 15 of the determination.)

Compounding matters, the Categorical Exemption only partially represents—and in some cases misrepresents—the proposed action. These omissions are the source of a range of insufficiently evaluated impacts. Along the same lines, the Categorical Exemption fails to address several **unusual circumstances** that lead to significant environmental impacts. These **unusual contextual circumstances** are both local and citywide.

As such, the proposed project would not meet all the conditions that CEQA requires as the basis for exemptions generally, and for Class 32 exemptions (CEQA Guidelines Section 15032, in-fill projects) in particular. Either a Mitigated Negative Declaration or an Environmental Impact Report would appear to be the appropriate vehicles for the 1945 Hyde Street project's compliance with CEQA environmental review requirements.

Please find attached the following:

- a copy of the minutes of the action taken by the Planning Commission at the 6/16/11 DR hearing
- a copy of the CatEx determination, (signed on 1/27/10, electronically sent to the RHCA on 2/4/11, and received by the RHCA via USPS on 2/12/11)
- the Neighborhood Organization Fee waiver request form
- a check for $500 made out to SF Planning Department

We appreciate your attention to this matter and please let us know if you have any questions.

Sincerely,

Jamie Cherry

Jamie Cherry
Co-Chair, RHCA 1945 Hyde Street Project Team, jcherry@rhcasf.com

SAN FRANCISCO

PLANNING COMMISSION

Meeting Minutes

Commission Chambers - Room 400

City Hall, 1 Dr. Carlton B. Goodlett Place

Thursday, June 16, 2011

12:00 PM

Regular Meeting

COMMISSIONERS PRESENT: Olague, Antonini, Fong, Moore, Sugaya

COMMISSONERS ABSENT: Miguel and Borden

THE MEETING WAS CALLED TO ORDER BY PRESIDENT OLAGUE AT: 12:15 PM

STAFF IN ATTENDANCE: John Rahaim – Director of Planning, Scott Sanchez – Zoning Administrator, Corey Teague, Chelsea Fordham, Rich Sucre, Rick Crawford, Glen Cabreros, Michael E. Smith, Kirsten Dischinger, Linda D. Avery – Commission Secretary

A. CONSIDERATION OF ITEMS PROPOSED FOR CONTINUANCE

The Commission will consider a request for continuance to a later date. The Commission may choose to continue the item to the date proposed below, to continue the item to another date, or to hear the item on this calendar.

1. 2009.0651C (B. FU: (415) 558-6613)

2045-2121 EVANS STREET - west side between Cesar Chavez and Napoleon Streets, Lots 001B & 002 in Assessor's Block 4343 - **Request for Conditional Use Authorization** under Planning Code Sections 157 and 303 to allow parking in excess of accessory amounts for the proposed Restaurant Depot building expansion, within the PDR-2 (Core Production, Distribution, and Repair) Zoning District

10a. 2010.0162DDV (R. CRAWFORD: (415) 558-6358)
1945 HYDE STREET - west side at Russell Street; Lot 002 in Assessor's Block 0123 - **Requests for Discretionary Review** of Building Permit Application No. 2010 0517 2557 proposing to convert a 58 stall parking garage to a mixed use building with 7 dwelling units, 14 parking spaces and a commercial unit. The project will add a one-story vertical addition to the top of the building that will be setback 12 feet from the front wall and 10 feet from the rear property line within the NC-1 (Neighborhood Commercial Cluster) Zoning District and 40-X Height and Bulk District.
Staff Analysis: Full Discretionary Review
Preliminary Recommendation: Do not take Discretionary Review and approve
(Continued from Regular Meeting of May 19, 2011)

SPEAKERS: Tim Colen, David Meckel, Michelle Sudduth, Kathleen Courtney, Scott Edmondson, Sarah Taber, Ben DeVeres, Joe Harney, Harvey Hacker, Joanne Allen, Richard Lerner, John Willis, Zoe Brillinger, Kevin Webb, Amy Boon, Steve Vettel, Jamie Cherry
ACTION: The Commission took DR and approved as amended: to unbundle parking; eliminate the awning; add setback footage
AYES: Olague, Antonini, Fong, Moore, Sugaya
ABSENT: Miguel and Borden
DRA: 0216

10b. 2010.0162DDV (R. CRAWFORD: (415) 558-6358)
1945 HYDE STREET - west side at Russell Street; Lot 002 in Assessor's Block 0123 - **Request for Variance,** pursuant to Planning Code Section 134 to modify the rear yard requirement in the NC-1 District. The project proposes to convert a 58 stall parking garage to a mixed

use building with 7 dwelling units, 14 parking spaces and a commercial unit. The project will add a one-story vertical addition to the top of the building that will be setback 10 feet from the rear property line where a setback of 25 feet is required within the NC-1 (Neighborhood Commercial Cluster) Zoning District and 40-X Height and Bulk District.
(Continued from Regular Meeting of May 19, 2011)

SPEAKERS: Same as those listed for item 10a
ACTION: The Zoning Administrator closed the public hearing and granted the variance subject to the standard conditions of approval

Attachment B: Certificate of Exemption from Environmental Review

SAN FRANCISCO
PLANNING DEPARTMENT

Certificate of Determination
Exemption from Environmental Review

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Case No.:	2010.0162E
Project Title:	1945 Hyde Street
Zoning:	NC-1 (Neighborhood Commercial Cluster District) 40-X Height and Bulk District
Block/Lot:	0123/002
Lot Size:	6,686 square feet
Project Sponsor	Steven Vettel, Authorized Agent for Owner John Willis, (415) 954-4902
Staff Contact:	Chelsea Fordham – (415) 575-9071 Chelsea.Fordham@sfgov.org

PROJECT DESCRIPTION:

The 6,686 square-foot project site is located on the west side of Hyde Street on the corner of Hyde and Russell Streets, with Union Street to the north and Green Street to the south, in the Russian Hill neighborhood of San Francisco. The project site currently contains a 19,739-square-foot, two-story over basement, parking garage constructed in 1920, containing 58 off-street parking spaces providing both long-term and short term parking.

EXEMPT STATUS:

Categorical Exemption, Class 32 [State CEQA Guidelines Section 15332]

REMARKS:

Please see the next page.

DETERMINATION:

I do hereby certify that the above determination has been made pursuant to State and Local requirements.

BILL WYCKO
Environmental Review Officer

January 27, 2011
Date

cc: Steve Vettel, Project Sponsor
Rick Crawford, Neighborhood Planning, Northeast Team
Moses Corrette, Preservation Planner
Supervisor David Chiu, District 3
VirnaLiza Byrd, M.D.F
Historic Preservation Distribution List

PROJECT DESCRIPTION (CONTINUED):

The proposed project would convert the building into a three-story over basement, seven- unit residential building, with 14 parking spaces provided by stackers, and one approximately 860 square-foot commercial space along Hyde Street. The existing height of the building is 32 feet and the proposed third floor addition would increase the height to 40 feet. Modification to the building would include enclosure of the front arches for vehicular access into retail entrances and conversion of an arch on Russell Street into the proposed off-street parking garage entrance. Additionally, the proposed project would increase the gross-square-footage of the building from 19,739 to 25,187 square feet. The project site is located in the NC-1 (Neighborhood Commercial Cluster District) zoning district and a 40-X height and bulk district.

California Environmental Quality Act (CEQA) State Guidelines Section 15332, or Class 32, provides an exemption from environmental review for in-fill development projects that meet the following conditions:

a) The project is consistent with applicable general plan designations and policies as well as with applicable zoning designations.

Zoning: The project site is located within the Neighborhood Commercial Cluster District (NC-1) zoning district. The proposed residential and retail uses are principally permitted within the NC-1 zoning district. The proposed third story addition would be 40 feet tall, which is the permitted height for the project site.

Parking: Per section 151 of the Planning Code, the proposed project would be required to provide one off-street parking space for each dwelling unit and no off-street parking spaces for the commercial space because the commercial space will not exceed an occupied floor area of 5,000 square feet. The proposed project includes a total of 14 off-street parking spaces for the residential units.

Open Space: The open space requirement defined in *Planning Code* Section 135 requires 100 square feet of private open space or 133 square feet of common usable open space for each dwelling unit. The proposed project would satisfy this requirement with 671 square feet of common open space in the form of a roof deck for five of the dwelling units, and 1,356 square feet of private open space in the form of terraces for two of the dwelling units.

b) The development occurs within city limits on a site of less than five acres surrounded by urban uses.

The 6,686-square-foot (approximately 0.15 acre) project site is located within a fully developed area of San Francisco. The surrounding area is densely developed with residential, commercial, and retail uses. The proposed project would involve reuse of an existing building from a parking garage to a mixed-use building with residential and commercial uses; therefore, the proposed project would be properly characterized as in-fill development completely surrounded by urban uses.

c) The project site has no habitat for endangered, rare or threatened species.

The subject property is a garage building located within a densely developed urban area. The project site does not currently support any vegetation or habitat for endangered, rare, or threatened species.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic: The project site is located on the west side of Hyde Street, on the block bounded by Russell and Union Streets to the north, Green Street to the south, Larkin Street to the west, and Leavenworth Street to the east. Street parking is available on all adjacent streets, including two-hour, and residential permit parking with weekly parking restrictions for street cleaning.

Using the Planning Department's *2002 Transportation Impact Analysis Guidelines for Environmental Review* (October 2002), the proposed project is estimated to generate approximately 199 daily person-trips for the proposed residential and commercial uses.[1] Of these, about 24 daily person-trips would be during the p.m. peak-hour. These trips would be distributed among various modes of transportation, including single occupancy vehicles, carpools, public transit, walking, and bicycling. Of the 24 p.m. peak-hour person-trips for the proposed uses, nine would be vehicle trips, seven would be transit trips, six would be walking, and two trips would be through some other mode of transportation such as bicycle. Mode split and vehicle occupancy data for both retail and residential uses were obtained from the 2000 Census "Journey to Work" and Citywide Travel Behavior Survey figures. The incremental increase in traffic would not be considered a substantial increase relative to the existing capacity of the local street system. The change in traffic in the project area as a result of the proposed project would be indiscernible to most drivers. The proposed project would add a negligible increment to the cumulative long-term traffic increase on the neighborhood's roadway network. Thus, the project would not substantially affect the neighborhood's existing traffic conditions.

The project would also include closing two existing curb cuts along Hyde Street, which is used to access the parking garage, and create a new curb cut along Russell Street to access the residential off-street parking garage. Russell Street is a one-way street that extends from Hyde Street west to a mid-block alley that is accessed from Union and Green Streets. The enclosure of the curb cuts along Hyde Street and creation of a new curb cut could result in the redistribution of vehicle trips from Hyde Street to Russell Street, but not in the larger vicinity, and the relatively low volume along Russell Street would mean that the change in traffic circulation at the site would not be expected to result in any significant conflicts with other vehicles or pedestrians or bicycles, and no significant effects would ensue. Removal of the Hyde Street curb cuts would reduce the potential for vehicle conflicts on Hyde Street, which has constraints resulting from the cable car tracks running along this corridor. Therefore, effect on traffic flow would be considered less-than-significant.

[1] *Transportation Impact Analysis Guidelines, Transportation Calculations.* This document is available for public review as part of Case No. 2010.0162E at 1650 Mission Street, Suite 400, San Francisco, CA, 94103.

Transit, Bicycle and Pedestrian Circulation. The project is expected to generate 51 daily transit person-trips, seven of which would occur in the p.m. peak hour. The project site is well served by Muni, and is within one block of the 41-Union and 45-Union/Stockton lines, two blocks of the 19-Polk line, and directly in front of the Powell-Hyde cable car route. The project site is within two blocks of Bicycle Route #25-Polk. Additionally, sidewalks are wide enough to support the anticipated increase in pedestrian use. The proposed project would not result in impacts to the Powell-Hyde cable car route because the project would remove the vehicular entrances along Hyde Street, and place commercial uses along Hyde Street, which would not result in transit or pedestrian conflicts with the cable car. Thus, the project would not substantially affect the neighborhood's existing conditions for transit, bicycle, and pedestrian circulation.

Emergency Access. Existing emergency access to the project site would be provided from both Hyde and Russell Streets. The proposed project would not interfere with existing traffic circulation or cause major traffic hazards, nor have a significant effect on traffic-related hazards or emergency access provisions. The proposed project would be required to meet the standards contained in the Building and Fire Codes, and the San Francisco Building and Fire Departments would review the final building plans to ensure sufficient access and safety. Therefore, the project would not result in impact on emergency access conditions.

Increased Traffic Hazards. The proposed project does not include any design features that would substantially increase traffic hazards (e.g., creating a new sharp curve or dangerous intersections), and would not include any incompatible uses; therefore, there would no impacts associated with traffic hazards for the proposed project. The proposed project would include closing two existing approximately 20-foot curb cuts along Hyde Street to convert the front exterior of the project site to create a commercial space along Hyde Street. Additionally, the proposed project would then create a new approximately 10-foot wide curb cut on an existing enclosed arch along Russell Street. This curb cut would be utilized to access the off-street residential parking for the project. The proposed curb cut and garage entrance along Russell Street could require cars entering the garage to complete a three point turn to enter the residential parking garage; however, due to the low volume of trips on Russell Street associated with the proposed project, this would not be considered a substantial increased hazard. A new curb cut accessing the project's proposed garage would be the project's only transportation-related design feature, and would not be out of character or present a substantial increased hazard.

Parking. The proposed project would change the use of the project site from a parking garage building with a 58 off-street parking spaces for both long-term and short-term to a mixed-use building with 14 off-street parking spaces for the residential use. Therefore, the proposed project would result in the loss of 58 off-street parking spaces for long term and short term parking for retail and residential uses within the vicinity of the project site. The proposed project would generate the demand for 13 parking spaces, and would provide 14 spaces for a surplus of one parking space.

San Francisco does not consider parking supply as part of the permanent physical environment and therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Parking conditions are not static, as parking supply and demand varies from day to day, from

day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact. (CEQA Guidelines § 15131(a).) The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City's "Transit First" policy. The City's Transit First Policy, established in the City's Charter Section 16.102 provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably addresses potential secondary effects.

Construction Impacts. The proposed project would be constructed over a period anticipated to last approximately 10-14 months. Construction activities would include daily vehicle trips generated by the arrival and departure of construction workers. Approximately 20 workers would commute to the construction site each day for approximately 10-14 months for renovation and construction of the proposed project. Trucks would haul excavated materials away from the site and haul assembly materials to the site. Hyde, Union, and Green Streets would be used to access the site to haul building materials. Construction of the proposed project would not require any lane closures.

Throughout the construction period, there would be a flow of construction-related trucks into and out of the site. The project sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic (DPT), the Fire Department, Muni's Street Operations and Special Events Office, and other City agencies to determine feasible traffic modifications to reduce traffic congestion and other potential traffic disruption and pedestrian circulation effects during construction of the project. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect

both traffic and transit operations. Construction workers who drive to the site could cause a temporary parking demand, and the project applicant would make accommodations for construction worker parking. Therefore, it is anticipated that construction workers would be accommodated without substantially affecting area wide parking conditions. The impacts of construction on parking and traffic would be limited in scope and temporary in duration, and would not be significant.

Noise: The *San Francisco General Plan* noise guidelines indicate that any new residential development in areas with noise levels above 60 dBA[2] should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features are included in the design. In areas where noise levels exceed 65 dBA, a detailed analysis of noise reduction requirements must be done and needed noise insulation features included in the design.

Title 24 of the California Code of Regulations establishes uniform noise insulation standards for multi-unit residential projects. This state regulation requires meeting an interior standard of 45 dBA in any habitable room. DBI would review the final building plans to ensure that the building wall and floor/ceiling assemblies for the residential development meet State standards regarding sound transmission for residents.

An environmental noise study was prepared for the proposed project to determine whether the project can meet the applicable standards of Title 24 and the *San Francisco General Plan.*[3] Additionally, the noise study provides a quantification of the noise environment within the vicinity of the project site. The noise study reported that the dominant noise sources within the vicinity of the project site are vehicular traffic along Hyde Street, noise from the cable car system (i.e. cable whine), and cable car passbys. Three 48-hour noise measurements recorded a day-night noise average of between 65 – 75 dBA (Ldn). This is within the range forecast by noise modeling undertaken by the Department of Public Health, which predicts a traffic noise level above 70 dBA (Ldn).

Given the noise environment at the project site, the noise study concluded that it would appear that conventional residential construction, which would include sound-rated windows (which typically offer 25 to 30 dBA noise reduction), and a ventilation system would be necessary to ensure an interior noise environment in habitable rooms of 45 dBA (Ldn) as required by the San Francisco Building Code.[4] Therefore, the noise study demonstrates that acceptable interior noise levels consistent with those in the Title 24 standards can be attained by the proposed project and no further acoustical analysis or engineering is required to comply with this requirement.

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[2] The dBA, or A weighted decibel, refers to a scale of noise measurement that approximates the range of sensitivity of the human ear to sounds of different frequencies. On this scale, the normal range of human hearing extends from about 0 dBA to about 140 dBA. A 10-dBA increase in the level of a continuous noise represents a perceived doubling of loudness.

3 Charles M. Salter Associates Inc., March 30, 2010. Environmental Noise Study – 1945 Hyde Street, prepared for Luke Ogrydziak, Ogrydziak/Prillinger Architects. This document is on file and is available for review as part of Case File No. 2010.0162E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA.

4 Charles M. Salter Associates Inc., March 30, 2010. Ibid

Noises generated by residential and commercial uses are common and generally accepted in urban areas. An approximate doubling of traffic volumes in the area would be necessary to produce an increase in ambient noise levels noticeable to most people. The proposed project would not cause a doubling in traffic volumes and therefore would not cause a noticeable increase in the ambient noise level in the project vicinity.

Project construction would temporarily and intermittently increase noise and possibly vibration levels around the project site and may be considered an annoyance by occupants of nearby properties. Noise and vibration levels over the estimated 10-14 month construction period would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Construction noises associated with the proposed project would include excavation, truck traffic, and finishing. Of these, excavation, and site work would likely generate the most construction-related noise.

Throughout the construction period there would be truck traffic to and from the site, hauling away excavated materials and debris, or delivering building materials. It is anticipated that the construction hours would be working hours from 7AM to 5PM during the week, with possible limited work during weekends.

The San Francisco Noise Ordinance (Article 29 of the Police Code) regulates construction-related noise. Although not listed as a mitigation measure, it is required by law and would serve to mitigate significant negative impacts of the proposed project on sensitive receptors. The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA5 at a distance of 100 feet from the source. Impact tools, such as jackhammers, must have both the intake and exhaust muffled to the satisfaction of the Director of the Department of Public Works or the Director of Building Inspection. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection. The project must comply with regulations set forth in the Noise Ordinance.

Sensitive receptors are people requiring quiet, for sleep or concentration, such as residences, schools, or hospitals, and people themselves who may be relatively more susceptible to adverse health impacts from their environment, such as immune-compromised individuals, populations with elevated levels of chronic illness, children, and the aged. The nearest sensitive receptors to the project site would be nearby residents, including residents of the buildings immediately west of the project site along Russell Street, and north and south along Hyde Street. Construction activities other than pile driving typically generate noise levels no greater than 90 dBA (for instance, for excavation) at 50 feet from the activity, while other activities, such as concrete work, are much less noisy. Closed windows typically can reduce daytime interior noise levels to an acceptable level. Therefore, for nearby sensitive receptors, although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly

5 dBA is the symbol for decibels using the A-weighted scale. A decibel is a unit of measurement for sound loudness (amplitude). The A- weighted scale is a logarithmic scale that approximates the sensitivity of the human ear.

experienced in an urban environment, and would not be considered significant. The proposed building would not use pile driving. The proposed project would not create unusual levels of ground borne vibration that would disturb nearby residents or businesses, and vibration impacts would be less than significant. Given the above-mentioned City noise regulations and the temporary nature of construction work, construction noise would have a less-than-significant effect on the environment.

Air Quality: The California Air Resources Board (ARB) established its statewide comprehensive air toxics program in the early 1980s. The ARB created California's program in response to the Toxic Air Contaminant Identification and Control Act (AB 1807, Tanner 1983) to reduce exposure to air toxics. The ARB identifies 244 substances as toxic air contaminants (TACs) that are known or suspected to be emitted in California and have potential adverse health effects. Public health research consistently demonstrates that pollutant levels are significantly higher near freeways and busy roadways. Human health studies demonstrate that children living within 100 to 200 meters of freeways or busy roadways have poor lung function and more respiratory disease; both chronic and acute health effects may result from exposure to TACs. In 2005, The ARB issued guidance on preventing roadway related air quality conflicts, suggesting localities "avoid siting new sensitive land uses within 500 feet of a freeway [or other] urban roads with volumes of more than 100,000 vehicles/day."[6] However, there are no existing federal or state regulations to protect sensitive land uses from roadway air pollutants.

The San Francisco Department of Public Health (DPH) has issued guidance for the identification and assessment of potential air quality hazards and methods for assessing the associated health risks.[7] Consistent with ARB guidance, DPH has identified that a potential public health hazard for sensitive land uses exists when such uses are located within a 150-meter (approximately 500-foot) radius of any boundary of a project site that experiences 100,000 vehicles per day. To this end, San Francisco added Article 38 of the San Francisco Health Code, approved November 25, 2008, which requires that, for new residential projects of 10 or more units located in proximity to high-traffic roadways, as mapped by DPH, an Air Quality Assessment be prepared to determine whether residents would be exposed to potentially unhealthful levels of $PM_{2.5}$. Through air quality modeling, an assessment is conducted to determine if the annual average concentration of $PM_{2.5}$ from the roadway sources would exceed a concentration of 0.2 micrograms per cubic meter (annual average).[8] If this standard is exceeded, the project sponsor must

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6 California Air Resources Board, *2005 Air Quality and Land Use Handbook: A Community Health Perspective*, http://www.arb.ca.gov/ch/landuse.htm, accessed September 8, 2008.

7 San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 6, 2008, http://dphwww.sfdph.org/phes/publications/Mitigating_Roadway_AQLU_Conflicts.pdf, accessed September 8, 2009.

8 According to DPH, this threshold, or action level, of 0.2 micrograms per cubic meter represents about 8 – 10 percent of the range of ambient PM2.5 concentrations in San Francisco based on monitoring data, and is based on epidemiological research that indicates that such a concentration can result in an approximately 0.28 percent increase in non-injury mortality, or an increased mortality at a rate of approximately 20 "excess deaths" per year per one million population in San Francisco. "Excess deaths" (also referred to as premature mortality) refer to deaths that occur sooner than otherwise expected, absent the specific condition under evaluation; in this case, exposure to PM2.5. (San Francisco Department of Public Health, Occupational and Environmental Health Section, Program on Health, Equity, and Sustainability, "Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review, May 6, 2008. Twenty excess deaths per million based

install a filtered air supply system, with high-efficiency filters, designed to remove at least 80 percent of ambient $PM_{2.5}$ from habitable areas of residential units.

The project site, at 1945 Hyde Street is not located within the Potential Roadway Exposure Zone, as mapped by DPH. Thus, the proposed project is not expected to result in a significant impact from exposure of sensitive receptors to high concentrations of roadway-related pollutants.

Air Quality Impacts Related to Construction Dust. The San Francisco Building and Health Codes contain measures that reduce the quantity of dust generated during site preparation, demolition, and construction work to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI). These measures, generally referred as the Construction Dust Control Ordinance, require that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The proposed project would primarily occur on top of the existing pavement, except for the proposed car-stackers which would require limited excavation, and thus would be unlikely to result in dust-related air quality impacts.

Water Quality: The proposed project would not generate wastewater or result in discharges that would have the potential to degrade water quality or contaminate a public water supply. Project-related wastewater and storm water would flow to the City's combined sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge. Therefore, the proposed project would not result in significant water quality impacts.

e) The site can be adequately served by all required utilities and public services.

The project site is located in a dense urban area where all public services and facilities are available; no expansion of public services or utilities would be required.

Historic Architectural Resources

In evaluating whether the proposed project would be exempt from environmental review under the California Environmental Quality Act (CEQA), the Planning Department must first determine whether the building located at 1945 Hyde Street is a historical resource as defined by CEQA. As described in the Historic Resource Evaluation Response (HRER) memorandum dated July 8, 2010, 1945 Hyde Street appears to be eligible for listing in the California Register of Historical Resources as an individual resource under Criteria 3 (Architecture) and as a contributor to potential historic district.[9]

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on San Francisco's non-injury, non-homicide, non-suicide mortality rate of approximately 714 per 100,000. Although San Francisco's population is less than one million, the presentation of excess deaths is commonly given as a rate per million population.)

[9] Memorandum from Moses Corrette, Preservation Technical Specialist, to Chelsea Fordham, Environmental Planner, Major Environmental Analysis, July 8, 2010. This document is on file and is available for review as part of Case File No. 2010.0162E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA.

The building at 1945 Hyde Street is a 19,739 square-foot, two-story over basement parking garage containing 58 off-street parking spaces, which was constructed in 1920. The primary character defining features of the building at 1945 Hyde Street include its visible massing from Hyde Street, parapets, decorative brick detailing, and arched openings, large industrial sash windows, and overall spatial relationship to adjacent buildings and the surrounding neighborhood.

The building at 1945 Hyde Street embodies the distinctive characteristics of a type, a 1920 ramped parking garage with an architecturally embellished exterior. It was designed in the Mission Revival and Secessionist styles. Although not a classical design like the surrounding Classical Revival apartment buildings, the building still exhibits an order and symmetry intended to blend well with the existing buildings. After the 1920s, parking garage design moved away from the visually contextual design influence to a more functional and practical design that did not necessarily blend with its surroundings. Because it embodies the distinctive characteristics of its type, the building is eligible for listing in the California Register under Criterion 3 (Architecture). Additionally, the subject building retains a high degree of integrity with respect to location, association, design, workmanship, setting, materials, and feeling.[10] Therefore, the subject property is considered a historic resource under CEQA. Additionally, the building at 1945 Hyde Street may also contribute to a potential historic district of neighborhood-serving automobile parking garages built from the first half of the 20th century, if such a district was proposed. The garages would store private automobiles, and provide basic maintenance services. In the case of 1945 Hyde Street, the surrounding blocks of Russian Hill were served.

The building at 1945 Hyde Street also has an indirect association with Carolyn and Neal Cassady, their home across Russell Street, at number 29 is also associated with the Beat poet Jack Kerouac who lived with the couple in 1952. The project site at 1945 Hyde Street provided the backdrop of a well known photograph of the two men c. 1952 depicting the pair against the concrete wall, with the steel window in the basement as the sole identifying element of the building in the photo, which was later used as the cover photo for the book *On the Road* by Jack Kerouac. However, this indirect association does not qualify 1945 Hyde Street for listing on the California Register per Criterion 2 (Persons).

The Planning Department preservation staff assessed whether the proposed project, which would include conversion of the property from a parking garage to a mixed-use residential and commercial building with a third story addition, would result in a substantial adverse change to the historical resource. The proposed project at 1945 was assessed for its consistency with the Secretary of the Interior Standards for Rehabilitation (Standards) analysis.[11] Based upon this analysis, Planning Department staff finds that the project would not cause a substantial adverse change in the resource such that the significance of the building would be materially impaired for the following reasons.

- The proposed project would retain the physical structure, but not use, of the historic automobile garage at the site *(Secretary Standards 2, 5)*.

[10] Memorandum from Moses Corrette, July 8, 2010, Ibid.

[11] Kelley & VerPlanck Historic Resources Consulting, Historical Resource Evaluation 1945 Hyde Street San Francisco California, February 2010, p18

- The new use will require minimal changes to the building's distinctive materials, features, spaces, and spatial relationships. *(Secretary Standard 1).*
- The proposed new penthouse would be designed in a contemporary style that uses a simple vocabulary in order to create compatible design that is distinguishable as a new feature within the site. The penthouse would rise approximately seven feet above the parapet height on the Russell Street elevation; a roof terrace with 42" clear glass railing would be set back approximately 15 feet from the building wall, which would not be visible from Russell Street. *(Secretary Standards 3, 9)*
- The new floor could be removed entirely in the future without harming the historic integrity of the building. *(Secretary Standard 10).*
- The steel window at the basement level of the Russell Street elevation which can be seen in the c. 1952 photograph of Jack Kerouac and Neal Cassady will be retained and rehabilitated. *(Standards 4, 5, 6)*
- The remaining existing steel sash industrial windows will be replaced due to extensive deterioration and distortion of the steel sash. A condition survey of all existing windows has been conducted. It reveals overall heavy corrosion, deterioration, and distortion, as well as separation of the frames from the concrete openings. The project proposes to replace them with new windows that replicate the existing sash profile and glazing pattern. *(Secretary Standard 6).*

Therefore, based upon the project's consistency with the Secretary of the Interior Standards, and the fact that the project would not would result in a substantial adverse change to the historical resource, the impact was determined to be less-than-significant.

The proposed project would also not result in an impact to off-site historic resources. Russell Street to the south and west of the subject property is a potential historic district of small scale residential buildings built between 1906 and 1908, with two buildings from the 1910s that together could be eligible for listing on the California Register. Several buildings are listed on the 1976 Architectural Survey, and the Here Today survey, and are presumed to be historic resources. The proposed project is adjacent to the potential district within a building that is of a vastly different type, period, and method of construction, and could not be part of that architectural context. The building is of a larger scale than the adjacent Russell Street buildings, however, 1945 Hyde has been part of the fabric of the neighborhood for 90 years, as it has served as a community parking garage for several decades. The proposed alterations to the building would be minimally visible and, while an incremental change to the setting of Russell Street, the conversion and addition would not have a significant adverse effect on the integrity of the adjacent resources.

Hazards and Hazardous Materials

The City has adopted an ordinance (Ordinance 253-86, signed by the Mayor on June 27, 1986), which requires analyzing soil for hazardous wastes within specified areas, known as the Maher area, when over 50 cubic yards of soil are to be disturbed and on sites specifically designated by the Director of Public

Works.[12] The project site falls outside the boundary of the Maher Ordinance and, therefore, would not be subject to this ordinance.

A Phase I Environmental Site Assessment (ESA) and soil sampling and analysis were prepared for the project site.[13; 14] The Phase I ESA reviews and summarizes previous environmental documents prepared for other sites in close proximity to the project site, lists current and past operations, reviews environmental agency databases and records, reports site reconnaissance observations, and discusses potential contamination issues. The Phase 1 identified one recognized environmental conditions associated with the project site. Review of fire department records indicate a permit was issued on May 7, 1941 for the installation of one 550-gallon underground storage tank (UST) which was reportedly installed to replace one of two 285 –gallon UST's. A Notice of Application for a permit dated November 11, 1963 indicated that two UST's were to be removed from the subject property and replaced with two, 2,000 gallon gasoline UST's. Review of permits from the Department of Public Health (DPH) indicates that the two, 2,000-gallon gasoline UST's were removed from the project site on January 26, 1996. These previously removed UST's represent a historical recognized environmental condition. Therefore, soil sampling and analysis was conducted to determine if the UST's resulted in contamination of the soils on the project site. Analytical results of the sampling and analysis program indicate the soil to be excavated did not contain any petroleum hydrocarbon constituents at or above the method reporting limits and the metal concentrations were within background levels. Based on the analytical results of the soil samples analyzed, the soil is an unrestrictive waste and no special soil handling will be needed.[15]

The results of the soil sampling and analysis determined that that no further action is required for the site and any potential impacts associated with hazardous materials from the previous UST's would be less-than-significant. [16]

Building Asbestos. Due to the age of the existing structures, asbestos-containing materials may be found within the existing on-site structure proposed to be altered. Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable Federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both

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[12] The Maher Ordinance applies to that portion of the City bayward of the original high tide line, where past industrial uses and fill associated with the 1906 earthquake and bay reclamation often left hazardous waste residue in soils and groundwater. The ordinance requires that soils must be analyzed for hazardous wastes if more than 50 cubic yards of soil are to be disturbed.

[13] Property Solutions Inc. Phase I Environmental Site Assessment for Parking Garage 1945 Hyde Street and 22 Russell Street, San Francisco, California, March 5, 2009.

[14] Treadwell & Rollo, Soil Sampling and Analysis, 1945 Hyde Street, San Francisco, California, November 4, 2010.

[15] Treadwell & Rollo, November 4, 2010, Ibid

[16] City and County of San Francisco Department of Public Health, Division of Occupational and Environmental Health, letter to John Parker Willis, Green Garage LLC, November 12, 2010. This document is on file and available for public review by appointment at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, as part of the project file 2010.0162E.

inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or abatement work.

Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/altered including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The District randomly inspects asbestos removal operations. In addition, the BAAQMD will inspect any removal operation concerning which a complaint has been received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material is required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Pursuant to California law, the Department of Building Inspection (DBI) would not issue the required permit until the applicant has complied with the notice requirements described above.

These regulations and procedures, already established as a part of the permit review process, would ensure that any potential impacts due to asbestos would be reduced to a less-than-significant level.

Lead-Based Paint. Because of the age of the existing building it may contain lead-based interior or exterior paint. Demolition or alterations must comply with Chapter 34, Section 3407 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on any building built on or before December 31, 1978, or any steel structures to which lead-based paint disturbance or removal would occur, and exterior work would disturb more than 100 square feet or 100 linear feet of lead-based paint, Chapter 34 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Chapter 34 contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the Department of Housing and Urban Development (HUD) Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall make all reasonable efforts to prevent migration of work debris beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The ordinance also includes notification requirements, contents of notice, and requirements for signs. Notification includes notifying bidders for the work of any paint inspection reports verifying the presence or absence of lead-based paint in the regulated area of the proposed project. Prior to commencement of work, the responsible party must provide written notice to the Director of the Department of Building Inspection of the location of the proposed project; the nature and approximate square footage of the painted surface being disturbed and/or removed; anticipated job start and completion dates for the work; whether the responsible party has reason to know or presume that lead-based paint is present; whether the building is residential or nonresidential, owner-occupied or rental property, approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. (Further notice requirements include Sign When Containment is Required, Notice by Landlord, Required Notice to Tenants, Availability of Pamphlet related to protection from lead in the home, Notice by Contractor, Early Commencement of Work [by Owner, Requested by Tenant], and Notice of Lead-Contaminated Dust or Soil, if applicable.) The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

These regulations and procedures established by the San Francisco Building Code would ensure that potential impacts associated with lead-based paint disturbance during construction activities would be reduced to a level of insignificance.

Aesthetics and Community Character

Design and aesthetics are by definition subjective, and open to interpretation by decision-makers and members of the public. Under CEQA, a proposed project would be considered to have a significant adverse effect on visual quality only if it would cause a substantial and demonstrable negative change. The proposed project's specific building design and aesthetic would be considered during the City's Planning approval and design review process.

The proposed project would convert an existing parking garage into a mixed-use building with seven residential units and a ground-floor commercial space. Additionally, the project would construct a third floor addition that would increase the height from 32 to 40 feet; however, this increase in height and change of use would not substantially alter the existing character of the surrounding neighborhood, which is primarily two-to three-story multi-family residential buildings and mixed-use buildings with small-scale ground-floor commercial uses and residential above. While intensifying the use on the project site, the proposed project would not add a new or visually inconsistent presence to the area. The proposed building envelope meets planning code requirements for NC-1 zoning and 40-X height-bulk district.

The proposed project would be visible from within the neighborhood of the project site vicinity, particularly from the adjoining properties to the project site. The change in views would not exceed that commonly expected in an urban setting and would not be considered an environmental impact of the proposed project.

Additionally, the project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass at the pedestrian level. Mirrored glass would not be used in the building. The project's lighting is consistent with exterior lighting typical of other buildings in the project vicinity. For these reasons, the proposed project would not generate obtrusive light or glare that would substantially impact other properties. Light and glare would not be considered a significant impact of the project. For these reasons, the project would not have a significant impact on visual quality under CEQA.

Neighborhood Concerns

A "Notification of Project Receiving Environmental Review" was mailed on June 14, 2010 to owners and occupants of properties within 300 feet of the project site. The Department received several phone calls, emails, and letters in response to this notice. Respondents requested to receive further environmental review documents and/or expressed concerns regarding the proposed project. Concerns regarding the proposed project included: (1) the loss of short-term and long-term parking for residents and businesses within the vicinity of the project site; (2) hazardous materials impacts; (3) impacts to historic resources, including the project site and adjacent historic districts; (4) noise and air quality impacts from the loss of parking and increased cars circling and looking for parking; (5) noise impacts from construction; (6) compatibility with applicable plans and zoning; (7) land use impact; (8) aesthetics impacts; and (9) pedestrian impacts. These issues were addressed in the discussion presented above.

There were numerous non-CEQA related comments, some of which are addressed in other stages of project review such as consideration of project approvals or building permit review. They include the following: economic issues, such as the loss of affordable housing from the loss of a neighborhood parking facility, impacts to the economy from the loss of parking for surrounding commercial uses, and community controversy and opposition.

Conclusion

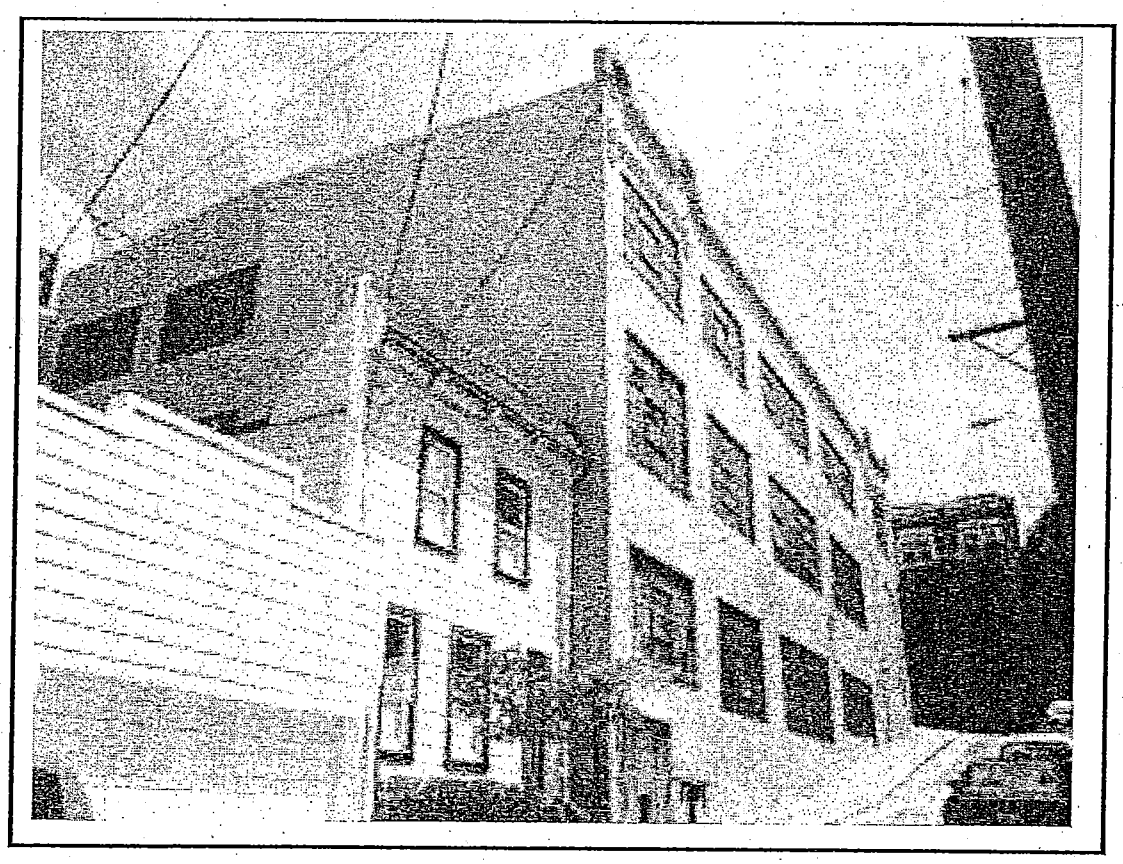
CEQA State Guidelines Section 15332, or Class 32, allows for an exemption of an in-fill development meeting various conditions. As described above, the proposed project is an in-fill development that would have no significant adverse environmental effects and would meet all the various conditions prescribed by Class 32. Accordingly, the proposed project is appropriately exempt from CEQA under Section 15332.

CEQA State Guidelines Section 15300.2 states that a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. There are no unusual circumstances surrounding the current proposal that would suggest a reasonable possibility of a significant effect. The proposed project would have no significant environmental effects and therefore, is appropriately exempt under Class 32 of the *CEQA Guidelines*.

Attachment C: Russian Hill Community Association (RCHA) Submittal to Planning Department "Response to Notice of Project Receiving Environmental Review," July 8, 2010

Response to
Notice of Project Receiving Environmental Review

The 1945 Hyde Street Project
(a.k.a. Valencia Parking Garage)
Russian Hill's Community Parking Facility
Case No. 2010.0162E



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July 8, 2010

Contents

1. Summary

Significant Impact--Requires Initial Study

The Russian Hill Community Association reviewed the proposal for 1945 Hyde Street to add a fourth story to the existing three story community parking structure and convert the 90-year-old actively used community parking garage to 7 condominiums and approximately 860 square feet of commercial street plus 15 private, off-street parking spaces for the sole use of the condominium residents.

Our study concludes that the proposed project would affect at least six primary areas of environmental evaluation contained in the City's Initial Study Checklist.

The proposed 1945 Hyde Street Adaptive Reuse Project would have a host of potentially significant environmental effects under CEQA that require assessment in an Initial Study, not a Categorical Exemption, and mitigation through project redesign in some cases.

Our study found the Historic Resource Evaluation's conclusion questionable that renovation under the Secretary of Interior's Standards would be sufficient mitigation. Renovation to such standards would mitigate most adverse effects related to the building's character-defining architectural and design features, particularly the Hyde Street façade, but such mitigation would not avoid the loss of the existing 90-year-old community parking land use from the conversion to high-end residential. **The historic land use itself is one of the building's historic characteristics, linking it to the surrounding historic residential uses and to an important period in the development of San Francisco, the 1920s-era parking garages and associated urban development**. Somehow, the HRE alludes to this connection, but then dismisses it, erroneously from our perspective.

As such, the proposed project would have a significant and unavoidable historical resource impact from the adaptive reuse conversion of its historic community parking use to high-end residential. Therefore an Environmental Impact Report is required, which in turn requires the exploration of environmentally sensitive alternative project proposals capable of substantially reducing or avoiding the significant and unavoidable historic resources impact.

The proposed project also merits additional environmental study from a historic point of view because of 1945 Hyde Street's role as one of a dwindling building type throughout the City—1920-era garages--and because the San Francisco Planning Department has yet to take action to protect this threatened historical resource citywide through the creation of a discontiguous 1920-Era Parking Garage Historic District. The absence of protection through such a district suggests the need for a precautionary approach to the demolition of any unprotected potential historic resource--and neighborhood parking land use asset--and that of the 1945 Hyde Street building in particular, in order to avoid a potentially significant cumulative historic resource impact.

Not only does the HRE allude to and lend support to such a potential district and to the 1945 Building's role in it, but one of the HRE's references develops the point in detail. In his study "Educate, Preserve, Reuse: The Good (Not Great) Garage Buildings of San Francisco" (the "Kessler Report," see Exhibit 1), Professor Mark Kessler of the University of California, Davis notes:

> "The gradual disappearance of these smaller-scale buildings is the consequence of the city's growth and modernization... Today, the most common reason for garages to be demolished is the development of the properties for residential use. The motivation is greater financial return. If the site is zoned for bigger bulk, full development of the property could reap substantial rewards.

The Kessler Report further notes:

> "When a garage is reduced to its façade, it ceases to exist as an example of the building type...A building may merit preservation not for its individual excellence, but for its continuity with other examples of the type. The distribution of garages throughout the city, in neighborhoods on opposite ends of the economic spectrum–like the Tenderloin and Russian Hill–is a fortuitous source of harmony..."

Lastly, the proposed project raises many project review and design issues that would need to be resolved satisfactorily before a project approval or disapproval decision could be made. Sometimes, the remaining issues after environmental review are fundamental land use conflicts, as in the case of the proposed project where an adaptive reuse to residential is being proposed for an existing viable, vital, and historical 90-year community parking land use and asset. Often, the project review and design issues remaining after environmental review and mitigation are of a finer grain nature than can be addressed in the environmental review. For instance, the persistence of upsetting periods of construction noise even after compliance with the City's Noise Ordinance, or the adverse urban design effects of adding more mass to an existing overly massive industrial structure set amidst a residential neighborhood with finer-grained lot patterns and buildings if the environmental analysis did not find adding any mass at all a significant, possibly unavoidable, aesthetic impact. As a result, even if an environmental impact would be considered reduced to a less-than-significant level in the environmental analysis, the residual impact may still be substantial and of concern to residents and planners in terms of urban design and livability. All of these issues are described in this response document.

In summary, the proposed project would have a significant and unavoidable historic resource impact and an EIR is required as a result. The additional issues are discussed in the document with supporting exhibits.

Historic Resource Evaluation:

- The 1945 Hyde Street Community Parking Garage building is individually eligible as an historic resource and would be a contributor to two potential historic districts because it's land use is intricately related to the surrounding residences and it is an exemplary representation of the 1920s-era parking garages.
- The 1945 Hyde Street Community Parking Garage building is not underutilized economically, and could be more intensely utilized for community parking if done properly.
- The project proposal includes adding a new fourth story to the existing three-story garage with access to all parking levels from Hyde Street.

- The 1945 Hyde Street Community Parking Garage building is associated with historically important people, namely Jack Kerouac and Neal Cassidy.
- The 1945 Hyde Street Community Parking Garage building's 90 years of service is honored in a Board of Supervisor Proclamation.

The Kessler Report:

- Provides the basis for creating a discontiguous 1920-Era Parking Garage Historic District and understanding why the 1945 Hyde Street Community Parking Garage building would be a contributor building to the potential Russell Street Reconstruction Period Historical District.

Environmental Review:

- **Project Description** – the proposed project would add a new fourth story to an existing three story community parking garage with access to all levels from Hyde Street.
- **Project Setting**—the small but burgeoning Hyde Street business district has found the hourly parking offered at the 1945 Hyde Street Community Parking Garage building a boost for business and a depressant when not available.
- **Compatibility with Existing Zoning:**
    - Even after proposed projects fit within the broad brush controls of the Planning Code, they require further refinement, often substantial, to adequately reflect the City's intention codified in its many applicable guiding policy and planning documents with their associated, objectives, policies, implementing programs, guidelines, and regulations.
    - Any project's height should be measured before framing to ensure that the height limit is not exceeded, as happens more frequently than it should.
    - Because the project has two principal facades, the driving polices for land use and aesthetic design requirements should apply to Russell Street as well as Hyde Street.
    - The range of urban design and livability impacts should be assessed for Russell Street, the mid-block alley street and one of San Francisco's neighborhood treasures.
- **Environmental Issues:**
    - ***Land use character and neighborhood impact*** on the quiet mid-block Russell Street and surrounding neighborhood.
    - ***Aesthetic view impacts*** from the full 360 degrees of project visibility
    - ***Aesthetic massing impact*** of adding any more mass on the existing excessively massive building, and associated issue of the significance criteria in this case (any addition would be significant?).
    - ***Aesthetic light and glare issues*** from residential uses behind large industrial windows facing Russell Street and the rooftop appurtenances, the glass stairway penthouse in particular.
    - ***Historic resource impact*** from changing the 90-year historic land use from community parking asset to high-end residential.
    - ***Transportation and Circulation***
        - The existing community parking garage meets, and has met, a long standing community need for parking, and the City's transit first policy does not include the wanton reduction of existing neighborhood parking assets.
        - The proposed parking ingress and egress onto Russell Street would create a dangerous circulation design feature.
        - Construction and staging would create dangerous congestion and hazards.

- Displacement of 60+ monthly parkers would increase on-street parking congestion, peak-hour traffic congestion while seeking parking, and may decrease the affordability of the existing housing stock as some of those monthly parkers install garages at their places of residence.
- Displacement of the short-term hourly evening parking would increase parking and traffic congestion during peak evening periods and reduce business.

- ***Construction Noise would remain after compliance*** with the City's Noise Ordinance, and this could be further reduced with a range of best practices that should be incorporated into the project as improvement measures. To do so however, requires more detailed analysis than is typically conducted in a routine Initial Study, but which is not exceptional in CEQA analysis.

Design and Project Review Issues:

- *Negative Project Neighborhood Impact/No Neighborhood or Citywide Benefits.*
  - Eliminating Historic Neighborhood Parking Asset for Unaffordable Housing.
  - Displaces 60+ Existing Off-street Parkers.
  - Increased Displaced-Parker Traffic Congestion.
  - Business impact from eliminating Short-term Off-street Parking Supply.
  - Accentuates Already-Excessive Bulk Impacts—should that be allowed as a neighborhood livability impact?
  - Construction Noise Assault on Neighborhood even with compliance with the City's Noise Ordinance.
  - Construction Traffic and Staging Nightmare.
  - Creating a 12/7/365, 100+ year, Light & Glare Spaceship.
  - Creation of a Parking-Related Traffic Hazard.
  - Added Retail Parking Demand Offsets Benefit of Sidewalk Activation.
- ***Hyde Street Off-street Parking In/Egress*** is clearly Superior.
- ***Massing/Design Issues*** from an adaptive reuse of an existing building that is already excessively massive.
- ***Minimal Russell Street Setback*** of Fourth Floor Residential Penthouse Addition would conflict substantially with the proposed Russell Street historic district and does not enhance Russell Street.

The proposed project would have substantial unavoidable impacts on this significant historic resource and requires an Initial Study and Environmental Impact Report to address the issues.

2. Project Site and Description

Adding a Fourth Floor to an already Massive Structure

The Valencia Parking Garage at 1945 Hyde Street was built in 1920 in response, as the Historical Resource Evaluation notes, to the parking needs of local residents. (HRE p. 9)

> "With the onset of widespread automobile ownership…parking became a critical issue in urban areas. It quickly became obvious that street parking could not accommodate the increasing volume of automobiles. Congestion was not relieved by residential garages, as most homes and apartment buildings did not have them."

The Valencia Parking Garage has continuously functioned as a parking garage for the community for the last 90-years. It is Russian Hill's community parking facility, serving residents, retail customers and tourists.

The three-story garage is accessed by ramps from Hyde Street to the first story which has 19 lined parking spaces, the 3rd story with 23 lined parking spaces and the second street-level story with 15 lined parking spaces which can accommodate 30+ hourly customer, visitor and tourist parkers. The structure has a capacity well in excess of 60 vehicles.

As the HRE states, "Early parking garage design followed established architectural language…In San Francisco many garages adopted historicist vocabularies…" The Valencia Garage is heroic. It is massive compared to the neighboring one and two story cottages on Russell Street. But it reflects the needs of the times "These new buildings were easily integrated into the urban fabric." (HRE p.9)

The proposed project for 1945 Hyde Street would add a fourth story to the existing three story parking structure and convert the 90-year-old actively used parking garage to 7 condominiums and approximately 860 square feet of commercial street plus 15 parking spaces for the sole use of the condominium residents. It would add an additional 7 feet in height to the Russell Street façade and leave a southwest corner of the building at approximately 57+ feet – towering over the post earthquake cottages which are 30 feet or less.

3. Categorical Exemption –
Inappropriate Environmental Review Document

The proposed project would affect many primary areas of environmental evaluation and could have a host of potentially significant environmental effects under CEQA that require an Initial Study and then either a Negative Declaration or an Environmental Impact Report. The proposed project would require an EIR rather than a Categorical Exemption under CEQA,

- **Because it would change to residential use a viable existing community parking land use, which is one of the building's historic characteristics that associates it with two important periods of history and two potential historic districts (1) Reconstruction Period Russell Street and (2) 1920s-Era Parking Garage, thereby making it eligible for listing in the California Register and a historic Resource Under CEQA.**

The proposed project would require at least an Initial Study and subsequent Negative Declaration, rather than a Categorical Exemption, because the proposed project would:

- **Have a significant, if not unavoidable historic resource impact from changing the historic land use;**
- **Have a significant, if not unavoidable cumulative historic resource impact related to being a contributory building to two different potential historic districts, and**
- **Cause a range of other potentially significant environmental effects under CEQA, including land use character, neighborhood, aesthetic views, aesthetic massing, aesthetic light and glare, transportation and circulation, and construction noise.**

The preface of Resolution No. 14952, "Categorical Exemptions from the California Environmental Quality Act," adopted by the San Francisco Planning Commission on August 17, 2000, notes:

> **"Where there is a reasonable possibility of a <u>significant</u> effect due to unusual circumstances surrounding the project, it is not exempt even if it clearly fits one of the categories.** (emphasis added)

The preface goes on to note:

> **"A categorical exemption shall also not be used for a project which may cause a substantial adverse change in the <u>significance</u> of a historical resource."** (emphasis added)

Therefore, the proposed project does not qualify for a Categorical Exemption.

4. Historical Resource Evaluation (HRE)

Deficient Examination of a Historical Resource

The Historic Research Evaluation of February, 2010, while adequate from a general historic perspective, is singularly deficient in addressing the specific project at 1945 Hyde. The Valencia Parking Garage appears to be individually eligible for the California Register as part of either the potential Russell Street Reconstruction Period Historic District or of a potential discontiguous 1920s-Era Parking Garage Historic District, or as a contributory building to either potential district. Curiously, this conclusion can be drawn from information in the HRE itself and one of its key references, the Kessler Report (Exhibit 1), but is not addressed in the HRE.

The HRE is also silent on one of the building's key historic characteristics, its 90-years of continuous use as a neighborhood parking facility. This key aspect of the building's historic nature will be lost forever with the proposed conversion to residential and retail uses.

The HRE also contains factual inaccuracies, draws unsupported conclusions, omits noteworthy people and events, ignores the potential Russell Street Historic District and its essential links to the parking garage at 1945 Hyde Street and avoids mentioning or addressing substantive comments by Professor Mark Kessler of the University of California, Davis in his report on San Francisco's garage buildings presented to the San Francisco Planning Department on December 11, 2008. These serious omissions require further assessment and systematic presentation in an Initial Study.

Deficiencies of the Historical Resource Evaluation are noted below by the HRE Chapter headings.

I. Summary –

1945 Hyde Street is a contributor to the potential Russell Street Historic District and environs contrary to the HRE findings (HRE p.2)

The parking garage came into existence as a result of the needs of the district's residents and because "most homes and apartment buildings did not have residential garages." (HRE p.9). As such, even though 1945 Hyde is not a residential use, it is a community land use extension of those residences, and therefore, is an integral historic component of those residential uses, and possibly individually eligible, if not at least a contributory building, to such a potential historic district.

"Early parking garage design followed established architectural language..." (HRE p.9) The parking garage at 1945 Hyde Street and others throughout the City are inextricably bound together with the neighborhoods they serve. They exist because of these neighborhoods. As the HRE states, "These new buildings [parking garages], were easily integrated into the existing neighborhood fabric." (HRE p.9). As such, the 1945 Hyde building is a component of and contributor to any historic residential district based on its long-standing land use relationship to the surrounding residences.

II. Introduction –

1945 Hyde Street was always a fully utilized parking garage contrary to the HRE findings (HRE p.2).

The first and third floors of the existing parking garage were fully occupied by 40+ monthly parkers. Current residents note that there was often a waiting list of two to three years. In 2007, at the time of the retirement of the long time owners the first and third floors of the garage were fully occupied by monthly parkers (the second floor was an automotive repair shop). It was only when the rates for monthly parking were more than doubled after the building was sold that monthly parking occupancy dropped off. Further, with the right pricing policy and parking technology, the garage could hold many more cars, providing an invaluable service for surrounding residences and higher intensity land use.

IV. Description A. Exterior –

1945 Hyde Street is a three story plus sub-basement structure contrary to the building description in the HRE (HRE p. 4) The proposed plans call for the addition of a fourth story with a mechanical penthouse.

V. Historic Context –

Business analysis of other parking garages indicates that even if the current monthly parking rates were reduced by 25%, the parking garage could be economically viable contrary to the statement in the HRE (HRE p.11).

VII. Evaluation of Historic Status & Associations with People –

The historically eligible district and Russell Street in particular have significant associations with historically important people contrary to the statement in the HRE (HRE p. 17-18).

One of the most famous beat photos of all time was taken on the south side of the 1945 Hyde Street parking garage. Neal and Carolyn Cassady rented a home at 29 Russell Street in the winter of 1950-51. Not only did Jack Kerouac visit them there, he memorialized the visit in his book "On the Road", written in a manic three week period in April 1951.

During that visit, and before Carolyn threw them out, she snapped a photo of her lovers, in the sun on the North side of the alley, against the parking garage. It is not visible in the cropped version, but they stand in front of the steel sash and glass window, down low, that admits light to the garage's lower level.

Just up the street, Earl Swensen returned from WWII and launched a national/ international ice cream store chain out of one corner. Marcel et Henri launched an international gourmet foods emporium

from the opposite corner. And from a little gabled house on Russell Street, Jack launched a cold war missile with his ultimate "buddy" story that shook America from its post War conservative funk.

In addition, the City and County of San Francisco issued a Proclamation on March 31, 2007 for the retiring owners of the Valencia Parking Garage noting "Valencia Auto Service has provided parking spaces in their garage for more than 40 automobiles over the years, thus relieving parking congestion in the neighborhood..." (Exhibit 4)

From 1920 to today, 1945 Hyde Street has been a linchpin for the area.

Defining the attributes which link the structure to its significance as an historic resource and to inclusion in two different historic districts solely in terms of design and building characteristics of "scale, materials, form, and building type" reduces an essential question of historical linkage to its lowest common denominator and ignores three other eligibility criteria of the California and Historical Registers.

IX. Context & Relationship –

The 1945 Hyde Street building is associated with and connected to both the evolution of the automobile and to the reconstruction period contrary to the statement in the HRE (HRE p. 20). To detach the structure from its primary use, which was the support of the neighborhood's parking needs, is disingenuous to say the least, and needs further evaluation.

X. Evaluation of Project Specific Impacts under CEQA –

The HRE's findings about the proposed project's impact under CEQA are dependent in large measure on the author's detaching the Valencia Parking Garage from its surroundings and ignoring the proposed project's impact on its surroundings.

The most striking example of this approach is the fact that the report (and the proposed project's plans) ***pays lip service to the fact that 1945 Hyde has TWO facades***: Hyde Street and Russell Street. The HRE does not address the impact on the narrow street with one and two story cottages of the proposed 57+ foot wall at the southwest corner of the proposed project. The same degree of study and respect should occur on the Russell Street side of the proposal that was addressed on the Hyde Street facade. It could be argued that the issues driving site line and setback studies conducted for the Hyde Street facade are even more accentuated for the Russell Street facade. Russell Street is one of San Francisco's urban resources, distinct in character to our City's unique urban fabric and cultural history

In summary, these issues need further assessment in the Initial Study and EIR. In particular, given the deficiencies in the Historic Resource Evaluation, the report's conclusion that renovation under the Secretary of Interior's Standards would be sufficient mitigation is questionable. Renovation to such standards would not avoid the loss of the existing 90-year-old community parking land use from the conversion to high-end residential land use. As such, the proposed project has a significant and

unavoidable historical resource impact. As such, an EIR would be required, which in turn would require the exploration of environmental alternatives project proposals capable of avoiding the significant and unavoidable historic resources impact.

5. The Kessler Report[1]

A Significant Potential Historical Parking Garage District

On December 11, 2008, Professor Mark Kessler and his class made a presentation to the San Francisco Planning Department on the historically important "Garage Buildings of San Francisco." Whether it was cause and effect or not, the San Francisco Planning Department initiated a study of Historic Garages but restricted the study to those garages in and around San Francisco's Auto Row.

In his study, Professor Kessler raises the issue of "Typology," noting that "A typological approach encompasses the simultaneous awareness of the continuities and discontinuities amongst the examples."

> "Regarded individually, these buildings would not be as special or noteworthy...When the buildings are reframed as a group, they assume an importance that transcends individual merit, becoming urban in scope....The notion of typology is incompatible with either the demolition of examples or their reduction to stage sets that are preserved only to maintain the continuity of the street...
>
> "The typological approach extends protections to anonymous buildings and works against their isolation. It substitutes relationship for attribution and/or architectural distinction as the source of value. A building may merit preservation not for its individual excellence, but for its continuity with other examples of the type. The distribution of garages throughout the city, in neighborhoods on opposite ends of the economic spectrum – like the Tenderloin and Russian Hill – is a fortuitous source of harmony that the typological approach recognizes and celebrates.
>
> We may glean valuable insights into the collection as a whole, and into our history and heritage, through the preservation of the entire collection—and other collections just like it. Yet older buildings are everyday threatened by bland new construction. If we "go with the flow" and abandon the past, we cede the high moral ground and encourage the process by which our cities lose authenticity and all look alike." (Kessler p.15-16)

The Valencia Parking Garage at 1945 Hyde street is included in the Kessler study in exhibit A-8 as an example of the "Gothic Type" of San Francisco garages.

In a June 30, 2010 email to the RHCA 1945 Project Team, **Professor Kessler notes "Yes, the garage at 1945 Hyde is a beauty."**

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[1] Mark Kessler is an Assistant Professor at the University of California, Davis, where he teaches studio classes in interior architecture. He is an architect and was a founding partner of the architectural firm FACE. In 2008, he was awarded a research grant from the American Institute of Architects. His article, "Educate, Preserve, Reuse: The Good (Not Great) Garage Buildings of San Francisco," appears in the AIA Report on University Research, Vol. 4 (Exhibit 1). Professor Kessler is presently working on a book about the historicist garage structures of San Francisco.

As part of the Environmental Review process it is essential that the Planning Department determine how it intends to address the historic nature of San Francisco's garages and consider the proposed project within this context of building type and original use.

In particular, the building's historic parking land use must be fully described and evaluated in relationship to its eligibility for listing in the California Register and being considered a historic resource under CEQA due to its association with important historic periods and people. Not only will the proposed residential project create a significant and unavoidable historic land use impact with the conversion to residential and retail uses, but it will rip out a 90-year historic land use that not only served many of the surrounding residences and businesses, but whose existence as a community parking asset influenced the design of many of those residences.

The conversion of land use and loss of this historic characteristic of the building will require an EIR and overriding considerations should the proposed project ultimately be approved.

6. Environmental Review

Potentially Significant Impacts

For ease of review, the comments on the Environmental Review follow the outline stipulated in the "Initial Study" checklist used by the Planning Department.

A. Project Description

The proposed project for 1945 Hyde Street would add a fourth story to the existing three story parking structure and convert the 90-year-old actively used parking garage to 7 condominiums and approximately 860 square feet of commercial street plus 15 parking spaces for the condominium residents. The plans indicate a rooftop open space, but do not describe the full set of its features, including the presence, height, design of safety fencing and other Planning-Code permitted features.

B. Project Setting

The proposed project is located on the west side of the Hyde Street cable car line, between Union and Green Streets at historic Russell Street. The area is residential with a burgeoning neighborhood business district that benefits from the hourly parking on 1945 Hyde Street's first floor.

C. Compatibility with Existing Zoning

Although the proposed project appears to fit within most zoning controls, aside from the exceptions requiring conditional use or variance (excessive parking places requested, limiting and splitting the required rear yard, possibly exceeding lot size), the fit is less obvious in terms of General Plan policy and other planning requirements and guidelines. As the San Francisco planning community knows, the Planning Code prescribes only a first-cut, broad envelope of permitted development. This development outline requires the Planning Department to further shape individual project proposals in line with all of the City's goals and values so that the projects work in their particular contexts to achieve the City's overall goal for its physical development: creating, maintaining, and enhancing good urban design and livability. Those collective goals and values, the City's spirit and intention, are articulated in the guiding objectives and policies of the General Plan, Sustainability Plan, various area plans, etc., that codify the City's values and intentions for the physical development of its private and public realm. Thus, the required assessment in the Initial Study of Compliance with Zoning and Plans will be a first step in identifying the full set of relevant City goals and policies required to further refine the 1945 Hyde project proposal. This information is also used by the project review team to refine the project proposal in support of an informed project approval decision.

Of primary concern in any zoning review is compliance with the 40-Foot Height limit in the Russian Hill District and Neighborhood Land Use Compatibility.

40-Foot Height Compliance. In 1961 the Fontana Towers, "2-17 story slabs of concrete" rising near Aquatic Park caused a public outrage followed by major battles over proposed construction projects. In 1972 a height limit of 40 feet was enacted on Russian Hill. The 40 foot height limit is sacrosanct on Russian Hill. Plans at each step of the proposed project and building permit approval process should be validated that this limitation is clearly respected and articulated, and will be achieved by following the plans. Any project should be measured before framing to ensure that the height limit is not exceeded,

Neighborhood Land Use Compatibility. How does the proposed project relate to the applicable set of guidelines from the Urban Design Element, the Residential Design Guidelines, and other plans, policies, and regulations? Which guidelines would be violated and which design solutions would be required to address them? What does the set of applicable guidelines say about the project proposal and required redesign to work on the site and in the neighborhood?

E. Evaluation of Environmental Effects

1) Land Use and Planning

The proposed project would have a substantial impact upon the existing character of the vicinity.

The proposed project jeopardizes the land use character and associated historic nature of Russell Street and the potential historic district surrounding it.

Russell Street is a quiet alley of small scale, post earthquake cottages. It is one of the areas the HRE describes as contributing "...to the quiet and occasionally quasi-rural atmosphere of Russian Hill." (HRE p. 6) The seventeen homes on Russell Street were built between 1906 and 1908. (Exhibit 2) The mass of the Valencia Parking Garage is substantial and additional height adds additional mass that has a substantive adverse effect on surrounding buildings

Given the downward slope of Russell Street, there is a disjunction between the one and two story cottages no higher than 30 feet on Russell Street and the 40 foot height allowed on Hyde Street, and the almost 60 feet which would be at the southwest corner of the proposed project on Russell Street. The garage is already out of scale to the small cottages which characterize Russell Street and are so valued in the HRE. By adding a fourth floor and carrying it to the roof edge without a setback, this proposed project only exacerbates this discontinuity of scale. This is worthy of note because Russell Street retains a large proportion of post earthquake construction and would qualify as a historic district for the California Register of Historical Resources.

Although the Planning Code generically allows a change of land use within the NC-1 districts, does the City need an adaptive reuse project on the proposed project site and in the Russian Hill neighborhood that changes a 90-year-old, viable, high-demand, existing community parking land use into seven high-end residential condominiums? Does the City need to increase the mass of an already excessively massive building? Would that be the highest and best value for the city for land use at that site? Would that change be consistent with a myriad of other values, objectives, policies, guidelines, and regulations for land use

at that site and for citywide community benefit? Would the proposed adaptive reuse increase or decrease the quality of urban design and livability of the Union/Hyde Neighborhood? Beyond this key value issue with which the Planning Commission must wrestle, there are a range of other project design, review, and approval issues that would require project redesign or resolution otherwise.

2) Aesthetics

The proposed project would substantially degrade the existing visual quality of the site and its surroundings.

Visual/View Impact. The aesthetic visual effect on the surrounding neighborhood, including view blockage of the proposed fourth floor and the penthouse staircase, is hard to grasp. Existing elevations in the plan set portray unrealistic views from Russell Street and omit views from other important vantage points. The fourth floor addition, including modeling of the proposed rooftop appurtenances, requires comprehensive assessment from all key public and private vantage points before a determination of environmental impact can be adequately made. In any case, this information would be necessary independently for an adequate project review and an informed decision over project approval.

Massing/Design Issues. One tricky design issue for this project is the combination of the permitted 40-foot height on the downward slope to the west, and the large over-sized lot. The combination creates an excessively massive existing building. Such a structure would otherwise not exist if development had occurred on normal-sized lots, which would have resulted in a gradual stepping up of building height, with rooflines reflecting the topography. Instead, we have a massive existing structure that creates an excessive cliff-like transition to the normal-sized lots on Russell Street in direct violation of all design principles discussed in the City's Urban Design Element, the Residential Design Guidelines, and other design-related City codifications.

Impact on Russell Street. The project proposes to add about 7 feet of height and associated mass to an already excessively bulky structure, thereby exacerbating the urban design massing and building transition issues on Russell Street—one of San Francisco quaint mid-alley-street urban design treasures and neighborhood. The environmental issue is whether adding any mass at all, e.g., the fourth floor residential penthouse addition, would be a significant aesthetic impact under CEQA, or, significant or not, would require some redress under the City's applicable goals, objectives, policies, guidelines, and codes?

The impact of the vertical wall of frosted glass on the south (Russell Street) side of the mechanical penthouse/stairwell is unknown.

Impact on Union Street. The inordinately large staircase penthouse adds a monolith to the south side of Union Street rising over 50 feet and dominating the view from the north side of Union Street.

Light & Glare Impact. The proposed project, with its residential occupancy, the large windows of existing floors fronting Russell and Hyde Streets, the new fourth floor residences, and the mechanical penthouse/ staircase rooftop addition, create the potential for significant nighttime light and glare impacts. Such impacts are listed in the City's Initial Study Checklist Topic Item 2.d: "Would the project: ... Create

a new source of substantial light or glare, which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?" As such, the proposed project's light and glare impacts require assessment in the Initial Study. The Project Sponsor should provide examples in San Francisco where a comparable design exists so that impact can be evaluated. Left unassessed, the imagination goes to the newly renovated building appearing as an all-pervasive glowing alien spacecraft invading the neighborhood 24/7/365 for the next 100+ years before the next building renovation project would occur at the site.

3) Housing

The proposed project will adversely affect the affordability of housing on Russian Hill.

For almost a century, the Valencia Parking Garage provided from 40 to 60 off-street parking spaces for the automobiles on Russian Hill. The existence of this Russian Hill community parking facility alleviated the pressure for persons to construct garage additions to the existing houses and buildings on Russian Hill. Consequently the existence of the Valencia Parking Garage forestalled the construction of garage facilities in the existing housing structures on Russian Hill. When a garage is constructed in an existing housing structure on Russian Hill, this inflates the market value of that structure by $100,000+/- for each off-street parking space added to the housing structure. Thus, the existence of the Valencia Parking Garage over the past century contributed to maintaining the existing affordability of housing on Russian Hill.

The loss of approximately 60 parking spaces in this community parking facility over time will adversely impact the affordability of housing on Russian Hill.

5) Transportation and Circulation

Transportation, Traffic and Parking issues of concern are identified

Parking Garage meets a neighborhood need. The parking garage at 1945 Hyde Street was built at a time when automobile ownership was growing and parking became a critical issue because street parking could not accommodate the volume of automobiles and most homes and apartment buildings did not have garages. This same situation occurs today. There is a need to address if not accommodate the need for parking facilities.

The City has accommodated that need with public parking at Bush and Polk and with two facilities in the Cow Hollow area, among others. These new facilities have gained a negative aesthetic reputation, despite landscaping and vines crawling up the sides.

Valencia Parking Garage is Russian Hill's de facto community parking facility. The parking garage at 1945 Hyde Street has the capacity to continue to meet the needs of 40+ monthly parkers (possibly more with modern stacker-technology) and 30 to 40 hourly parkers.

Parking Ingress-Egress would be a Dangerous Circulation Design Feature. The parking access off Russell Street is not simply an issue of ingress-egress geometry, but of traffic loading onto Russell Street, with an increase in cars circling the mid-block streets to access the garage. Ingress-Egress directly onto Hyde Street would be preferable to the use of two streets, and would reduce the long-standing existing arrangement to one of the existing three driveways. The proposed parking egress and ingress onto Russell Street at the intersection of Hyde will create a traffic hazard as cars trying to enter Russell Street meet cars trying to exit the garage, or even enter the garage simultaneously. The new off-street parker-residents will interfere with the high volume of two-way, often speeding, through traffic on narrow, two-lane Hyde Street, including the frequent passage of the Hyde Street cable cars and illegal parking on Hyde Street in the Cable Car right of way or in the middle of Russell Street at Hyde while patrons drop off and pick up their dogs from the dog grooming business. The interference will create dangerous traffic conditions for automobiles and pedestrians alike. The potential traffic increase on the mid-block Russell Street will be out of scale to a mid-block street's transportation function as codified in the General Plan; thereby creating traffic safety issues for neighbors and families as they use the street for recreation, socializing, and other aspects of the public open space asset that such streets have in a large, livable City like San Francisco and as identified and protected in the General Plan.

Construction Traffic and Staging Congestion and Hazards. Increased construction truck trip traffic related to the large-scale renovation of a building already out-of-scale for the neighborhood would increase congestion and hazards on Hyde, Union, and Russell streets beyond levels of more construction projects on more typically-sized buildings in the neighborhood, and even those appropriate-scaled levels of construction impacts are unacceptable. Construction worker parking would exacerbate the already difficult daytime parking situation for neighbors on Russell and surrounding streets. Materials and supply staging, supplying, etc., would also create unacceptable congestion, noise, and disruption of neighborhood living.

Displaces 60+ Existing Off-street Parkers. The project would displace 60+/- existing off-street neighborhood parkers (and there is capacity for more), thereby reducing the supply of off-street parking and increasing competition for on street parking.

Increased Displaced-Parker Traffic Congestion. The displaced neighborhood parkers will increase traffic congestion and associated hazards and safety issues during peak hours as they circle the neighborhood looking for parking.

Elimination of Short-term Off-street Parking Supply. The 1945 Street parking facility began providing short-term parking during the afternoon and evenings two years ago, which has been a boon to neighbors entertaining their friends and to patrons of the local businesses and restaurants.

6) *Noise*

The proposed project would cause temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Construction Noise, Materials Management, and Problem-Solving Plan. The demolition, excavation, interior construction, and addition of the fourth floor in such a massive structure relative to the neighborhood presents a special set of substantial construction noise, materials, and logistics issues. What specific construction noise sources would potentially exceed the SF Noise Ordinance? Even if the ordinance would not be exceeded, what sources would be an exceptional and unwanted disturbance to adjacent residents, how frequently, and over what time period? What special measures would the project sponsor take to reduce peak construction noise to no more than 45 dba at the adjacent Russell, Union, and Hyde Street property lines? What level of noise attenuation will be achieved? Will there be a construction complaint phone line set up with DBI to facilitate fast problem solving should problems arise?

After all, surrounding buildings are mostly 50-100 years old and do not possess modern wall or window insulation. As a result, they provide little attenuation of air borne noise flowing into residential interiors (in direct contrast to a key assumption of the City's Noise Element), and they should not bear the burden of mitigation for an adjacent construction noise impact, nor suffer the pain of that construction noise; particularly when there is a range of best practices construction methods, beyond those recommended in the SF Noise Ordinance, for on-site noise attenuation. These issues, their regulatory requirements, and any special exceedances, significant impacts, or unacceptable nuisances require assessment in the Initial Study and identification of required mitigation measures, monitoring procedures, problem-solving procedures, and improvement measures.

19) Mandatory findings of Significance

This project needs to be considered within the context of the City's strategic plan for the historic garages of San Francisco. Once lost, it cannot be recaptured.

7. Non-Environmental
Project Design, Review, and Approval Issues

Beyond the environmental issues requiring assessment and mitigation through CEQA, the proposed project raises a set of project design, review, and approval issues. Although the Planning Code generically allows a change of land use within the NC-1 districts, does the City need an adaptive reuse project on the proposed project site and in the Russian Hill neighborhood that changes a viable, high-demand, existing community parking land use that has been in operation for 90-years into seven high-end condominiums? Is that the highest and best value for the city at that site. Is that change consistent with a myriad of other values, objectives, policies, guidelines, and regulations for land use at that site and for citywide community benefit? Would that increase or decrease the quality of urban design and livability of the Union/Hyde Neighborhood? Beyond the key values issue with which the Planning Commission must wrestle, there are a range of other project design, review, and approval issues.

1. **Negative Project Impact/No Benefits.** One problem with the proposed project is its extensive set of neighborhood and citywide impacts without any offsetting benefits.
    a. ***Eliminating Historic Neighborhood Parking Asset for Unaffordable Housing.*** The project changes a 90-year-old (historic) neighborhood parking land use asset into seven units of unaffordable housing with more than the permitted one private, off-street parking space per unit in a city that needs neighborhood parking and affordable housing, and that champions transit first.
    b. ***Displaces 60+ Existing Off-street Parkers.*** The project displaces 60 existing off-street neighborhood parkers (and there is capacity for more), thereby reducing the supply of off-street parking and increasing competition for on street parking.
    c. ***Increased Displaced-Parker Traffic Congestion.*** The displaced neighborhood parkers increase traffic congestion during peak hours as they circle the neighborhood looking for parking.
    d. ***Increase Unaffordable Housing,*** both in the new units, and in existing residences when residents add parking garages as replacement parking.
    e. ***Elimination of Short-term Off-street Parking Supply.*** The 1945 Street parking facility began providing short-term parking during the evenings two years ago, which has been a boon to neighbors entertaining their friends and to patrons of the local businesses and restaurants.
    f. ***Accentuates Already-Excessive Bulk Impacts.*** The project adds height and mass with an entirely new fourth floor to a building that is already excessively massive and too tall for the neighborhood context in general, and to the quaint mid-block Russell Street in particular. The existing cliff-like transition from 1945 Hyde to Russell Street is already a violation of urban design.
    g. ***Construction Noise Assault on Neighborhood.*** The project would add a couple years of ungodly construction noise in the renovation of an out-of-scale industrial structure in the midst of a 100-year old neighborhood whose dwellings mostly do not have the front-wall insulation or glazing to attenuate such noise adequately. Unfortunately, the standard

environmental mitigation measure, compliance with the city's Noise Ordinance, typically will not attenuate noise sufficiently to meet the City's land use noise policies in the Environmental Protection Element of the General Plan.

h. ***Construction Traffic and Staging Nightmare.*** Increased construction truck trip traffic related to the large-scale renovation of an out-of-scale building for the neighborhood increase congestion and hazards on Hyde, Union, and Russell streets beyond levels of more construction projects on the smaller, more typically-scaled buildings in the neighborhood, and even those impacts from construction on the appropriate-scaled buildings are unacceptable. Construction worker parking would invade the already difficult daytime parking conditions for neighbors on Russell and surrounding streets. Materials and supply staging, supplying, etc., would also create unacceptable congestion, noise, and disruption of neighborhood living.

i. ***Creating a 12/7/365, 100+ year, Light & Glare Spaceship.*** The light and glare emanating from the glass walls of the new fourth floor, from the other floors' residential uses with their large industrial windows facing Russell Street, and the rooftop, would create the irritating spectacle of an alien space ship invading the neighborhood each night, 365 days of the year for the next 100+ years of this new land use, even with compliance with the City's lighting ordinance.

j. ***Creation of a Parking-Related Traffic Hazard.*** The proposed parking egress and ingress onto Russell Street at the intersection of Hyde will create a traffic hazard as cars trying to enter Russell Street meet cars trying to exit the garage, or even enter the garage simultaneously. The new off-street parker-residents will interfere with the high volume of two-way, often speeding, through traffic on narrow, two-lane Hyde Street, including the frequent passage of the Hyde Street cable cars and illegal parking on Hyde Street in the Cable Car right-of-way and in the middle of Russell Street at Hyde while patrons drop off and pick up their dogs from the dog grooming business. The potentially increased traffic on the mid-block Russell Street will be out of scale to a mid-block street's transportation function as codified in the General Plan. As a result, the project would create a traffic safety issue for neighbors and families as they use the Russell Street for recreation, socializing, and other aspects of the public open space asset that such streets have in a large, livable City like San Francisco and as identified and protected in the General Plan. Similarly, traffic dangers and safety issues would be created on Hyde Street.

k. ***Added Retail Parking Demand Offsets Benefit of Sidewalk Activation.*** The commercial benefit of activating the 30 or so feet of existing sidewalk length presently taken up with the existing garages entrances and exits would be more than offset by the increased congestion caused by adding parking demand related to the retail uses, only some of which would be met by the three off-street parking spaces provided by the proposed project. The rest of the demand would need to be met with the project-reduced on-street parking supply. In addition, the proposed off-street parking egress/ingress would not eliminate interference with pedestrian traffic along the newly activated sidewalk, as that pedestrian traffic crosses Russell Street at the very point of ingress/egress into the proposed parking garage.

2. **Hyde Street Off-street Parking In/Egress is clearly Superior.** The clear preference of the Neighbors is for the entrance to the parking, if there is to be any off-street parking, to be on Hyde Street at the southeastern corner of the building. Such a location would eliminate the extra traffic on Russell Street, the interference, and congestion with existing traffic on Russell Street, would still activate a majority of (about 80 percent) of the existing building frontage, substantially

reduce, or eliminate interference with traffic on Hyde Street. Overall, the Hyde Street ingress-egress for the proposed off-street parking is a superior option.

3. **Massing/Design Issues.** Please see the discussion above, of the same topic, and under the Historic Resources topic in the section above on "Environmental Impact Review Issues for the Initial Study." The massing and design issues are articulated in many of the City's Urban Design Element General Plan objectives and policies, Residential Design Guidelines, and other codifications of the City's values and goals for physical development. One of the Planning Department's responsibilities is to develop further project proposals from the gross fit with zoning requirements and developers' maximized real estate value proposals to the finer articulation required for a project to "work" in its particular site conditions and neighborhood context. This further development is required so that the proposed project would make the maximum contribution to the livability, design, and urban functionality of the City's physical development. The direction for such refinement is contained in the City's many planning and design-related objectives, policies, and guidelines.

4. **Russell Street Setback of Fourth Floor Residential Penthouse Addition.** The proposed fourth floor conflicts substantially with the proposed Russell Street Historic District. Adding an additional seven feet of height to the south façade of 1945 does not enhance the street.

All of these design issues and concerns of the neighborhood require further project conditions and/or redesign in order for the proposed project to reflect the set of the city's objectives and values for good neighborhood urban design and livability.

8. Exhibits

Exhibit 1: Mark Kessler, "Educate, Preserve, Reuse: The Good (Not Great) Garage Buildings of San Francisco"

Exhibit 2: Historic Russell Street – Assessment Cluster – Sitex Data Corp

Exhibit 3: Significant People: – Cassady & Kerouac

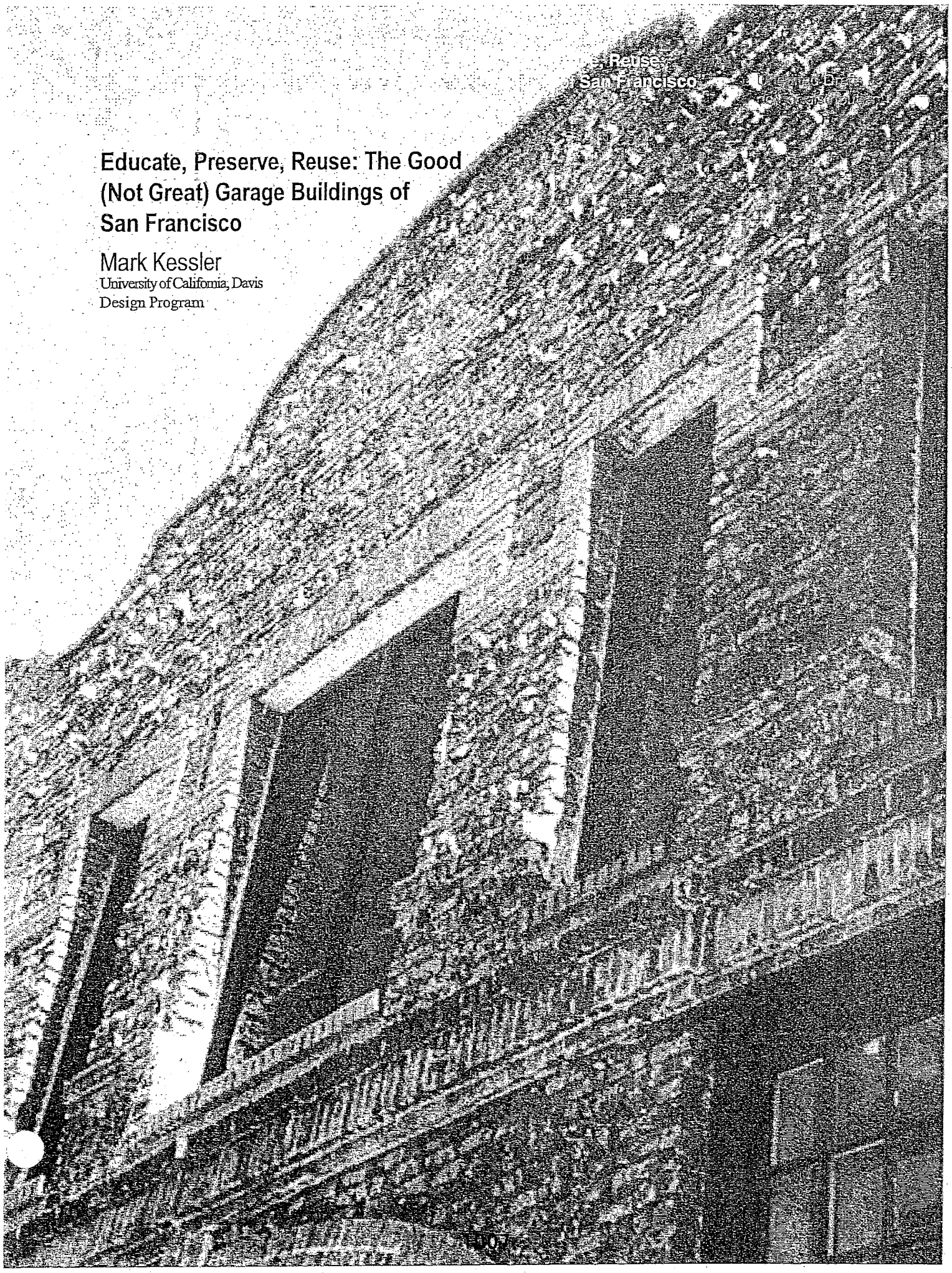
Exhibit 4: Significant Event -- City and County of San Francisco – Proclamation for Valencia Parking Garage, March 31, 2007

Exhibit 5: Significant Neighborhood Impact – Russell, Union and Hyde Streets

Exhibit 6: Historical Significance

Educate, Preserve, Reuse: The Good (Not Great) Garage Buildings of San Francisco

Mark Kessler
University of California, Davis
Design Program



Preface

This paper examines parking and repair garages built on the streets of San Francisco between the Great Earthquake and the Great Depression. It also documents a related study undertaken by students in my undergraduate studio class at UC Davis, who were assigned particular buildings to research, document and analyze. The study includes demolished and existing garages, as well as buildings adapted to new uses. Towards the end of the quarter, students developed original adaptive reuse designs for buildings they had researched. A sampling of the study, along with three reuse designs, is compiled as an Appendix at the end of this paper.

On December 11, 2008, the students made a presentation to the San Francisco Planning Department (SFPD). Taking the research outside the classroom and participating in the civic arena was a central pedagogical goal. Hopefully, the experience will encourage the students to become politically engaged as design professionals.

This study is not comprehensive in scope, as there are too many buildings for twenty-five students to cover in a ten-week studio course. However, the Appendix does constitute a representative sampling of the building type, and the scope is fleshed out by photographs included in the body of this paper. *Note: numbered references to figures in the Appendix are preceded by the letter "A."*

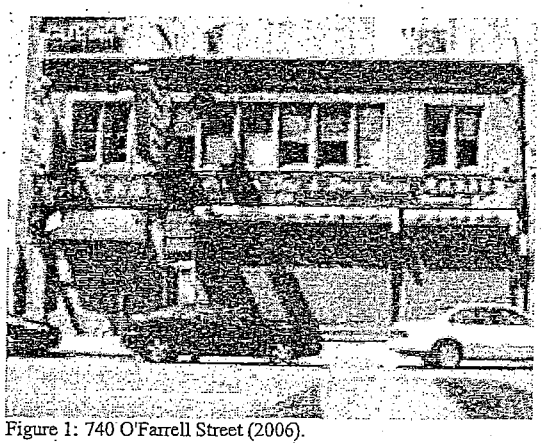


Figure 1: 740 O'Farrell Street (2006).

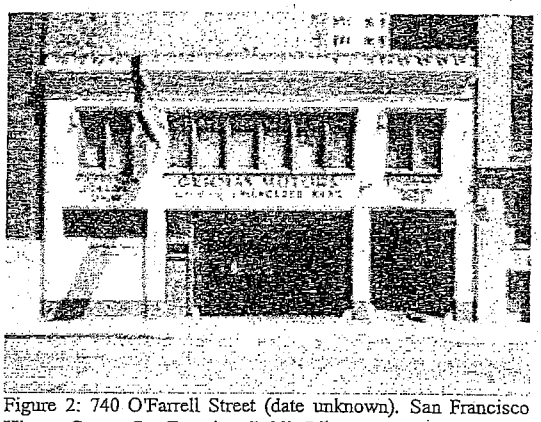


Figure 2: 740 O'Farrell Street (date unknown). San Francisco History Center, San Francisco Public Library.

Urban Context

Sight unseen, many would assume garages to be amongst the least deserving of attention, study and preservation. While the buildings are presented in a manner that suggests an *homage* to an overlooked aspect of architectural history, the goal is not a revision of the historical record. The garages are employed as a foil to argue in favor of increasing the scope and nature of our commitment to architectural preservation. So, while this work is undertaken with genuine affection for these particular buildings, it also exemplifies an approach that has more general application. The same arguments apply to the entire gamut of low-brow historicist structures located on city streets, including banks, theaters, utility buildings, train stations, piers and warehouses. Ultimately, the goal is to preserve the unique character, scale and diversity of our cities.

Why are these buildings worthy of consideration? They possess character by virtue of age, scale, use, structure, material, composition, style, and ornament. The façade often exerts a monumental presence, interrupting the flow of continuous building fronts that define the street (Fig. A5). These are extraordinary buildings in ordinary contexts.

The facades--white-collar compositions for a blue-collar use--are semiotically rich and allusive. Most are symmetrical and employ classically-derived elements to emphasize the center. Oftentimes presenting a portal to the street, the facades recall triumphal arches, train stations, and the pier buildings along San Francisco's Embarcadero. Based upon Renaissance, Baroque, Gothic, and Mission-style precedents, these facades exemplify the inventive mix of styles that is typical of academic eclecticism (Fig. A7).[1]

The garages are the improbable heirs to several grand architectural traditions. The same Beaux-Arts architectural principles and City Beautiful ambitions that guided the design of the city's larger civic buildings and transportation hubs are applied to these smaller buildings. The designers of this new building type looked to older, local precedents for inspiration. Moreover, both the garage and these local precedents share a common heritage in 19th-century structures that fuse the neo-classical compositions of the architect with the structural feats of the engineer.

Present Situation

The garages are old, industrial and retail, and, not surprisingly--they are vulnerable. Despite the odds, most have not fallen into disuse and continue to contribute to the economic and street life of the city. Convenient to locals and flexible in layout, these buildings continue to facilitate small auto repair and parking businesses, eighty to ninety years after construction. This is remarkable, considering the technological advancement in automobile design over this span, and the change in

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the garage business from one based on repair to one of maintenance and upkeep.

Roughly half of the 300 garages listed in the 1928 city directory still stand.[2] The majority of those are still used for parking or repair. However, most have undergone modifications that have altered their outward appearance for the worse, including the stripping of ornament, removal of parapets, widening of garage doors, and the addition of standard doors. Modern fabric awnings that obscure composition and ornamentation are ubiquitous in the Tenderloin (Fig. A9: 460 Eddy). A building's neglect hastens its demise, as its present condition, and not its original design, is the basis for assessment by government agencies. Who would guess, for example, that the shabby garage at 740 O'Farrell once looked as stately as it did (Figs. 1-2)?

Since garages are less monumental and far more numerous, demolishing one does not provoke the same level of concern or scrutiny that would a proposal to raze a major transportation hub, like San Francisco's Ferry Building. However, as a group of buildings that are part of the transportation and cultural history of the city, they should not be taken for granted.

The gradual disappearance of these smaller-scale buildings is the consequence of the city's growth and modernization. Judging from the consistently good-to-excellent quality of the demolished garages for which there are photographs, it appears that many additional fine examples have been lost. The garages at 240 Pacific, 410 Stockton, 375 O'Farrell and 1737 Jackson, would be amongst the finest examples of the type--if they still stood (Fig. A10). It's important to consider the impact of their absence when assessing the need for increased protection for those that remain.

While structures of historic note, like the Ferry Building, may be saved to exploit the marketing potential of the old architecture and appease the preservationist community, common buildings of lesser merit don't fare as well. Those who value such structures are on the defensive: the structures are not landmarks, they may be dilapidated, and if so, they can contribute to the visual malaise of a neighborhood in decline. This is the argument advanced by the San Francisco Redevelopment Agency for the Transbay Terminal, a project that will necessitate the demolition of several older structures. Consider the first stated objective of the project:

> Eliminating blighting influences and correcting environmental deficiencies in the Project Area, including, but not limited to, abnormally high vacancies, deficient and unsafe buildings, incompatible land uses, poor economic performance of retail businesses, underutilized and vacant land, high crime rates, and inadequate or deteriorated public improvements, facilities and utilities.[3]

In addition to demolition that results from the larger patterns of city development, many garages and industrial buildings are lost due to a single property owner's decision to develop a particular piece of real estate. In this case, a small infill building is replaced with a larger one. Today, the most common reason for garages to be demolished is the development of the properties for residential use. The motivation is greater financial return. If the site is zoned for bigger bulk, full development of the property could reap substantial rewards.

Building owners have an understandable interest in maximizing the potential of their properties. One landlord and mechanic told me that if he did not own his own buildings, his auto repair business would not survive. "The rents are very high and the profit margins are very low." He owns one garage building in a very desirable neighborhood and plans to develop three houses on the property "if the city lets me." While he freely acknowledges the "distinctive look" of these buildings, and takes pride in ownership, he believes they will not endure, and that he should not be asked to make a personal financial sacrifice by preserving the examples that he owns.

To many, the suggestion of holding up the growth of a city to preserve a collection of antiquated garages--even architecturally and historically significant ones--is absurd. However, the environmental crisis and the developing response in the design and building communities introduces a dynamic new factor into the opposition of preservation and development: sustainability.

There is a new notion of progress--one ironically predicated on the acceptance of a finite set of resources--that is a viable alternative to the traditional marriage of progress and growth. These buildings are indeed an existing resource, and their preservation would likely limit the economic return on their properties.

In order to fully appreciate the impact of sustainability on historic preservation (i.e., beyond the salvaging of building material), it is helpful to reference a global definition of sustainability, one not rooted exclusively in "green design." Dr. Vandana Shiva, physicist and environmental activist, defines sustainability simply as "the sustenance of the public good and the common good."[4] She regards natural resources as a collective asset--a "commons"-- to which all have access in order to sustain livelihoods.[5] While Dr. Shiva writes about the preservation of the biodiversity that is a foundation of traditional Indian farming, her approach is relevant to the architecture of American cities.

The city can also be regarded as a commons that nourishes and sustains. Its physical dimension includes streets and built form specific to its culture and history. Its building stock is a man-made version of a natural resource, offering a rich diversity of types, scales, materials and ages. This diversity is irreplaceable, because the buildings were built over time, and the conditions that gave rise to them will not repeat.

Jane Jacobs said that a mingling of "buildings that vary in age and condition"[6] is one of the essential pre-conditions to the generation of an "exuberant diversity in a city's streets and districts."[7] She goes on:

> Cities need old buildings so badly it is probably impossible for vigorous streets and districts to grow without them. By old buildings I mean not museum-piece old buildings, not old buildings in an excellent and expensive state of rehabilitation--although these make fine ingredients--but also a good lot of plain, ordinary, low-value old buildings, including some rundown old buildings.[8]

The call for architectural diversity has an economic basis. Jacobs explains that so many of the businesses that contribute to the vitality of the city, like "neighborhood bars, foreign restaurants and pawn shops,"[9] can't afford the higher rents associated with new construction. Cultural, economic and architectural diversity are mutually dependent and inseparable properties of a vibrant, sustaining city.

In other conflicts that arise between huge financial interests and vulnerable resources, we do require sacrifice, accommodation and coexistence. For example, the logging industry in northern California has been impacted by the mandate to save the spotted owl. The fishing industry has endured financial sacrifice--the cancellation of the season--to give salmon a chance to rebound in the ocean waters off the coast of Oregon and California. These examples demonstrate government's power to halt overdevelopment in order to protect an irreversible loss, the extinction of a species.

We can embrace an approach to architecture that is comparable to recycling and the salvation of threatened species. A preservation movement influenced by sustainability assumes a broader mandate that includes both the conservation of materials and the preservation of architectural diversity. We can consider, for example, imparting "endangered species" status to building types. The goal is not to stop growth, but to achieve a greater balance between the interests of development and the general good of the inhabitants of the city.

The principles of sustainability and typology encompass a holistic view that inspires greater respect for existing structures and their interrelationships. Both architectural typologies and biological morphologies create classifications that heighten our awareness of the diversity of our surroundings. If we do not classify, we generalize, and we stand to lose that diversity and an irreplaceable inheritance through *laissez-faire* indifference. We can say that there are other owls and other industrial buildings, or more precisely, decide that these distinctions do not deserve our attention. This negligence fosters vulnerability because it enables the developer to isolate the

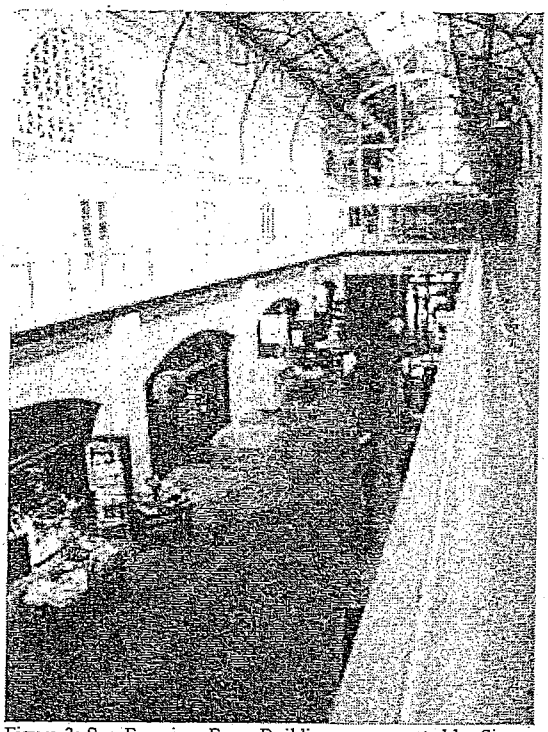

Figure 3: San Francisco Ferry Building, as renovated by Simon Martin-Vegue Winkelstein Morris (2003).

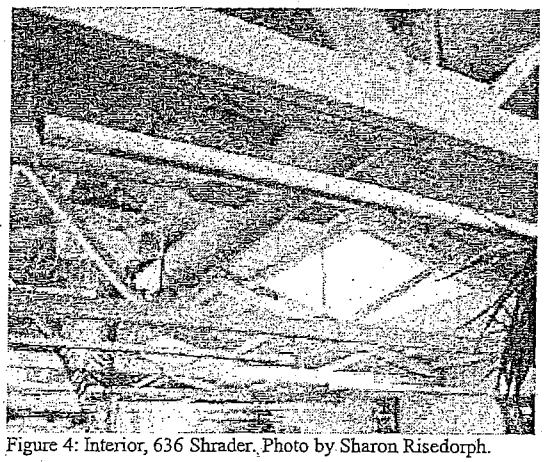

Figure 4: Interior, 636 Shrader. Photo by Sharon Risedorph.

resource as commonplace or inessential. Education and heightened consciousness are therefore essential to preservation.

Adaptive reuse is a time-honored means of giving valued existing buildings a new economic life. It applies to large-scale and small-scale buildings alike. The Ferry Building, a once-vulnerable landmark that had fallen into disuse, has been converted into offices, restaurants and high-end food shops (Fig. 3). Reintegrated into the fabric of the city through the demolition of the Embarcadero freeway, the building has become a "destination architecture" for tourists and locals alike. While the building has lost some of its industrial grittiness, its "prettified" central space is again enjoyed by thousands.

The garage buildings are small-scale analogues of the Ferry Building, particularly in the combination of historicist exterior and industrial interior. Remarkably adaptable, a list of new uses includes a clothing store, pharmacy, art gallery, music agency, architectural office, high school, condominiums, church, strip club, and high-end residence and artist's studio. Some of these are illustrated in Figure A11.

The uneven quality of the new designs suggests that financial return, not architectural preservation, was the primary motive for the adaptations. Some of the facades have been renovated sensitively, like the Patagonia store at 770 North Point, while others have been stripped bare. The interiors vary, too. The music agency at 636 Shrader exploits the building's tall ceilings and exposed trusses (Fig. 4), while the Walgreen's Pharmacy on Polk Street (Fig A14) is indistinguishable from any other pharmacy.

While adaptive reuse is crucial, it is a mixed-bag as presently conceived and executed. The financial motive must be accompanied by a mandated restoration program so that the integrity of the building is not compromised. The goals of giving the building new life and respecting its aesthetic identity are not mutually exclusive.

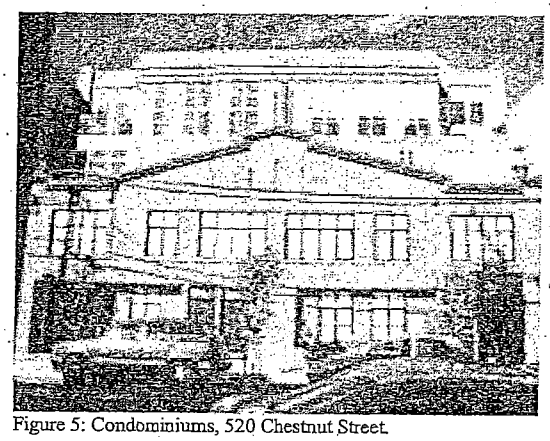

Figure 5: Condominiums, 520 Chestnut Street.

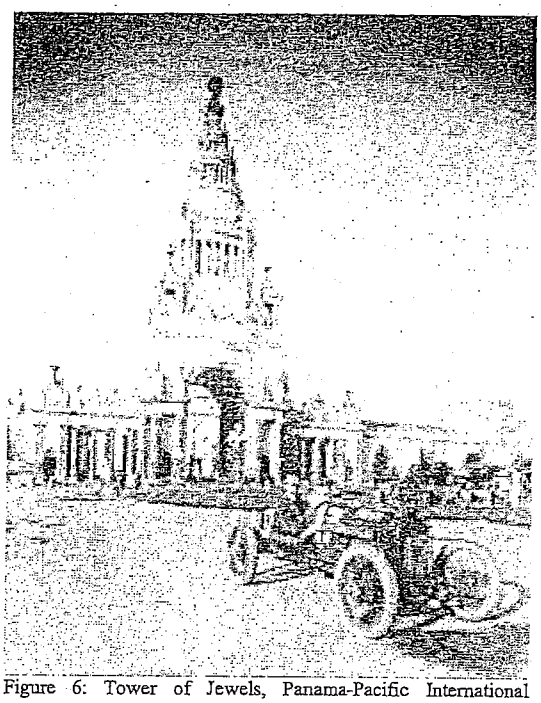

Figure 6: Tower of Jewels, Panama-Pacific International Exposition (1915). San Francisco History Center, San Francisco Public Library.

Government Oversight

The San Francisco Department of Planning reviews all proposals to modify the garages, which lately have been officially recognized as "historical resources."[10] However, the review process seeks to balance the financial interest of the property owner with the preservation interest of the public. Due to its public nature and superior architectural quality, the façade is deemed to be the exclusive source of the historical significance of the entire infill structure.[11] Indeed, the façade is the only portion of the building that most San Franciscans encounter. The review of a proposal to alter a significant garage therefore focuses on the preservation of the façade. The interiors--industrial, anonymous and private--are considered insignificant. This policy usually enables owners to alter or demolish the industrial interior. It facilitates the development of the property and its conversion to residential use.

However, I don't believe that it is possible to preserve the significance of a structure by saving its most public fragment. The result is a stage-set that lacks architectural integrity. Plus, the functional requirements of the new use can adversely affect the façade. This is evident in the condominium project at 520 Chestnut Street (Fig. 5). The facade maintains its original proportions, Main Street-style parapet, decorative recessed lancets beneath the parapet, and strip of windows across the 2nd floor. The bulk of the new construction is set back on the lot, so that the façade maintains its presence on the street. However, despite these concessions, the façade is thoroughly integrated into the prevalent residential imagery. Its industrial roots are thoroughly obscured.

Dichotomy of Façade and Interior

Finally we shall argue for the symbolism of the ugly and ordinary in architecture and for the particular significance of the decorated shed with

EXHIBIT 1: Mark Kessler, "Educate, Preserve, Reuse: The Good (Not Great) Garage Buildings of San Francisco"

Unedited Draft
not for distribution

Mark Kessler

a rhetorical front and conventional behind: for architecture as shelter with symbols on it.

Venturi, Scott Brown and Izenour
Learning from Las Vegas, 1977

These garage buildings are typical of small-scale commercial and residential structures situated on city streets. Front and side walls are built on the property line, with no more than a few inches separating adjacent structures. From the corridor of the street, perception of the structure is limited to the façade. The tight packing of rectangular buildings placed side-by-side precludes any notion of architectural object or autonomous form. Instead, the street becomes the primary architectural statement, defined by the continuous, if diverse, wall of building fronts that separate public from private property.

All of these buildings might be referred to as "decorated facades" rather than "decorated sheds" due to the extent to which the building is concealed and the façade relates to the theater of the street. In the service of a commercial venture, the façade assumes the thinness and communicative potential of a billboard. Rather than attempt to restore unity by treating the front as simply the fourth side of the industrial box--as a modern movement architect might do--the architects of these buildings revel in the opposition between inside and out and celebrate the public nature of these facades.

The dichotomy in the treatment of the outside and inside can be expressed as a series of oppositions: historicist/industrial, public/private, light/dark, planar/spatial, solid/void, semiotic/tectonic, composed/engineered, finished/unfinished.

Developed so late into the Beaux-Arts era, this building type was amongst the last to employ this dichotomy. The large-scale new building types of the 19th-century, train stations and exposition buildings in particular, pioneered and perfected it. But these types had the dual responsibility of expressing the aspirations of the urban polity while accommodating thousands of visitors. The symbolic program was deemed the province of architecture, which responded with monumental "head buildings" that employed giant portals to celebrate passage. The engineer, responsible for spanning great distances while admitting natural light, designed sheds of iron and glass. Sheds and trains were united as products of the industrial age.

The contrast between head building and shed was controversial throughout the evolution of the building type. Historian Carroll L.V. Meeks, describing the tension in the latter half of the 19th century, said,

> Some architects felt that the two elements [head building and shed] were so discordant in character that unification was impossible, and that no relationship more subtle than contiguity could be attempted. St. Pancras was unique in that its shed was designed before the architect of the station had been selected. Whether or not the architect was concerned with both, the outcome was that a masonry forebuilding usually emerged victorious, with the alien metal shed hidden behind it, visible only from the sides.[12]

The garages are noteworthy for the adaptation of this dichotomy to buildings of such small scale, modest use and limited technical requirements. While the garages lack the extreme opposition between symbol and space that characterize train stations and exposition buildings, the constituent elements of the dichotomy function similarly: the facades communicate through signs and symbols, the structure efficiently spans over the interior space. Despite the similarity however, the significance and meaning of the formula is transformed in these later, smaller structures.

The garages housed a progressive technology in an architecture both conservative and not technically ambitious. While the automobile represents technological progress relative to the train, the interior structure of the garage is no advance over the train shed. And, when viewed retrospectively through a modernist lens, *both* the head buildings of train stations and the garage facades are stale and corrupt architectural expressions, regardless of whether the buildings accommodated trains or cars.

When confronted with a new program, the architects relied on precedent, adapting a formula that had worked for a host of building types, large and small, including train stations, stables and fire

Figure 7: 1725 Sacramento Street.

Figure 8: 830 Larkin (date unknown). San Francisco History Center, San Francisco Public Library.

stations. But the adaptation is devoid of the tension between architecture and engineering (inclusive of both shed and train) that is characteristic of the great urban station. Quite the contrary, the automobile is celebrated as a "liberated" form of progressive technology that literally jumps the tracks, assuming its rightful place as the object whose passage is framed by the portal on the head building. Indeed, this shift is already evident in photographs taken at the Panama-Pacific International Exposition (PPIE) of 1915 (Fig. 6). Here, automobiles and neo-classical architecture appear in perfect harmony--as evidence that human endeavor links a glorious past with a promising future.

The garages lack the scale, civic purpose and pomp of the exterior architecture of the PPIE, which was not designed with the automobile in mind. The exposition architects' unilateral focus on the exterior half of the dichotomous equation is partly responsible for the frivolous aspect of their courtyard architecture.[13] By contrast, the garages, which *were* designed with the automobile in mind, display a gritty integrity. In part, this results from the appearance of industrial windows and doors on the façade. More importantly, this integrity is rooted in the ability of the automobile, as a scaled-down and portable new mode of transportation, to sustain an analogous, scaled-down, and decentralized building type. The garage architects mediated the extreme opposition of architecture and engineering that characterized the earlier building types, replacing it with an urban grittiness and an urbane humor appropriate both to the automobile and to city streets. In doing so, they reinvigorated the formula.

The train station appears as a ubiquitous influence on the designers of the garages. This is evidenced in the simulation, on a micro-scale, of a juxtaposed neo-classical head building and industrial shed. On corner lots, for example, the historicist vocabulary and parapet of the façade is applied to the first bay of the side elevation. Beyond that, the side wall assumes the rough industrial treatment of the interior, i.e., the shed. This creates the illusion of an architectural volume in the front of the lot, defined by an historicist vocabulary that turns the corner (Fig. 7). In other instances, the extension of the historicist vocabulary to the side does have volumetric integrity, wrapping around a front bay that is uniquely two-stories in height.

These examples reveal the self-consciousness with which the designers of these buildings pursued this dichotomy as a function of architectural precedent. They also expose the shortsightedness of applying current preservation criteria to these buildings. When we bisect these buildings in our assessments, extending "significance" and protection just to one half of a balanced equation, we fail to appreciate and forever ruin the conception of the architect. The significance of these buildings resides not in the façade alone, but in the adaptation of the dichotomy to a new

Mark Kessler

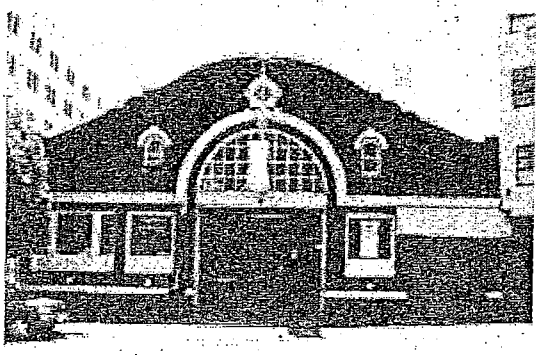

Figure 9: 541 Ellis Street.

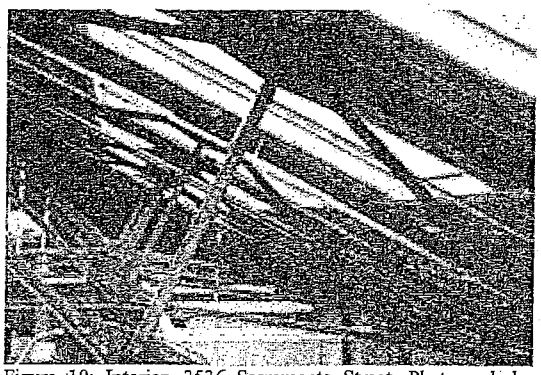

Figure 10: Interior, 3536 Sacramento Street. Photograph by Sharon Risedorph.

building type devoted to an exciting technology.

The Buildings

The garages are either one or two stories, the former generally around 18-feet in height, the latter averaging about 30-feet. The neo-classical "skyscraper" garages, designed by the same architects, employ the smaller garage type as an architectural pedestal for a much taller building (Fig. A10: 375 O'Farrell). Their widths vary with the lot, but are generally between fifty and one-hundred feet.

One feature that distinguishes a garage from its residential or commercial neighbors is the scale and frequency of its entry doors, which are sized to accommodate automobiles. The lack of a standard door distinguishes the garage from most other building types on the street. While adjacent shops and apartment buildings may also offer over-scaled portals to invite entry, the composition ultimately frames a conventionally-sized door.

The large voids dematerialize the wall at the street level. Even when the ratio of solid to void is still large, the contrast between the heavy exterior and the poorly-lit interior is striking--more so than a comparably composed façade of wall and *glazed* openings. Amongst the various building types that present a façade to the city street, this feature is unique to those--including garages and fire stations--that are usually open and dedicated to the passage of vehicles.

When the business is closed, the door--usually a modern metal roll-up type--serves as a symbolic stand-in for the industrial interior. If the building has steel sash industrial windows, doors and windows both project the interior aesthetic onto the facade. The façade at 830 Larkin, which boasts vast glazed openings separated by elaborately decorated pilasters, illustrates the balance that can be achieved between the historicist and the industrial (Fig. 8).

The façade always includes a parapet, 2-3 feet in height, that liberates the top profile of the façade from that of the roof behind. There are three major types of parapet profile, flat-topped, bowed, and pedimented. Mission-style and/or Main Street-style parapets are hybrid variations that string together flat and inclined segments, and arcs, all in the service of an overall symmetry that peaks at the center (Fig. 9).

The interiors are rugged, dirty and in various states of disrepair. Rational expressions of structure, the space is divided into rectangular, equally-spaced, structural bays. The program favors a clear span at the top level, which is usually accomplished with wood or metal trusses, the top chords of which match the profile of the shed. In perspective, the chords of the trusses foreshorten and gather together, forming complex, overlapping rhythms (Fig. 10). Wooden bowstring trusses are often filled-in with a stabilizing grid of diagonal latticework (Fig. A8).

Flat roofs and floor slabs are supported by deep concrete beams; this structure--shallower than the truss--requires one or two rows of freestanding

columns to break up the span. At the side walls, the spanning members drop their load on structural side walls, or applied brick or concrete piers.

Natural light is limited. On stories beneath the top level, natural light comes through the garage door openings. Occasionally there are windows across the rear. Skylights bring natural light to the middle of the top level, but they are usually too few in size and number to flood the space. In two-story garages, the darkness, squat proportions and heavy concrete ceiling of the ground floor contrasts with the light open space above.

Programmatically, these are simple buildings: a rectangular enclosure provides shelter for automobiles, mechanics/attendants and clients (Figs. A1-9: plan views). Tall ceilings and clear open space define a flexible interior that facilitates parking, circulation and service. Typically, a small administrative office is located on the façade, adjacent to the entrance--a good location for customer support and general monitoring. In a single-story, single-span structure, the facade might provide a single, central wide-bay opening, and flanking windows to light the interior and the office (Fig. A1: 4419 Geary). However, the single office--a programmatic asymmetry—demonstrates just how elusive simplicity can be. The office precludes the possibility that identical windows symmetrically disposed about a central garage-door opening will correspond to identical plan events behind.

The earlier brick garages from the 1910's are usually one story in height. Given the limitations of spanning over large openings, these facades have fewer and smaller openings than their concrete counterparts. As a result, these garages are more expressive of wall. When the brick is exposed--as opposed to covered in stucco—the façade imparts considerable weight and mass (Fig. A4).

Many of these buildings are converted stables (Fig. A1-2). Roughly half of the brick buildings feature a mezzanine that is inserted into the front structural bay. The floor aligns with the lower chord of the truss. While some building owners believe that these mezzanines were built as hay-lofts, they are generally detailed as small apartments. The mezzanine enables the architect to design the façade as if it were two-stories in height (Figs. A2-3). This "deception" is conceptually related to the false suggestion of a head building, discussed above; both strategies amplify the scale of the building as perceived from the street.

The buildings built in the mid-twenties are likely to have second stories and/or basements, both served by ramps. In one prominent sub-type that features two wide ground-floor arches, the ramps--up and down--are recessed several feet behind the façade (Fig. 7). In garages with three or more bays, ramps are articulated on the ground level of the façade as dedicated wide-bay openings. A common facade solution for a two-story building with basement includes three arched openings, one serving the street level, and the other two devoted to ramps leading up or down. If an office is not present in the front, this tripartite symmetrical composition is balanced and works well (Fig. A9: 460 Eddy). If an office needs to be accommodated, a 5-bay solution, with a bay rhythm of ABCBA, can incorporate the office behind one of the narrow "B" bays. (Fig. A3: 469 Eddy).

The ramps run--like the automobiles--perpendicular to the façade, and along the building's side walls. The accommodation of ramps in dedicated bays exerts considerable influence on facade composition. Typically, this structural arrangement, i.e., a multi-bay frame beneath a single-bay roof, is expressed on the façade as a sub-divided wall subsumed beneath a unifying roof-line or parapet. And while some garages present this sub-division as a wall with punctured openings (Fig. A3: 469 Eddy), and others as a gridded elevation (Fig. A9: 1550 Union), all of the true two-story buildings (as opposed to one-story buildings with mezzanines in the front) are related by this compositional organization.

The fact that the ramps begin their incline at the façade, and don't have an internal landing, maximizes the square footage devoted to service or parking. The ramps create levels that, while vertically stacked, are mutually exclusive because there is no internal link. This stacking is analogous to double and triple-decker houses with separate front doors and dedicated stairs for each flat.

The garages appropriate the public right-of-way to complete the circulation loop. Conceptually, this arrangement crystallizes attention on the façade as the thin membrane separating inside and out. As the

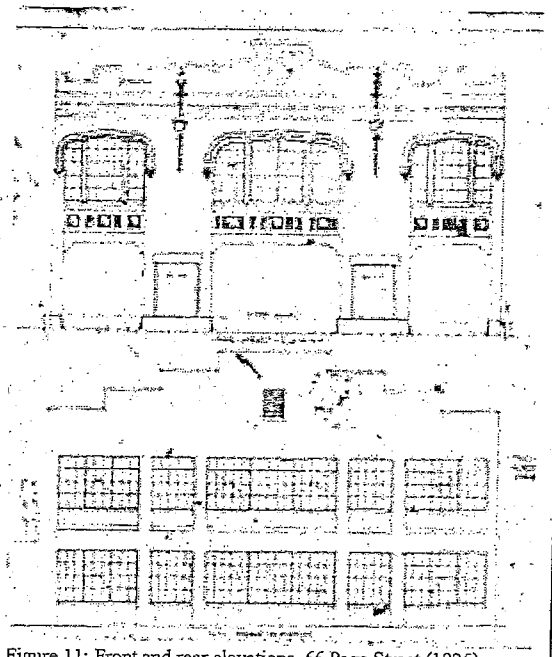

Figure 11: Front and rear elevations, 66 Page Street (1925).

ramps always occupy the end bays, and as the inclines--up and down-- terminate at the plane of the façade, and as the circulation loop extends beyond the façade, vehicles going from the basement to the 2nd floor engage in a complex three-dimensional rotation about the middle of the façade. While this particular excursion may only occur rarely, its possibility illuminates an opposition between a stable and symmetrical two-dimensional elevation, and a dynamic, asymmetrical circulation pattern.

As the number of cars increased in the 1920's, San Francisco passed ordinances limiting the time that cars could park by the curb to less than an hour.[14] This was a major impetus to build garages. Also, the increasing number of cars required additional repair garages to service them. Analogous to train stations, the garage was a depot, a home for the automobile. The car was still a status symbol, even though Ford had already greatly reduced the price of buying a car.[15] A portal-like entry into a stately façade enhanced pride of ownership.

While the combination of historicist façade and industrial shed is a formulaic inheritance, it also works well in accommodating the programmatic requirements of parking and repair. The façade glorified the comings and goings of a status-conscious clientele; once inside, the conceit of decorum was abandoned in favor of a raw space responsive to the needs of the automobile.

The garages are efficient and compact working buildings. Examples of this efficiency include the dedicated ramps, the tall, clear-span space at the top level, and the small offices. Even the original omission of conventionally-sized doors, now regarded as an oversight, is evidence of an efficient building catering to vehicles--not to people. The rational, concrete garages with ramps, contemporaneous with LeCorbusier's houses of the 1920's, can be interpreted as machines for *automotive* living.

An appreciation of the entire architectural conception reveals to us again why it is shortsighted to determine that only one half of the dichotomy--the façade--is architecturally significant and worthy of preservation. When we demolish the shed, we forever disrupt the integrated, three-dimensional conceptualization and reveal the shallowness of our own grasp of the importance of these buildings. When we deem certain facades to have architectural integrity, based on the quality of the historicist overlay, we misunderstand that this overlay functions in a larger, more contemporary, architectural conception.

The formal compositions described above exist independently of the historicist overlay and semiotic communication that is such a compelling aspect of these facades. However, the ornamentation and historicist elements are deployed to visually reinforce structure and composition. Medallions and shields align with the centerline of major columns or structural bays (Fig. A9: 1550 Union). Panelized transoms form a horizontal band--continuous or discontinuous--above the ground floor openings and beneath the second floor windows. Arches define major bays in the composition, and appear on either the ground or

Figure 12: 415 Taylor Street (1929). San Francisco History Center, San Francisco Public Library.

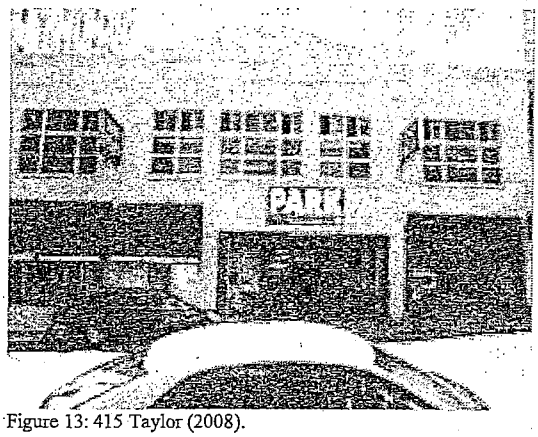

Figure 13: 415 Taylor (2008).

second floor (Figs. A6-7). Entablatures typically extend straight across the façade, unifying the composition by placing a cap on the sub-divisions below. The continuity in the placement and function of the historicist elements--as opposed to the specific historical style employed--bind the buildings together as a type.

We can also distinguish between composition and historical narrative by comparing the front and back facades. At 66 Page Street, designed by the O'Brien Bros. in 1925, both front and back share an ABCBA composition, but only the front receives the Neo-Tudor treatment of shallow-pointed arches, crenellated parapet and medallions (Figs. 11, A9). By contrast, the rear façade--which fronts on an alley--has a singularly industrial appearance.

Consideration of the organizational and compositional patterns of the facades, as an underlying source of continuity that exists independently of stylistic overlay, is a modern mode of classification that we apply retrospectively. It emphasizes form over content, structure over sign and symbol, and type over individual building. While useful in defining the abstract integrity of the type, this approach does not address the historicism that is central to these facades.

A comparison of the archival and contemporary photos of the garage at 415 Taylor reveals the power of architectural signs to engage and communicate (Figs. 12-13). Originally, the facade relied on the active inflections of insubstantial parapet profiles to recall Mission style train stations in general, and the San Francisco train depot, in particular. By contrast, today's stripped façade is like a blank billboard. This example demonstrates that while a structural approach tends to devalue historicist overlay as arbitrary and superficial, that overlay is nevertheless crucial to the typology.

The O'Brien Brothers dressed up their garage facades in different styles, including Mission, Beaux-Arts, and Neo-Gothic. While the choice of style appears to have been arbitrary, the commitment to decorate was not. We may never know why one garage became Mission and another Neo-Tudor. However, the arbitrary reduction of entire stylistic vocabularies to two-dimensional facades provides further evidence that the dichotomy was appropriated for reasons other than the original symbolic program of the train station. Pride of ownership replaced civic grandeur as the message communicated, an ironic if fitting expression for this new technology that personalized and privatized mobility.

The irony was not lost on the architects, who approached their appropriations with a wry sense of humor, rather than naiveté or misguided adulation. One example is the garage at 142 Tenth Street (Fig. 14), that incorporates its side elevation to complete the symmetry of the front elevation (AABAA). Another example is the garage at 1335 Fulton, that mimics the classic train station motif of the triple pediment with arched openings (Fig. 15). The

Figure 14: 142 Tenth Street.

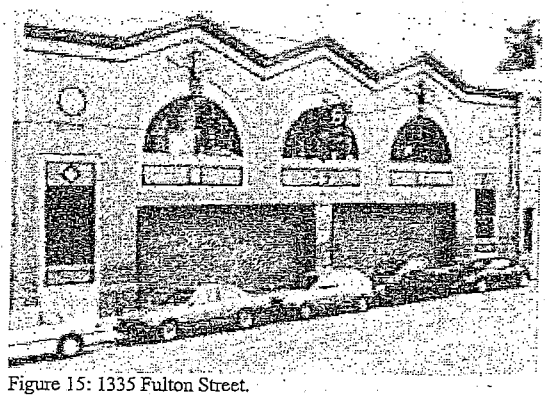

Figure 15: 1335 Fulton Street.

design quotes Atwood's station at the World's Columbian Exposition, the waiting room at Penn Station, and countless reincarnations across America. The humor resides in the flattening of the volumetric reference into mere signage, and the application of the motif to the lowly car garage.

Typology

Like any group of buildings constituting a type, the garages share essential properties, including siting, use, age, materials, and design approach (i.e., the dichotomy). Circumscribed within this commonality is a rich diversity of designs, attributable to the unique circumstances surrounding each project. A typological approach encompasses the simultaneous awareness of the continuities and discontinuities amongst the examples.

The buildings' vulnerability increases when they are considered in either of two ways, as a large, undifferentiated group, or as isolated buildings disconnected from one another. Both approaches are symptomatic of a critical myopia that stops a layered and detailed reality from coming into focus. The anonymity of the buildings contributes significantly to this myopia, either by precluding a *collective* appreciation, or by permitting the isolation of individual examples.

The garages are anonymous both in terms of attribution and the tendency of infill buildings to blend into the urban fabric. Attribution is difficult, diffuse and uncertain. In many instances, the architect is unknown. In other cases, design responsibility appears to have been assumed by a property owner, engineer, or building contractor.[16] Many of the garages were designed by architects well-known in their day, but less so today. Two notable examples are the firms of Crim and Scott and the O'Brien Bros., who designed many exemplary and influential garages. However, while they enjoyed excellent reputations, and while their work often appeared in the pages of *Architect and Engineer*, their garage buildings were almost never published.[17]

The overall vagueness in authorship--in combination with the low-brow use--contributes to ambiguity in assessing architectural merit. In the absence of attribution to an architect of universal acclaim--Julia Morgan, Willis Polk or Bernard Maybeck, for example--the criteria used to establish merit shifts from the definitive and fixed to the relative and equivocal. Significance becomes a function of considerations that are literally and figuratively external: context, historical association and subjective evaluation.

The preservation of just the façade of an integrated (and willfully dichotomous) architectural statement is consistent with a relativistic approach that views the façade as a bit player, a "contributory building," in a continuous streetscape. Ironically, the preserved fragment acquires an even greater degree of anonymity, as loss of character results in banality. The building's autonomy and integrity, either as a "machine for *automotive* living," or as a

late example of Beaux-Arts design applied to a transportation use, has no inherent value.

This study organizes the buildings into a typology to counter the ill-effects of anonymity and indifference. The classification into sub-types establishes parallels and differences that encapsulates the group and fosters a finer-grained appreciation of the type.

The elemental components of the dichotomy--façade and plan type--are essential. "Façade" refers to composition and stylistic overlay. "Plan type" encompasses lot dimensions, structure, the number of stories and program. The plan type exerts influence over the façade in the number of structural bays, the profile of the roof, and the presence of ramps, mezzanine, and office. Whether the enclosing walls are brick or concrete is another basic means by which structure impacts façade.

The plan types divide into three major categories: one-story brick, one-story brick with mezzanine in the front, and two-story concrete. Basements, which are accessed by ramps and therefore influence the façade, can occur in any of these categories. The number of bays, a significant property of façade composition, is a function of lot width and the number of stories--the latter because basements and second floors require ramps, which are accommodated in dedicated bays.

The historical styles that grace the facades fall into three large categories: Mission, neo-Gothic and Beaux-Arts. While these labels are broad and intended to facilitate very basic divisions, there is some overlap and ambiguity resulting from an eclectic approach. The ambiguity is not only evident in the garage facades, but in the historical precedents upon which they are based. The architecture of the Panama-Pacific International Exposition, for example, synthesized many antecedents into a generalized eclecticism (Fig. 6), referred to in contemporaneous accounts as "Mediterranean."[18]

A matrix of categories charting facade style over plan type--a mix and match approach to the dichotomy--would yield nine groups. For example, Mission/one-story brick (Fig. 9), or, neo-Gothic/two-story concrete (Fig. A9). However, while these groups do indeed underpin the all-important relationship of façade to industrial shed, they fail to adequately capture the salient identifying characteristics that link particular buildings. For example, while 66 Page Street (Fig. A9) and 1725 Sacramento (Fig. 7) both qualify as neo-Gothic/two-story concrete, Sacramento has a stronger visual connection to both 240 Pacific (Fig. A10)--a one-story building--and 830 Larkin (Fig. 8), a Gothic/Renaissance hybrid.

The matrix is inadequate because it fails to take into account two influential factors: (1) overall width and number of bays, and (2) specific design motifs with strong identifying properties. Thus, in the example cited, a designation of "Gothic/two-story concrete" is too generalized in that it fails to acknowledge the identifying potential of a particular motif, the twin basket-handle arches. And, due to an eclectic approach, the Gothic motif does not always appear in the context of a singularly Gothic vocabulary.

However, if the basic categories of façade and plan type are acknowledged, we can introduce a more flexible classification system that is more responsive to the associative link between buildings. In some cases, the link will be a particular motif--like the basket-handle arches. In other cases, it will be the number of bays, the material, the historical style, or reference to a precedent building type. The proposed sub-types are therefore not mutually exclusive. For example, a particular building might reasonably fall into two categories simultaneously, like "Mission" and "Station," precisely because many train stations were designed in the Mission style. However, despite the occasional ambiguity, the basis by which buildings are grouped should always be intuitively clear and straightforward.

The typology is one of façade. This is ironic, given the centrality of the argument against preserving just the façade of a garage building. Hopefully, that argument has been convincingly made, i.e., that these buildings are *integrated* responses to the conditions that caused their construction. Here is a synopsis of the categories, each one referred to as a "type":

- Adams Type: Named after the Henry Adams House, designed by H.H. Richardson (1884-1886, Washington

D.C.). The lower two floors describe its basic form: two adjacent basket-handle arches that are the primary features of a base that supports a *piano nobile* with a row of discrete, deeply-set, vertically-oriented windows (Figs. 7,8). It transforms into other sub-types with symmetry built around an odd number of bays (Fig. A9: 460 Eddy, 1550 Union).

- Gothic Type: Displays one or more characteristic motifs: elliptical, Tudor or depressed arched windows and garage door openings; "battlement" parapets of crenels and merlons; and, drip and label moldings. Whether one or two stories, these are typically concrete buildings built in the 1920's. They are closely related to the Adams type, but with livelier parapets that peak over a wide center bay (Fig. A9). Related buildings with Western or Main Street-type parapets are included here (Figs. 16, A8).

- Mission Type: Displays one or more characteristic motifs: a large portal centered beneath a cresting parapet composed of stepped and arced segments; shallow clay-tile roofs and eaves, used as ornaments applied to the vertical surface of the facade; Churrisgueresque window surrounds; and, multiple two-dimensional vertical projections--topped with curvilinear profiles--that represent towers. The facades are symmetrical compositions, usually composed of an odd-number of bays. Reflective of an early date of construction, there is a preponderance of brick facades, both one-story and one-story with front mezzanine (Figs. 9,12, A3).

- Arcade Type: A wide façade that is sub-divided into an arcade of arched openings (Figs. A6-7, A8: 1945 Hyde, A11: 750 Post). An early and influential example is at 64 Golden Gate (Fig. A3), a Mission-style garage designed by Crim and Scott in 1910. Includes all categories of construction and stylistic overlay.

- Station Type: Displays one of two characteristic portal motifs: a large arched opening centered beneath a pediment; or, three arched openings centered beneath a pediment or flat parapet (Fig. A6). While similar to the Mission type in composition, its stylistic overlay recalls Burnham-style train stations rather than Mission stations (Figs. 15, A2: 636 Shrader). Compositions are symmetrical. This type includes some of the most dramatic and monumental older brick garages, including 2405 Bush (Fig. A4) and 1641 Jackson (Fig. A5).

- Palazzo Type: A more generalized and inclusive classification that refers to rectangular, boxy fronts containing two stories and 3-6 bays. Usually the bays are outlined in applied pilasters and entablatures of Italianate derivation. This type includes three extraordinary demolished examples, 1737 Jackson, 410 Stockton and the base of 375 O'Farrell (Fig. A10).

- Head Building Type: Always situated on corner lots--which expose one side elevation to view--this type mimics the classic train station combination of historicist head building fronting industrial shed. The typical garage façade assumes a volumetric expression. The head building occupies the front structural bay of the building, and often involves a second story or mezzanine; the resultant side elevation exhibits a dramatic shift in height at the juncture between head building and shed (Fig. 14).

This classification is visually based, giving priority to physical, sensory motifs over abstract, formal considerations. As a result, the typology confers respectability on the seemingly arbitrary and shallow assignation of historical style. Viewed retrospectively through a modernist sensibility (and

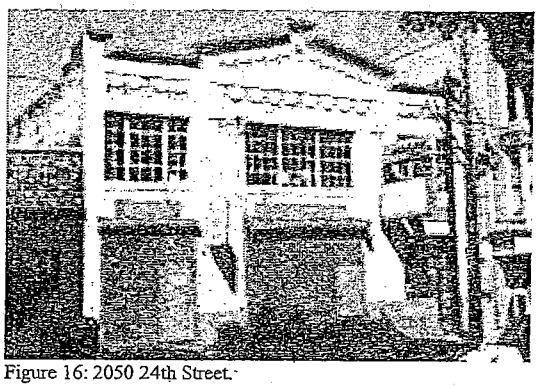
Figure 16: 2050 24th Street.

a post Post-Modern sensibility), the historicist overlay is frivolous. As discussed earlier, there is even evidence that the architects themselves recognized the thinness of the historicist overlay.

However, despite their apparent bemusement, the architects always dressed up the fronts of their garages. The overlay is the means by which these architects celebrated the street, as well as the businesses within. Through this historicism, the architects met an intertwined civic and professional responsibility to beautify the surroundings. The academic skills that the architects brought to bear in this regard were the only tools at their disposal, given their training and the context in which they practiced. Trained in the Beaux-Arts tradition, they knew nothing else.

When we allow style and precedent to influence the classification criteria, we accept the priority bestowed on this aspect of design by the architects themselves. We also acknowledge the strength of historical motifs and symbols to establish identity in our consciousness. This communicative potential does not depend upon a viewer's firm grasp of historical styles. These buildings are eclectic, and are memorable as images rather than examples of historical style. The garage at 830 Larkin, for example, includes Gothic and Renaissance elements, but is memorable despite any confusion caused by its hybrid inspirations (Fig. 8).

Thus, while the criteria references particular styles, the identifying element is usually a particular motif derived from that style. On the facades, these motifs appear out of context from any comprehensive representation of the full set of elements associated with a style or the rules that govern their combination. Thus, the presentations are caricatured, which is consistent with the notion that these facades are billboards.

And, in the development of a particular historicist billboard, the parapet is especially influential. Whether flat (Fig. 8), pedimented (Fig. A1), curvilinear (Fig. 9), segmented (Fig. A8), or some combination of all of these, the parapet is allusive and a source of identifying character. This is so despite its obvious lack of architectural integrity. If we employ a traditional typological criteria—one based on underlying formal relationships--to classify and compare the garages at 2050 24th Street (Fig. 16) and 1550 Union (Fig. A9), we will conclude that they are essentially the same building. However, if we concede that the profile is a powerful determining motif, the buildings are indeed different.

Conclusion

Regarded individually, these buildings would not be as special or noteworthy. Some examples are better than others, a truism that today must take into account horrific modifications and benign neglect as well as original execution. The tendency to take these structures for granted results from the

unevenness in the quality of individual examples, the prosaic, industrial nature of the enterprise, and the aura of anonymity that surrounds them.

When the buildings are reframed as a group, they assume an importance that transcends individual merit, becoming urban in scope. As examples of a type, the buildings refer to one another and to the elusive, abstract ideal. In the mind of an observer whose consciousness has thus been raised, a particularly mangled example transforms itself from urban detritus to a diamond-in-the-rough, followed by a conceptual restoration that reinforces and enhances the complete set of buildings.

The notion of typology is incompatible with either the demolition of examples or their reduction to stage sets that are preserved only to maintain the continuity of the street. When a garage is reduced to its façade, it ceases to exist as an example of the building type. By contrast, when preserved--as a functioning garage or through an adaptive reuse that respects its industrial character--it maintains its connection to all of the other examples of the type, city wide. The preserved building knits the fabric of the city together through the repetition of motifs that recall the city's transportation heritage.

While façade motifs are the most visible elements of the connection that the buildings have to each other--and to us--the relationships run deeper than arches, crenellated parapets and ornamental friezes. These small monumental buildings, that house retail and light-industrial businesses, with large ground floor openings that invite the public to observe their cavernous interiors, are the very essence of heritage and character.

The typological approach extends protections to anonymous buildings and works against their isolation. It substitutes relationship for attribution and/or architectural distinction as the source of value. A building may merit preservation not for its individual excellence, but for its continuity with other examples of the type. The distribution of garages throughout the city, in neighborhoods on opposite ends of the economic spectrum--like the Tenderloin and Russian Hill--is a fortuitous source of harmony that the typological approach recognizes and celebrates.

We may glean valuable insights into the collection as a whole, and into our history and heritage, through the preservation of the entire collection--and other collections just like it. Yet older buildings are everyday threatened by bland new construction. If we "go with the flow" and abandon the past, we cede the high moral ground and encourage the process by which our cities lose authenticity and all look alike.

Architectural history has a vital role to play in raising public awareness about the connection between preservation--which many take for granted as the province of a few civic-minded celebrities and community activists--and sustainability, which has galvanized the nation. The historian is in a unique position to explain how the impulse to study and value a cultural and architectural legacy is compatible, if not identical, with the urge to sustain a diverse urban environment. To explain why bulky new live/work developments may not be preferable to existing urban fabric. To demonstrate that the common garage is a valuable artifact of architectural history. And once the notion of sustainability through preservation gains general acceptance, the historian has an active role to play in assisting local government in the responsible exercise of its function.

Acknowledgements

The students and I wish to thank the following organizations and individuals: the American Institute of Architects, for providing the funding for this research; Mark Luellen, Elizabeth Skrondal and Ozzie Taeb of the San Francisco Planning Department for their generous time and spirit in working with us; Christina Moretta, of the History Center at the San Francisco Public Library, for instructing the students in archival research; Bill Holmes, structural engineer at Rutherford and Chekene, for instructing the class in typical seismic scopes of work required by these buildings; and Alissa Jones and Melanie Gong, two students who provided design templates, page layouts and graphic design for their colleagues. My personal thanks to Sharon Risedorph, a friend and collaborator whose photographic work is nothing short of inspirational. Her photo graces the article cover.

Notes

[1] Richard Longstreth, *On The Edge of the World: Four Architects in San Francisco at the Turn of the Century* (Cambridge: MIT Press, 1983; Berkeley: University of California Press, 1998), 9-39. Citation is to the University of California edition. Longstreth provides a detailed account of the regionalist form of academic eclecticism to which Polk, Maybeck and others in northern California were responsive.

[2] Students determined the status of buildings listed in the directory by cross-referencing it against my database of extant garages, or by accessing the sites on Google Maps.

[3] San Francisco Redevelopment Agency, *Redevelopment Plan for the Transbay Redevelopment Project Area* (June 21, 2005), 8. http://www.ci.sf.ca.us/site/uploadedfiles/sfra/Projects/TB20%Redevelopment%20Plan(2).pdf (accessed November 28, 2008).

[4] Vandana Shiva, "Vandana Shiva in Conversation with Carol Tang" (City Arts & Lectures, Herbst Theatre, San Francisco, CA, July 13, 2008).

[5] Vandana Shiva, *Earth Democracy: Justice, Sustainability, and Peace* (Cambridge, MA: South End Press, 2005), 19-22, 40.

[6] Jane Jacobs, *The Death and Life of Great American Cities*, second printing (New York, NY: Random House, 1961), 187.

[7] Ibid., 150.

[8] Ibid., 187.

[9] Ibid., 188.

[10] United States Department of the Interior, National Park Service, *National Registration of Historic Places, Nomination of Uptown Tenderloin Historic District*, OMB no. 1024-0018 (May, 2008): section 7, 15-6. The Table of Buildings lists twenty-two garages as "contributors" to the proposed historic district. Garage buildings built during the 1910's and 1920's, situated throughout the city, are likely to qualify as historic resources by virtue of their age.

[11] Governor's Office of Planning and Research, *CEQA and Historical Resources, CEQA Technical Advice Series; Background on Historical Resources Preservation* (May, 1996). http://ceres.ca.gov/topic/env_law/ceqa?more/tas/page2.html (accessed August 26, 2008).
Under the California Environmental Quality Act, the governmental agency reviews a proposed scope of work to guard against "substantial adverse change. . .which would impair *the significance* of the historic resource [emphasis added]." It's the significance of the building that is protected, not the building.

[12] Carroll L.V. Meeks, *The Railroad Station: An Architectural History* (New York: Dover Publications, 1995; New Haven: Yale University Press, 1956) 92. Citation is to the Dover Publications edition.

[13] George Starr, "Truth Unveiled: The Fair and Its Interpreters," in *The Anthropology of World's Fairs: San Francisco's Panama Pacific International Exposition of 1915*, by Burton Benedict (Berkeley: Scolar Press, 1983) 162-163. Starr wrote, "It took no very penetrating analysis to conclude that the Exposition's array of imposing facades was all sham and illusion (ibid., 163).

[14] Leon J. Pinkson, "Opinion Divided Over New S.F. Traffic Regulations," *San Francisco Chronicle*, July 6, 1924.

[15] Stephen W. Sears, *The American Heritage History of The Automobile in America* (New York: American Heritage Books, 1977) 143.

[16] US Dept. of the Interior, National Park Service, *National Registration of Historic Places, Nomination of Uptown Tenderloin*: section 7, 31-34. The article "Architects, Designers and Builders" describes the various relationships between the parties involved in design and construction of buildings in the neighborhood during this period. My research of original permits issued for the construction of garages confirms that the arrangements described in the article apply to garages located throughout the city.

[17] An architect's rendering of the wonderful Palace Garage at 111 Stevenson, designed by the O'Brien Bros., was published. See *Architect and Engineer* 64, no.1 (January 1921): 78.

[18] Ben Macomber, *The Jewel City* (San Francisco and Tacoma: John H. Williams, 1915) 27. Macomber wrote, "While the palaces differ widely in details of decoration, they all have a common source; they are all Mediterranean,--not all Byzantine, or Roman, or Italian, or Spanish, or Moorish, but something of each."

Mark Kessler

APPENDIX

University of California, Davis
Design Program
Design 180a Fall 2008

Contents:

Research by: Mark Kessler

Rabi Asghar
Rachael Cacharelis
Patrick Caughey
Jennifer Chang
Shiuan-Han Chang
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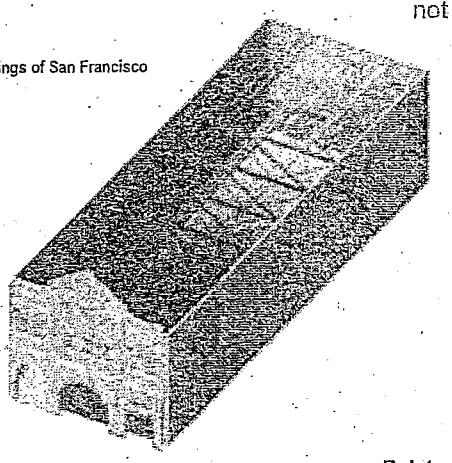
Megan Edgley
Melanie Aspeitia Gong
Katrina Goodwin
Kristina Greenshields
Jennifer Lee
Tracy Lee
Yu Ting Li
Cari MacPhail
Tao Pang
Roshan Patel
Yuan Fu Peng
Nicole Pierce
Josue Quintero
Cindy Seo
Diana Sharkawy
Elizabeth Whyte
Christine Yun

This project was undertaken with the generous support of the AIA Research Program.

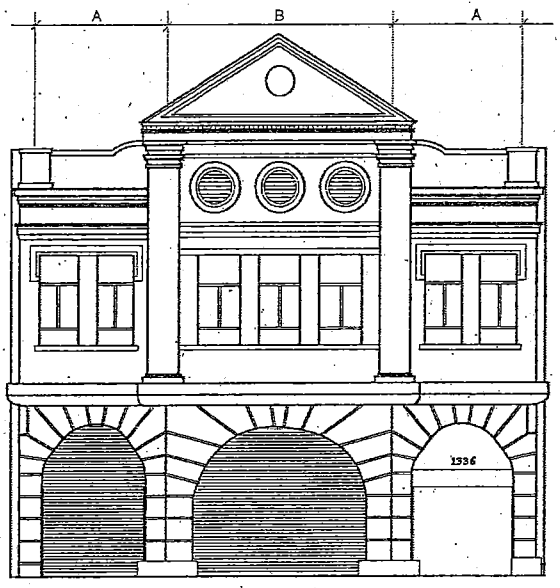
Research was presented to the San Francisco Department of Planning on December 11, 2008

The Good (Not Great) Garage Buildings of San Francisco



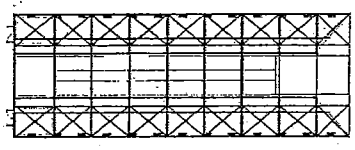
1336 GROVE STREET

Construction Date:	1894
Historical Name:	John Peters Livery & Stable
Present Name:	Lewis Merlo Construction
Architects:	William Smith & J. Freeman
Site Dimensions:	48 ft. x 135 ft.
Struture:	Brick Masonry and Concrete
Zoning:	NC-2 (Neighborhood Commercial, Small Scale)
Facade Type:	Italianate & Rennaissance Revival



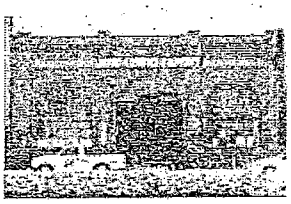
Elevation

Section

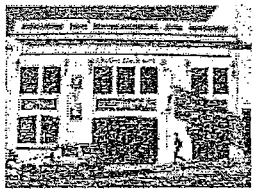


Second Floor

Related Garages



4419 Geary



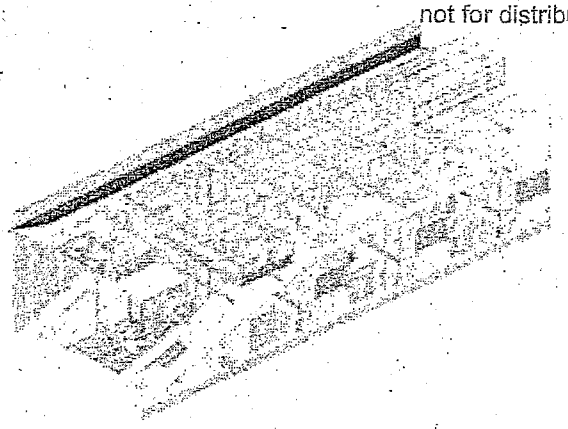
1550 Union

FIGURE A1

EXHIBIT 1: Mark Kessler, "Educate, Preserve, Reuse:
The Good (Not Great) Garage Buildings of San Francisco"

Unedited Draft
not for distribution

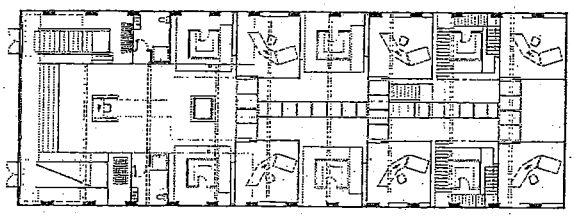
Mark Kessler



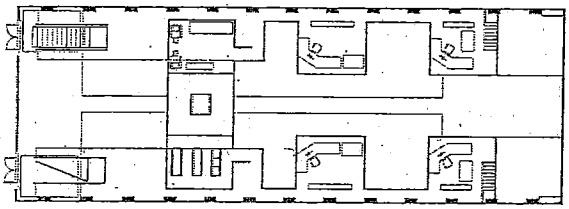
ADAPTIVE REUSE

1336 GROVE STREET

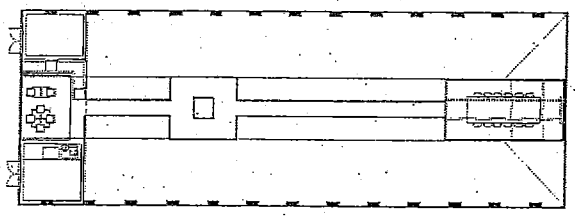
Graduate Student Architecture Studios



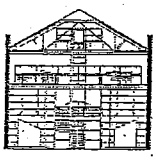
First Floor



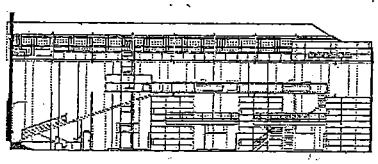
Second Floor



Third Floor

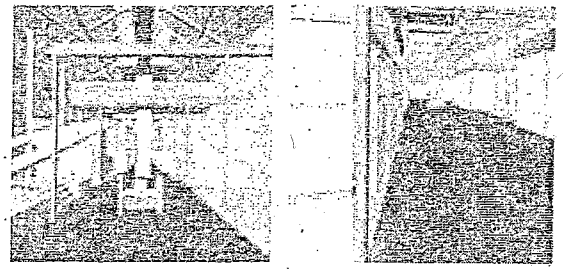


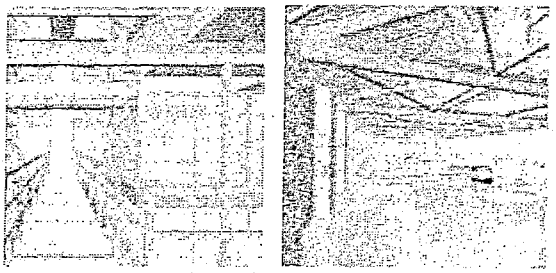
Front Section

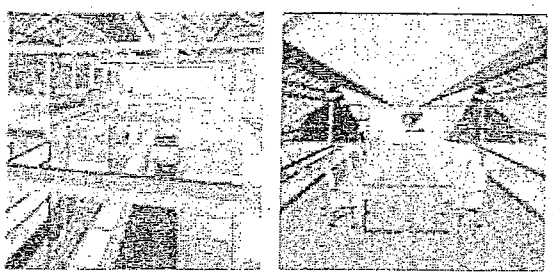


Longitudinal Section

Perspective Views







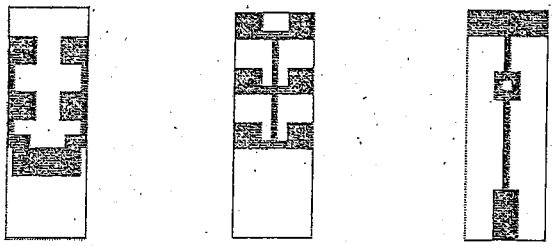
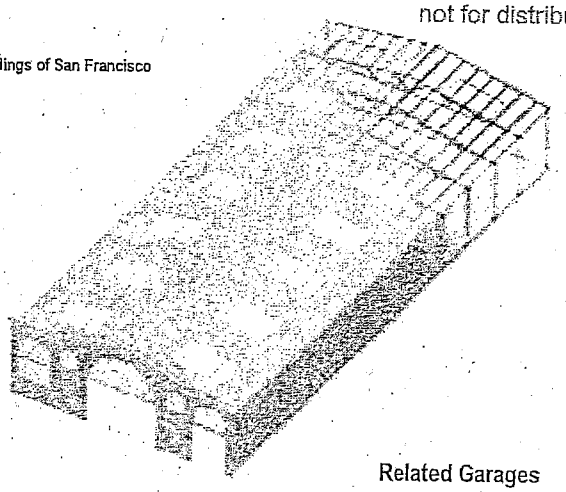


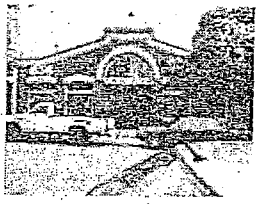
FIGURE A1.1



1776 GREEN STREET

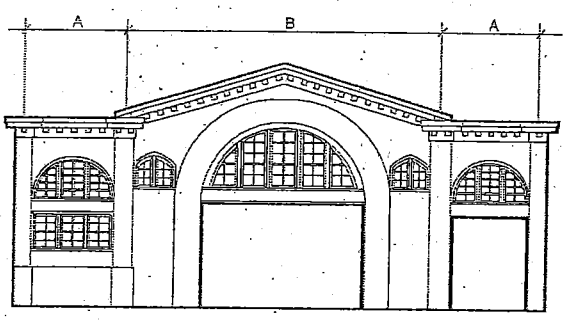
Construction Date:	1914
Historical Name:	California Garage
Present Name:	Green Street Auto Body
Architect:	Unkown
Site Dimensions:	50 ft. x 120ft.
Struture:	Masonry/Concrete
Zoning:	RH-2 (Residential-House, Two Family)
Facade Type:	Station

Related Garages

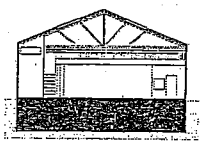


636 Shrader

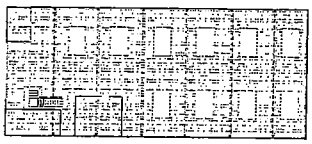
1675 Pacific



Elevation



Section



Ground Floor

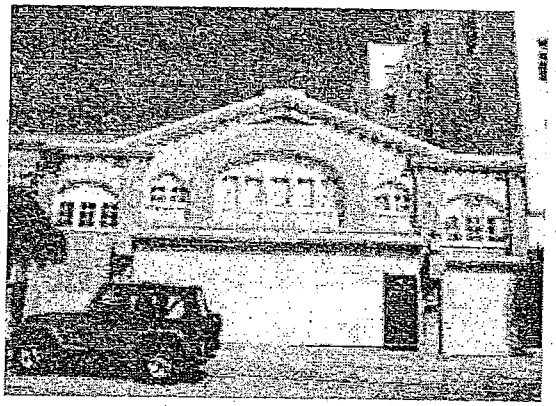


FIGURE A2

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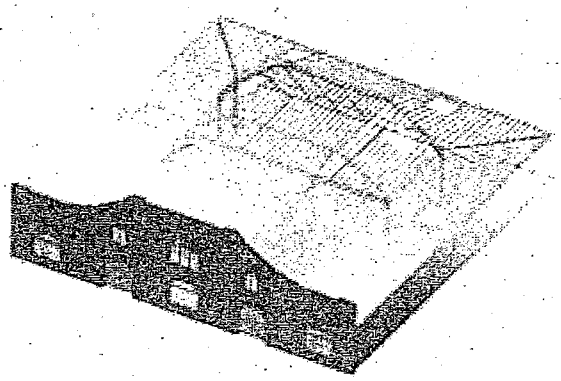
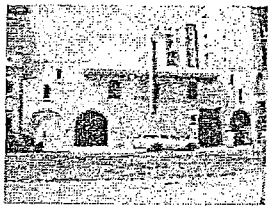


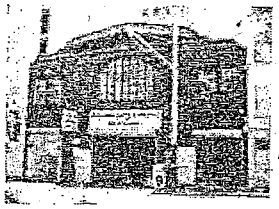
624 STANYAN STREET

Construction Date:	1911
Historical Name:	Seiler & Nolan Garage
Present Name:	Ted and Al's Service Center
Architect:	Crim & Scott
Site Dimensions:	100 ft. x 100 ft.
Struture:	Masonry and Concrete
Zoning:	NC-1 Commercial
Facade Type:	Mission

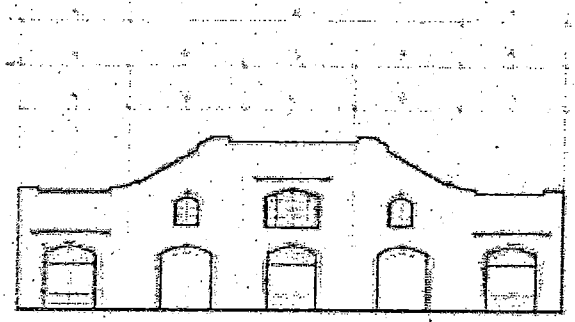
Related Garages



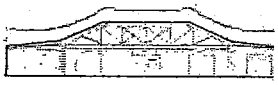
64 Golden Gate



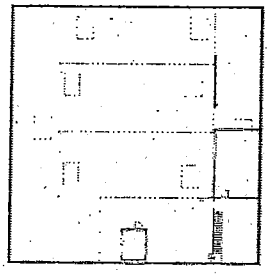
469 Eddy



Elevation



Section



Ground Floor

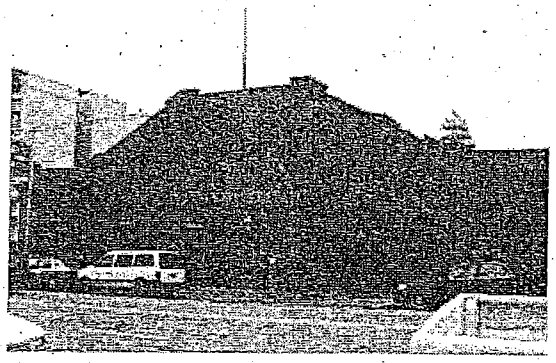
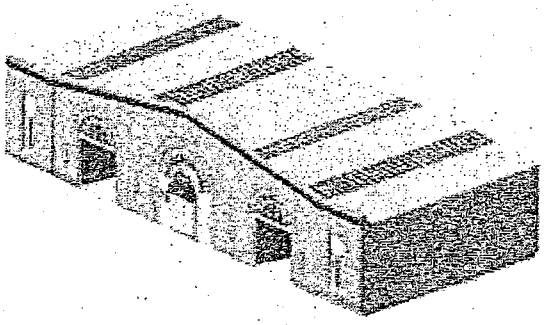


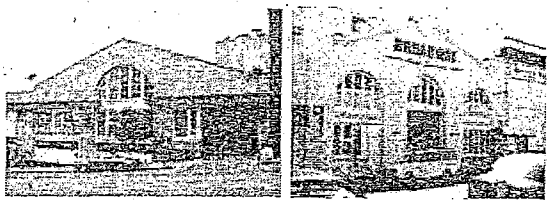
FIGURE A3



2405 BUSH STREET

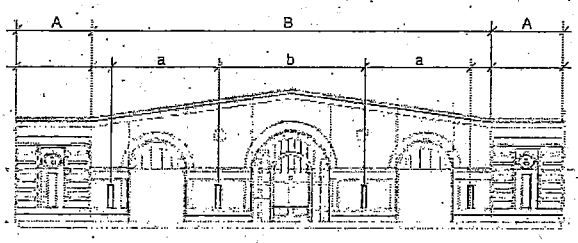
Construction Date:	1916
Historical Name:	Unknown
Present Name:	Hayes Auto Body Repair
Architect:	Unkown
Site Dimensions:	145 ft. x 100 ft.
Struture:	Brick, Steel and Wood
Zoning:	RH-3
Facade Type:	Station Type

Related Garages

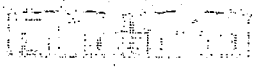


1270 Bush

1675 Pacific



Elevation



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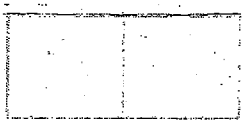


Ground Floor

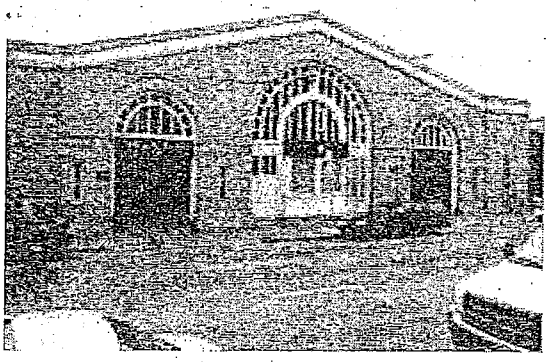
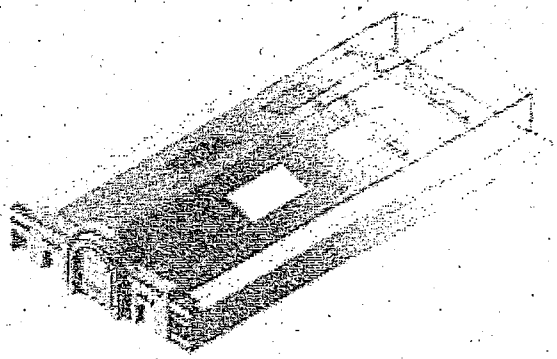


FIGURE A4

Mark Kessler

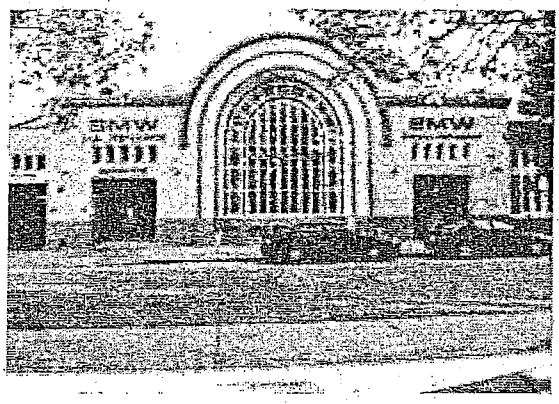


1641 JACKSON STREET

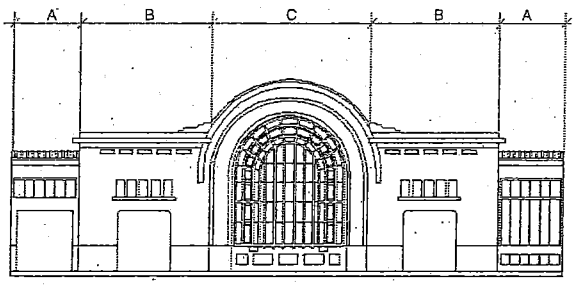
Construction Date:	1914
Historical Name:	Jackson Garage
Present Name:	Phaedrus
Architects:	Unknown
Site Dimensions:	96.6 ft. x 124.25 ft.
Struture:	Brick and Steel Beams
Zoning:	Neighborhood Commercial
Facade Type:	Station Garage

Related Garages

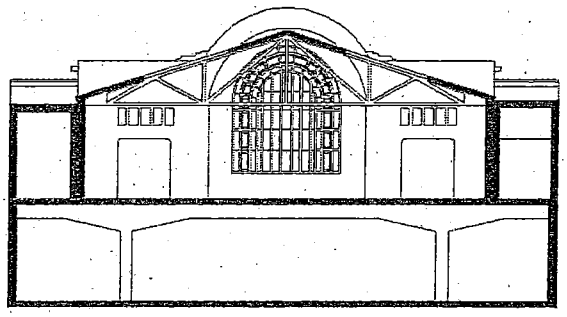
1270 Bush



541 Ellis

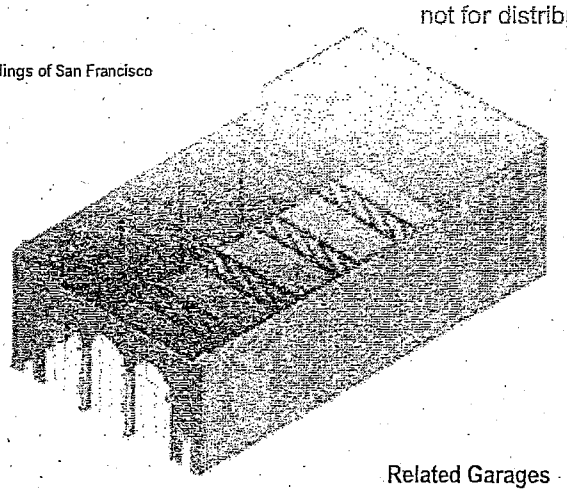


Elevation



Ground Floor

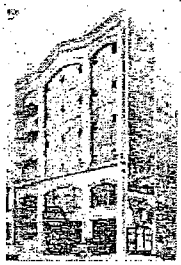
FIGURE A5



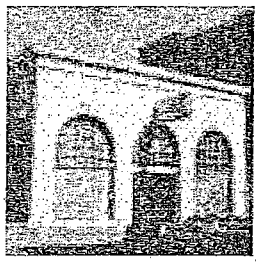
1076 HOWARD STREET

Related Garages

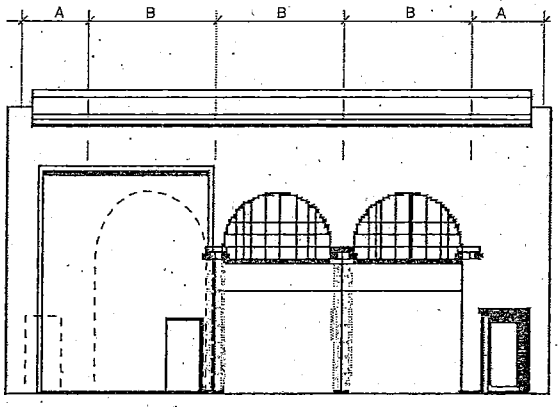
Construction Date:	1923
Historical Name:	Unknown
Present Name:	N/A
Architect:	Unknown
Site Dimensions:	48 ft. x 90 ft.
Struture:	Concrete Masonry
Zoning:	SR2 (Light Industrial, Residential, Commercial)
Facade Type:	Station



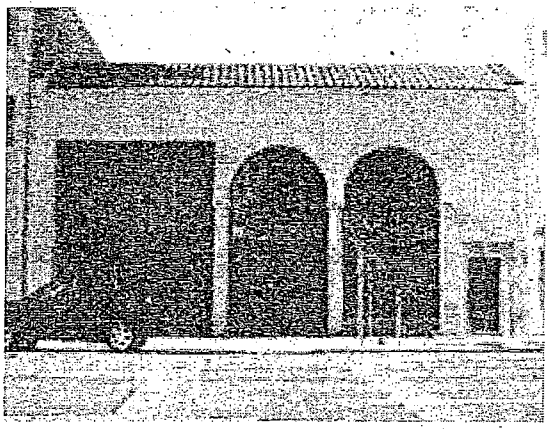
*375 O'Farrell

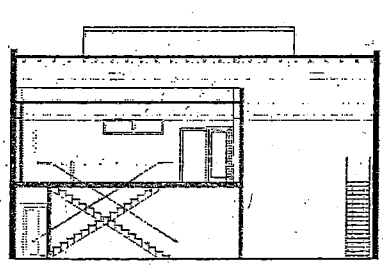


1840 Washington

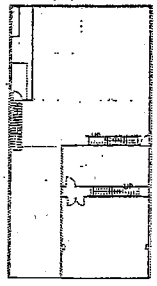


Elevation





Section

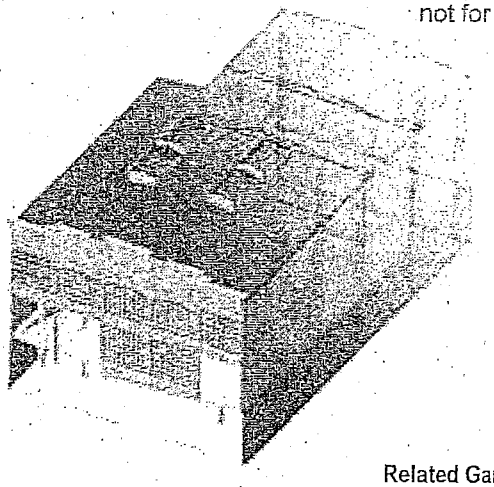


Ground Floor

*Photo: San Francisco History Center, San Francisco Public Library

FIGURE A6

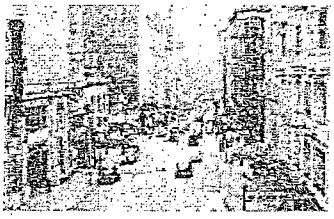
Mark Kessler



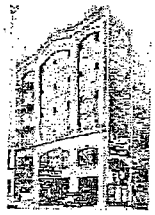
525 JONES STREET

Construction Date:	1922
Historical Name:	Aetna Car Garage
Present Name:	Best Parking LLC Company
Architect:	O'Brien Brothers
Site Dimensions:	52.5 ft x 131.25 ft
Struture:	Reinforced Concrete
Zoning:	RC-4 (Residential - Commercial, High Density)
Facade Type:	Arcade

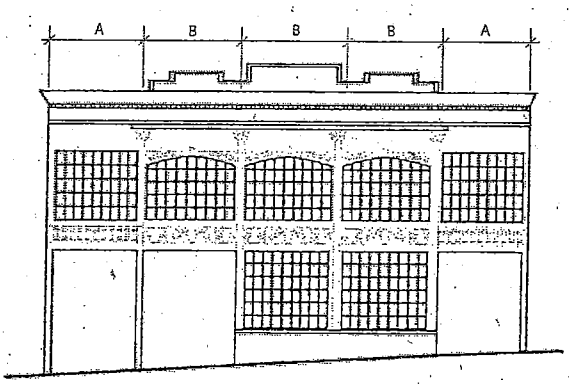
Related Garages



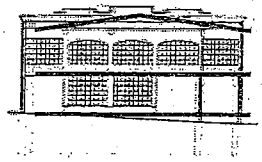
410 Stockton



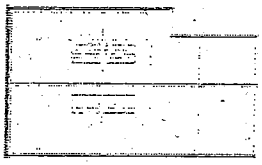
375 O'Farrell



Elevation



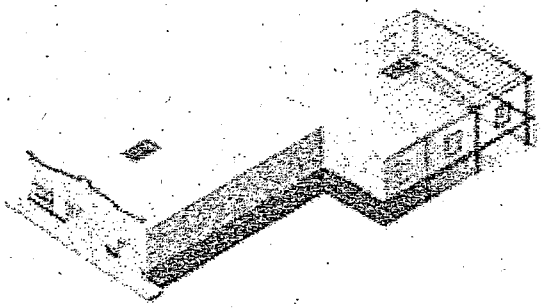
Section



Ground Floor

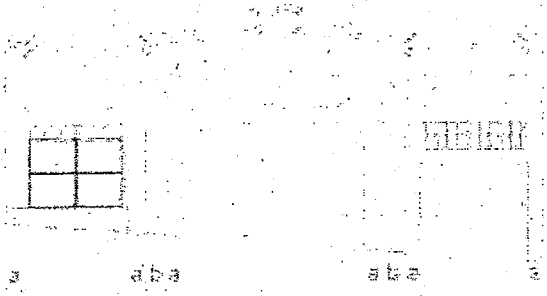
All photos courtesy San Francisco History Center, San Francisco Public Library.

FIGURE A7

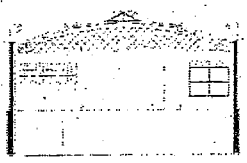


2715 HYDE STREET

Construction Date:	1925
Historical Name:	Vallejo Garage #2
Present Name:	Blazing Saddles Bike Rentals and Tours
Original Builder:	Pasqualetti
Site Dimensions:	52 ft. x 137.5 ft.
Struture:	Concrete
Zoning:	NC-1 Commercial
Facade Type:	Gothic



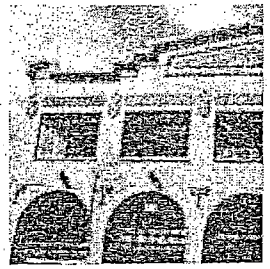
Elevation



Section

Ground Floor

Related Garages



1945 Hyde

1565 Bush

FIGURE A8

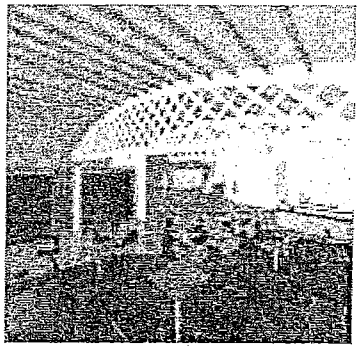
Mark Kessler

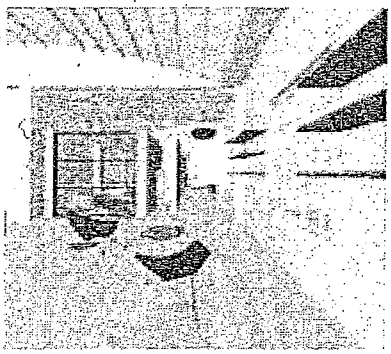
Floor Plan

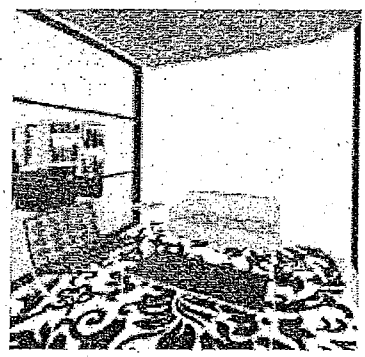
ADAPTIVE REUSE

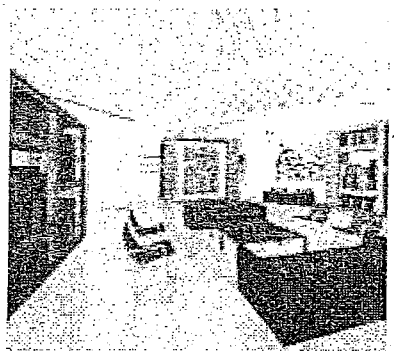
2715 HYDE STREET

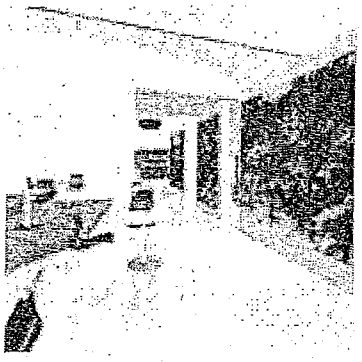
Cafe and Bookstore

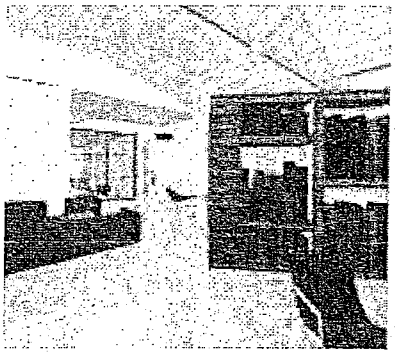






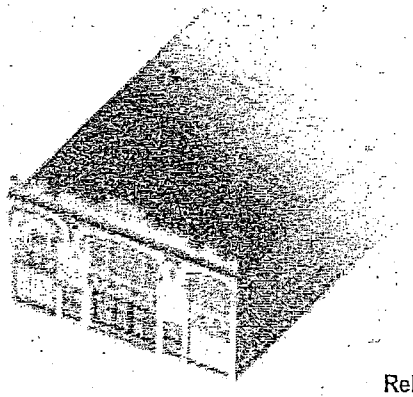






Perspective Views

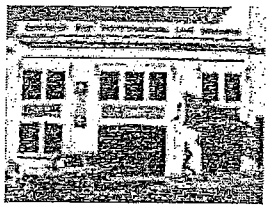
FIGURE A8.1



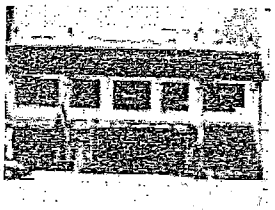
66 PAGE STREET

Construction Date:	1925
Historical Name:	Grand Central Garage
Present Name:	N/A
Architects:	O'Brien Brothers
Site Dimensions:	55 ft. x 121 ft.
Struture:	Concrete
Zoning:	NC-3 (Page Street Neighborhood)
Facade Type:	Gothic

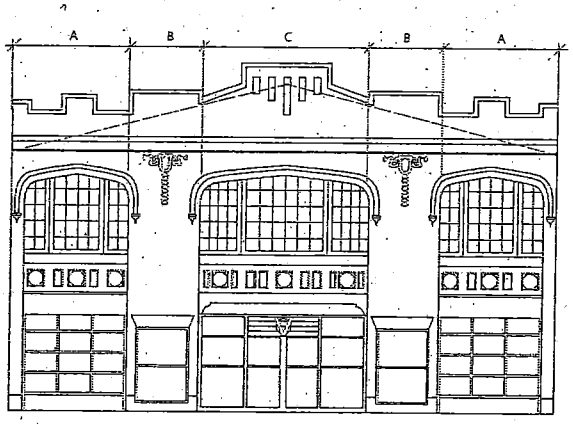
Related Garages



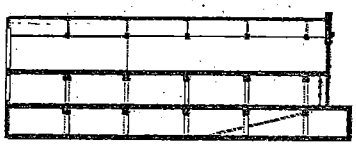
1550 Union



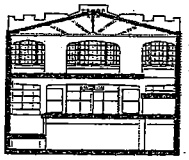
460 Eddy



Elevation



Section

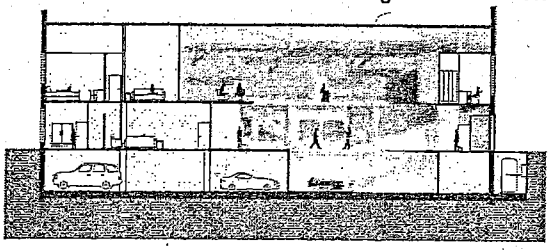


Ground Floor

FIGURE A9

Mark Kessler

Longitudinal Section

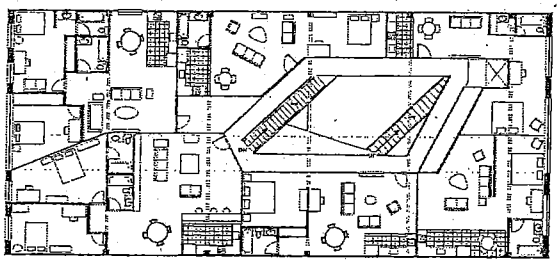


Concept

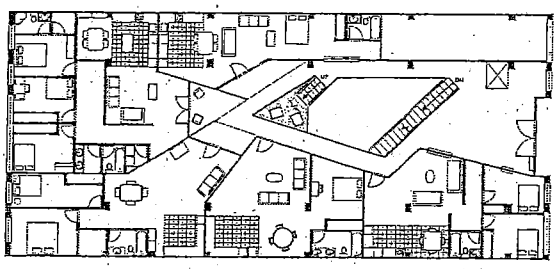
ADAPTIVE REUSE

66 PAGE STREET

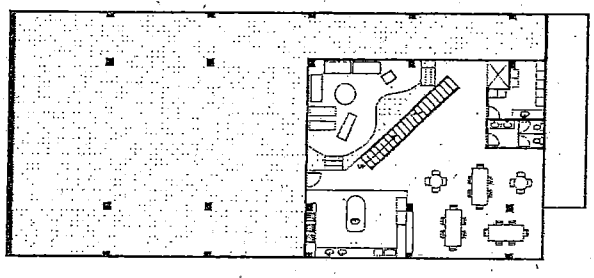
Urban Cohousing Apartment Complex Units



Top Floor

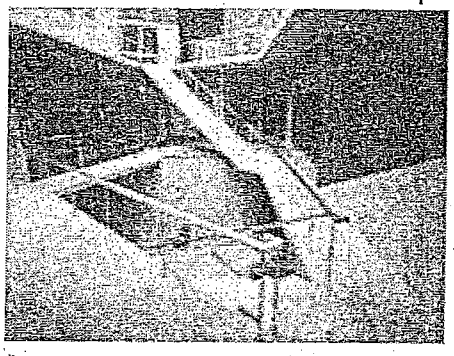


Main Floor



Basement Floor

Perspective Views



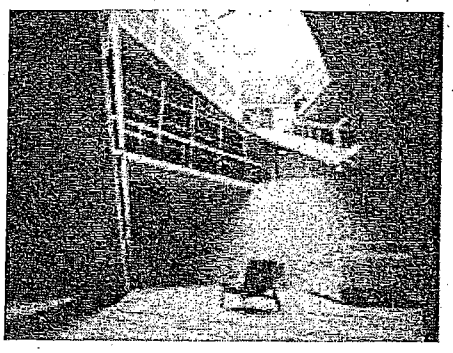
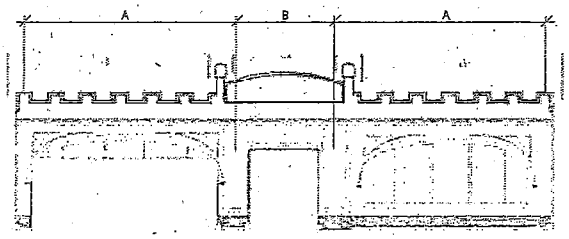


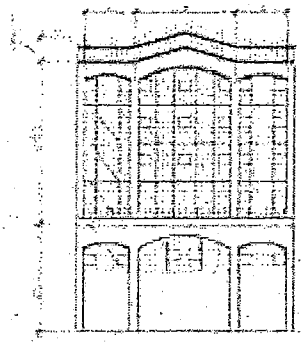
FIGURE A9.1

DEMOLISHED GARAGES

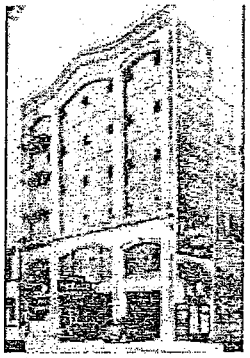


240 Pacific — Pacific Automotive Service

Built: 1920's — Demolished: 1994

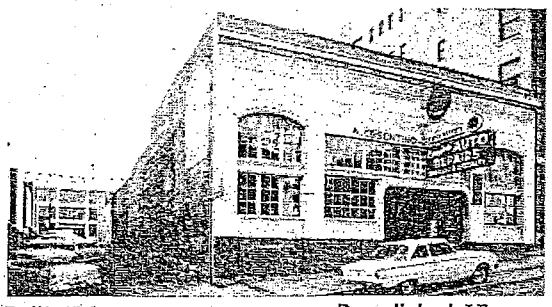


410 Stockton — Bohemian Garage

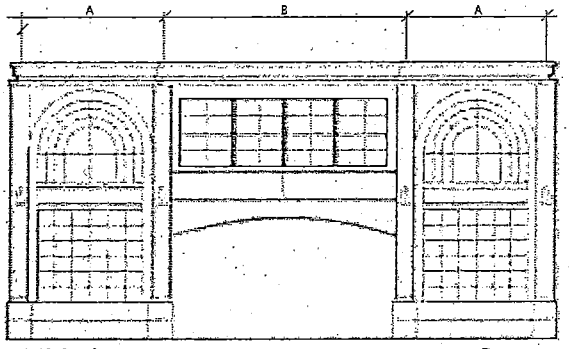


Built: 1923 — Demolished: 1960's

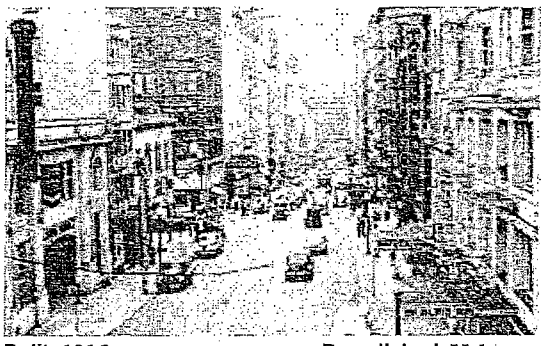
375 O'Farrell — Cunningham Car Distributing Agency



Built: Unkown — Demolished: Uknown



1737 Jackson — Garage



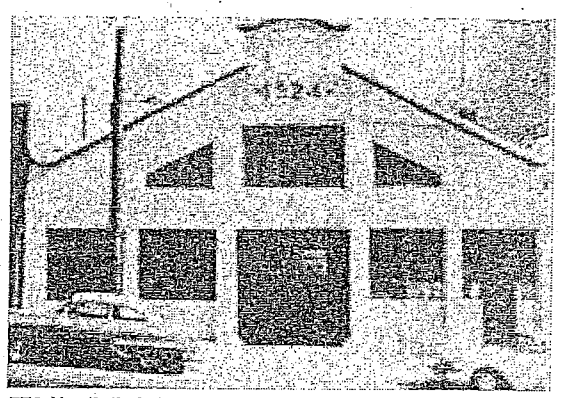
Built: 1915 — Demolished: Unknown

All photos courtesy San Francisco History Center, San Francisco Public Library.

FIGURE A10

Mark Kessler

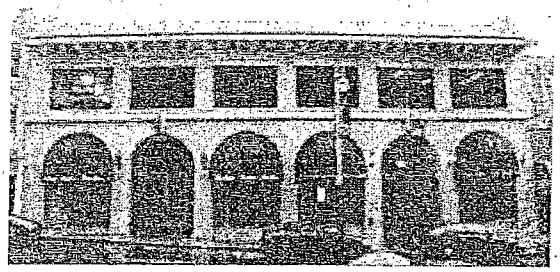
BUILDINGS ADAPTED TO NEW USES



770 North Point Built: 1924
Historical Name: J.G. Barsotti & Co. Automotive Service

Current Name: Patagonia

*750 Post Built: 1913
Historical Name: Post Street Garage



Current Name: John Pence Art Gallery

2120 Polk Current Name: Walgreen's Drug Store

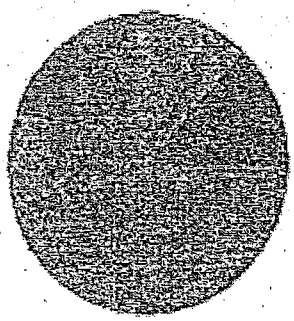
*Photo: San Francisco History Center, San Francisco Public Library

FIGURE A11

EXHIBIT 2-a: Historic Russell Street-Assessment Cluster-Sitex Data Corp

SITEX DATA CORP

% Distribution Sales for Two Years



The Subject Property information report will provide all the information available to us from public records for the address listed above. In addition to any recent sales data and mortgage information, it will include, where available, the physical characteristics of the property.

Information regarding the physical characteristics of a given property, such as living area, year built, bedrooms baths etc., and previous sales information are obtained from public record and reported as is. As such, they will vary in content and completeness from county to county and state to state.

Further, such information has not been verified by this service through site inspection and may be subject to errors due to building additions or deletions or any other changes as well as inaccurate reporting by previous owners, agents or the public agency.

Assessment Cluster

The following are the Tax Assessment for the 15 closest residential properties to the identified subject. The assessed value for each itemized property may or may not be representative of the market value, or have the same tax ratios subject to local tax law.

Proxim.	Address	Last Transaction Date	Assessor Market Values	Assessed Values	Bld/Area	BR/BR/Bth	YB	Lot Area	Pool
0	30-32 RUSSELL ST	07/23/1997		$287,857	1,662	5/5/1	1905	2,395 SF	
.01	60 RUSSELL ST	12/13/2001		$579,424	745	4/1	1908	1,197 SF	
.01	64 RUSSELL ST			$725,000	1,390	6/2	1908	1,197 SF	
.02	29 RUSSELL ST	09/05/1998		$485,159	1,166	6/2/2	1905	1,200 SF	
.02	21 RUSSELL ST	10/29/2001		$470,561	743	4/1	1903	1,200 SF	
.02	43 RUSSELL ST	09/27/2002		$352,695	800	3/1	1907	1,197 SF	
.02	65 RUSSELL ST	02/05/2002		$99,763	743	3/1	1908	1,197 SF	

EXHIBIT 2-b: Historic Russell Street, Assessor Property Records
All homes built between 1906 and 1918 at 30'H

Russell Street contains 17 assessor property records.

15-17 Russell Street San Francisco CA
This 3 bathroom home has 2,700 square feet and was built in 1908.

21 Russell Street San Francisco CA
This 1 bathroom home has 740 square feet and was built in 1906.

29 Russell Street San Francisco CA
This 2 bedroom, 2 bathroom home has 1,166 square feet and was built in 1906.

30-32 Russell Street San Francisco CA
This 6 bedroom, 1 bathroom home has 1,692 square feet and was built in 1906.

37-39 Russell Street San Francisco CA
This 2 bathroom home has 1,424 square feet and was built in 1918.

40-42 Russell Street San Francisco CA
This 2 bathroom home has 1,920 square feet and was built in 1906.

43 Russell Street San Francisco CA
This 1 bathroom home has 800 square feet and was built in 1907.

46-48 Russell Street San Francisco CA
This 2 bathroom home has 1,512 square feet and was built in 1906.

47 Russell Street San Francisco CA
This 2 bathroom home has 2,124 square feet and was built in 1907.

47-49 Russell Street San Francisco CA
This 2 bathroom home has 2,124 square feet and was built in 1907.

51-53 Russell Street San Francisco CA
This 2 bathroom home has 1,400 square feet and was built in 1908.

57-59 Russell Street San Francisco CA
This 2 bathroom home has 1,760 square feet and was built in 1907.

60 Russell Street San Francisco CA
This 1 bathroom home has 745 square feet and was built in 1906.

64 Russell Street San Francisco CA
This 2 bathroom home has 1,350 square feet and was built in 1906.

65 Russell Street San Francisco CA
This 1 bathroom home has 740 square feet and was built in 1908.

69-71 Russell Street San Francisco CA
This 2 bathroom home has 1,800 square feet and was built in 1905.

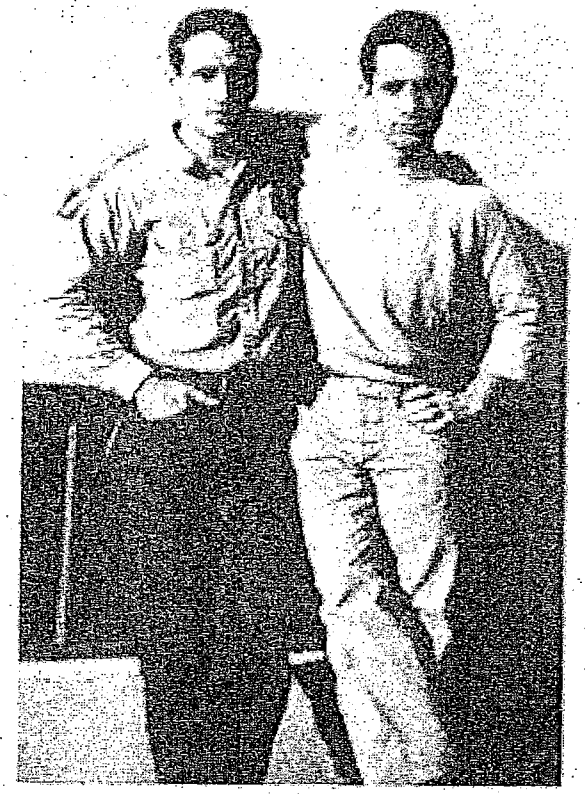
70-72 Russell Street San Francisco CA
This 2 bathroom home has 1,520 square feet and was built in 1916.

from work at the doctor's office and gave us all the sad look of a harassed woman's life. I tried to show the harassed woman that I had no mean intentions concerning her home life by saying hello to her and talking as warmly as I could, but she knew it was a con and maybe one I'd learned from Dean, and only gave a brief smile. In the morning there was a terrible scene: she lay on the bed sobbing, and in the midst of this I suddenly had the need to go to the bathroom, and the only way I could get there was through her room. "Dean, Dean," I cried, "where's the nearest bar?"

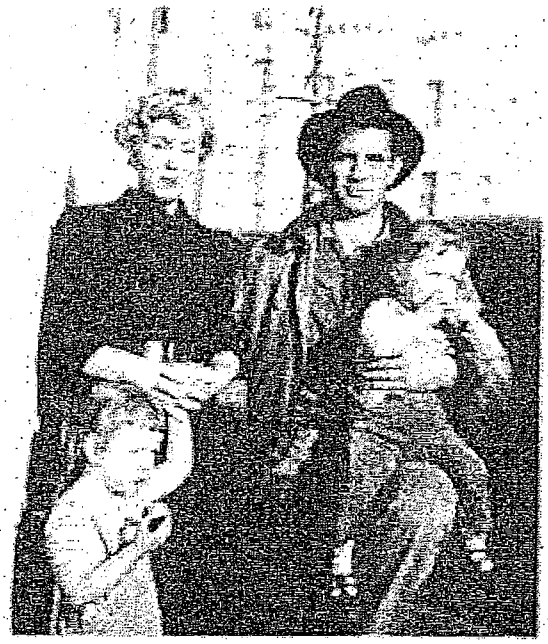
"Bar!" he said, surprised, he was washing his hands in the kitchen sink downstairs. He thought I wanted to get drunk. I told him my dilemma and he said, "Go right ahead, she does that all the time." No, I couldn't do that. I rushed out to look for a bar; I walked uphill and downhill in a vicinity of four blocks on Russian Hill and found nothing but laundromats, cleaners, soda fountains, beauty parlors. I came back to the crooked little house. They were yelling at each other as I slipped through with a feeble smile and locked myself in the bathroom. A few moments later Camille was throwing Dean's things on the living-room floor and telling him to pack. To my amazement I saw a full-length oil painting of Galatea Dunkel over the sofa. I suddenly realized that all these women were spending months of loneliness and womanliness together, chattering about the madness of the men. I heard Dean's maniacal giggle across the house, together with the wails of his baby. The next thing I knew he was gliding around the house like Groucho Marx, with his broken thumb wrapped in a huge white bandage sticking up like a beacon that stands motionless above the frenzy of the waves. Once again I saw his pitiful huge battered trunk with socks and dirty underwear sticking out; he bent over it, throwing in everything he could find. Then he got his suitcase, the bravest witness in the USA. It was made of paper with designs on it to make it look like leather, and hinges of some kind pasted on. A great rip ran down the top; Dean lashed on a rope. Then he grabbed his sealing and threw things into that. I got my bag, stuffed it, and as Camille lay in bed saying, "Liar! Liar! Liar!" we leaped out

Neal Cassady and Jack Kerouac, cover of *On the Road*
seminal novel of the beat movement, written while living at 29 Russell St,
shot on the south facing wall of the
1945 Hyde Street Parking Garage, circa 1948

EXHIBIT 3-b: Significant People



Neal Cassady and Jack Kerouac, circa 1948.
South facing wall of 1945 Hyde Street,
directly across from 29 Russell St., home of Neal and Carolyn Cassady



Carolyn Cassady, her children and Jack Kerouac, circa 1952
standing across from 29 Russell St.
in front of south facing wall of 1945 Hyde Street.
Hyde Street in background.

Neal Cassady, daughter Cathy and Jack Kerouac, circa 1948
in front of south facing wall of 1945 Hyde Street.

Neal Cassady and daughter, circa 1948
in front of south facing wall of 1945 Hyde Street.

EXHIBIT 4: Significant Event,
City and County of San Francisco,
Proclamation for Valencia Garage, March 3, 2007

Proclamation

CITY AND COUNTY OF SAN FRANCISCO

Whereas, *Ed Fong, Hank Nagawa and Ed Tom began working together in the automotive maintenance and repair business 58 years ago; and*

Whereas, *They opened Valencia Auto Service in San Francisco's Mission district in 1963; and*

Whereas, *They moved their business to Hyde Street between Green and Union Streets on Russian Hill in 1967; and*

Whereas, *For the past 40 years, they have been a model neighbor, employer and automotive service provider for their neighborhood, repairing and maintaining countless numbers of automobiles; and*

Whereas, *Valencia Auto Service, recognized for its quality and price, has been rated by the Bay Area Consumers' CheckBook as one of the top 5 auto repair shops in San Francisco; and*

Whereas, *Valencia Auto Service has provided parking spaces in their garage for more than 40 automobiles over the years, thus relieving parking congestion in the neighborhood; and*

Whereas, *After working together for 58 years and providing service to the Russian Hill community for 40 years, Ed Fong, Hank Nagawa and Ed Tom have decided to retire from their business effective April 1, 2007;*

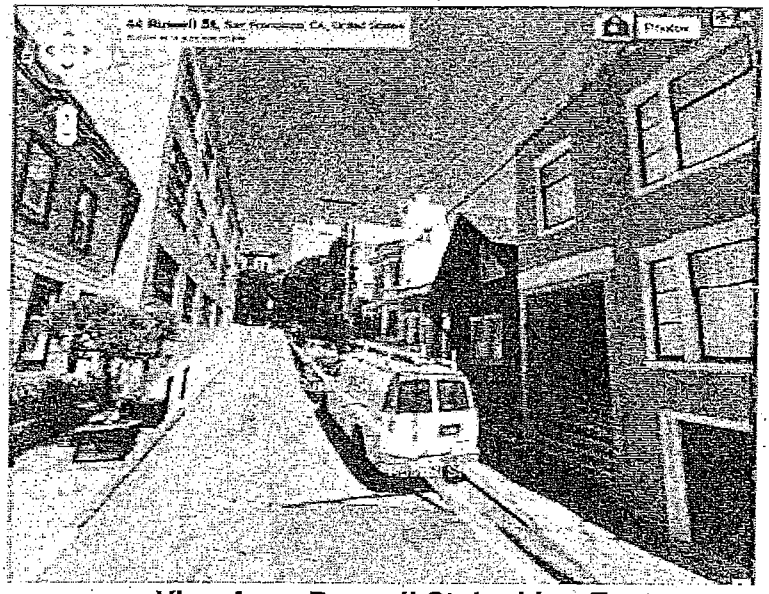
Whereas, *The Russian Hill community expresses its appreciation for the exceptional service that they and Valencia Auto Service have provided to the Russian Hill neighborhood over the years; now, therefore be it*

Resolved, *That the San Francisco Board of extends its highest commendation to Ed Fong, Hank Nagawa and Ed Tom, and best wishes for a well-earned retirement.*

Aaron Peskin, President
San Francisco Board of Supervisors
March 13, 2007

EXHIBIT 5-a: Significant Impact, Russell Street

View from Russell St., south wall, looking North



View from Russell St. looking East

EXHIBIT 5-b: Significant Impact, Russell Street, looking West

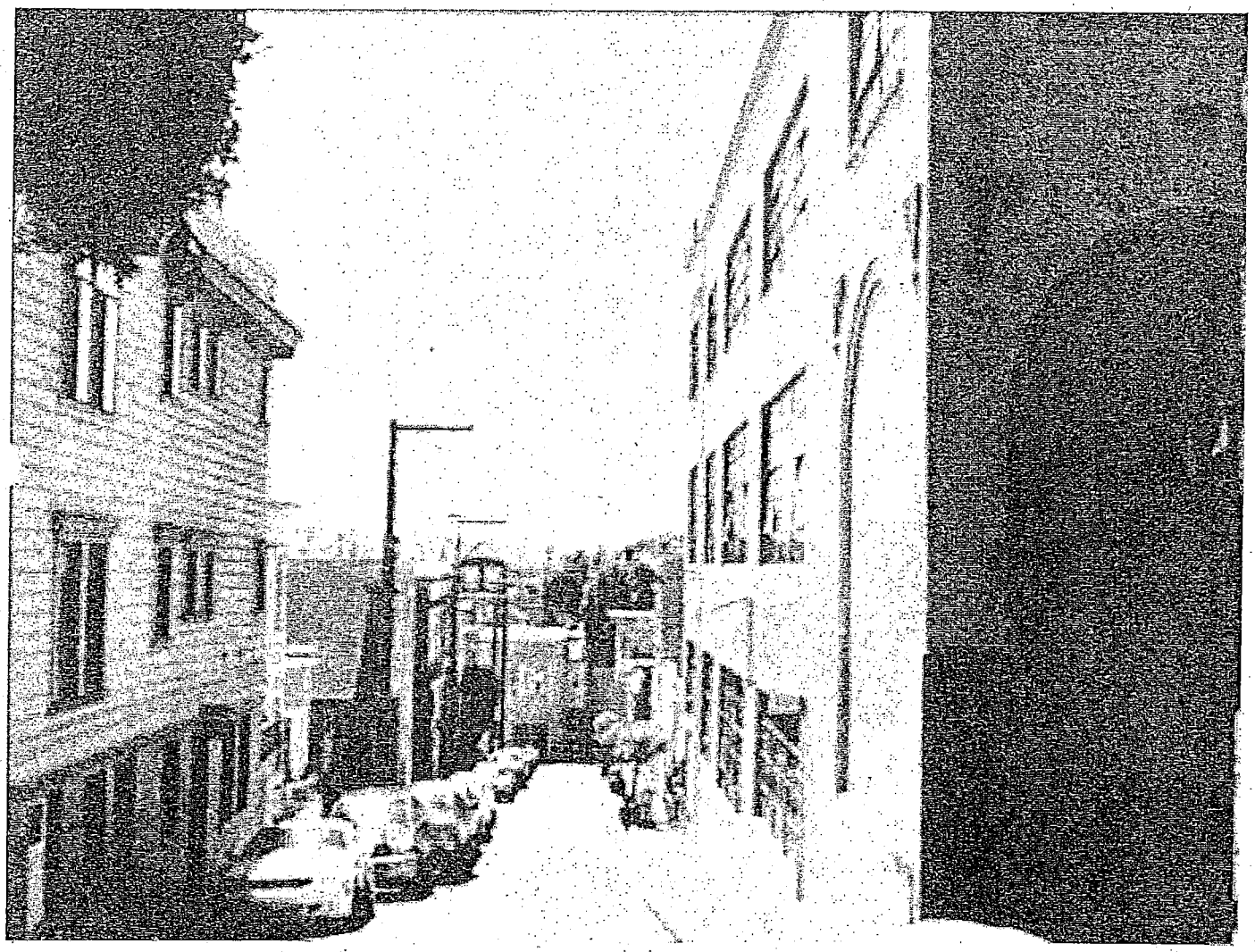


EXHIBIT 5-c: Significant Impact, Russell Street and neighborhood, top view looking West

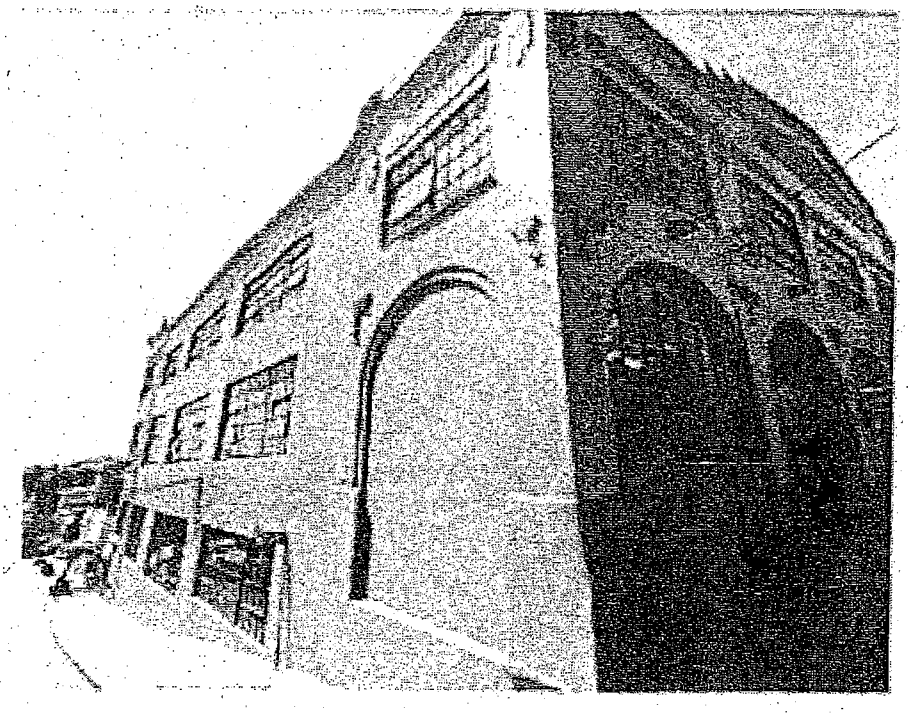


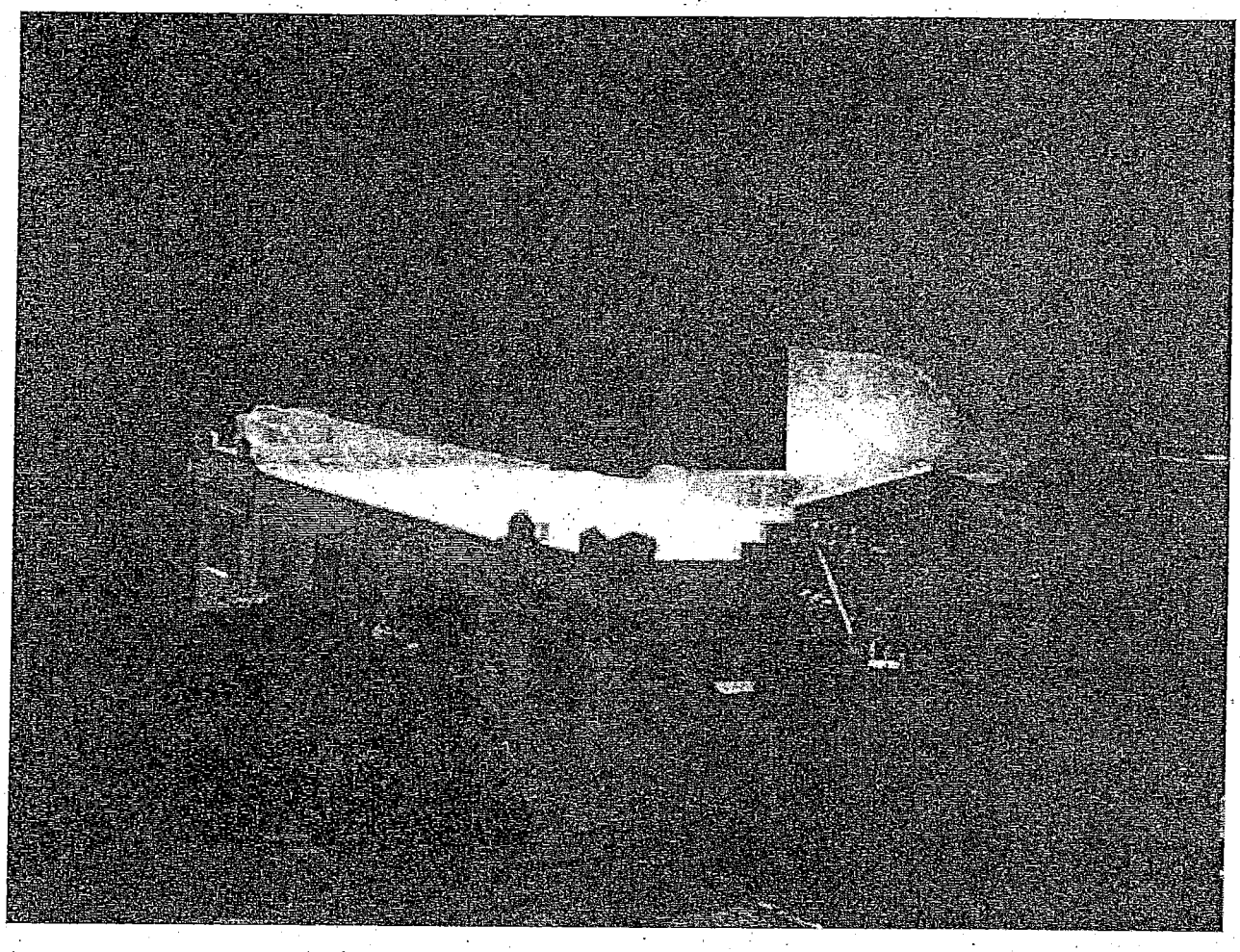
EXHIBIT 5-d: Significant Impact, Union Street, Stairwell and Mechanical Penthouse

Current view looking [illegible]

Mechanical penthouse as per current plans 40'0 x [illegible]

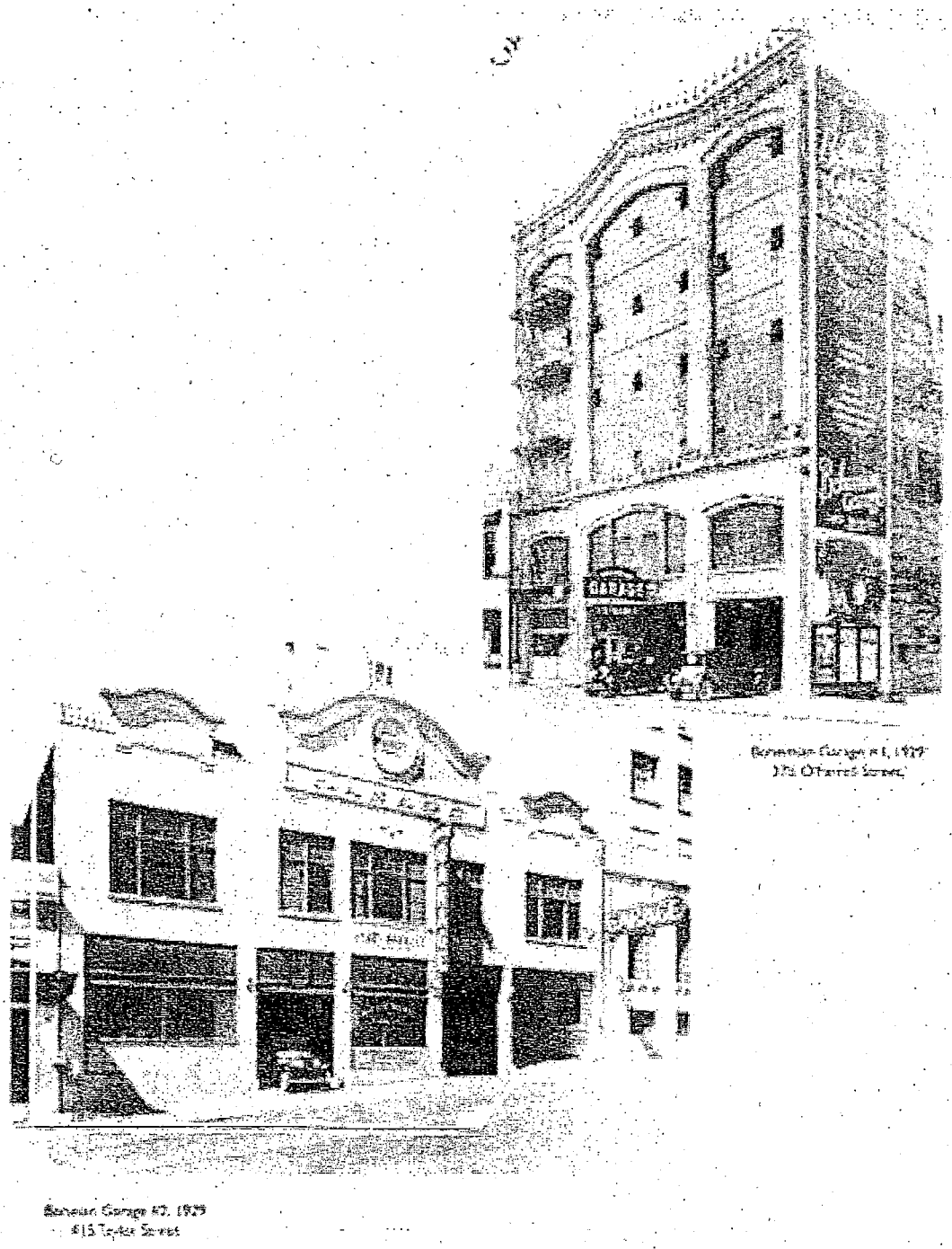
Night time (rendering) based on current use plans, treated glass soundbarrier and on top

EXHIBIT 5-e: Significant Impact, Russell Street,
Stairwell and Mechanical Penthouse,
south facing side, view looking north



Night –time (rendering) based on current plans of mechanical penthouse, and stairwell, frosted glass onsouth-facing wall (40'L) and on top (13'9"W x 10'H), view looking north. Not shown, roof deck (appx 650 sq ft) and lights for roof deck.

EXHIBIT 6-a: Historical Significance, San Francisco Parking Garages
S.F. parking garages part of the current, "House of Cars," exhibit,
at the National Building Museum, Washington D.C.



Display Ad 23 -- No Title
[illegible]

ASSOCIATED Gasoline

The following dealers in San Francisco sell Associated Gasoline, because motor car owners know its high quality and prefer to use it. They are identified by an Associated Oil Company Sign.

ACME GARAGE .... [illegible]
AMERICAN GARAGE .... [illegible]
BEALE ST. GARAGE .... [illegible]
BEE GARAGE .... [illegible]
BELCHER ST. GARAGE .... [illegible]
BOULEVARD GARAGE .... [illegible]
CABLE GARAGE .... [illegible]
CALIFORNIA GARAGE .... [illegible]
CASTRO ST. GARAGE .... [illegible]
CENTURY GARAGE .... [illegible]
CLASS A GARAGE .... [illegible]
CLEMENT GARAGE .... [illegible]
COLE ST. GARAGE .... [illegible]
COLISEUM GARAGE .... [illegible]
CRESCENT GARAGE .... [illegible]
HAMILTON SQUARE GARAGE .... Geary & Steiner Sts.
HERALD GARAGE .... [illegible]
HIGHWAY GARAGE .... [illegible]
HOTTUA BROS. GARAGE .... [illegible]
HOYLE'S GARAGE .... Hyde & Russell Sts.
HUB GARAGE .... [illegible]
HUDSON GARAGE .... [illegible]
HUGHSON, W. L., GARAGE .... [illegible]
INDEPENDENT OIL CO. .... [illegible]
JUNCTION GARAGE .... [illegible]
KEYSTONE GARAGE .... [illegible]
KRUGER'S GARAGE .... [illegible]
LIBERTY GARAGE .... [illegible]
REPUBLIC GARAGE .... Geary & Third Ave.
RICHMOND GARAGE .... [illegible]
ROGERS GARAGE .... [illegible]
ROYAL GARAGE .... [illegible]
SACRAMENTO GARAGE .... [illegible]
SENATORS' GARAGE .... [illegible]
SEQUOIA GARAGE .... [illegible]
ST. FRANCIS GARAGE .... [illegible]
STOCKTON & SUTTER GARAGE .... [illegible]
S. & M. GARAGE .... [illegible]
SUPERIOR GARAGE .... [illegible]
SWEENY, W. J., GARAGE .... [illegible]

Attachment D: Russian Hill Community Association (RCHA) Submittal to Planning Department "Summary of Potential Environmental Impacts of Project Requiring an EIR," August 9, 2010

Russian Hill Community Association

18 Delgado Place San Francisco, CA 94109 415-776-2014

1945 Hyde Street Project
Russian Hill's Community Parking Facility
Summary of Potential Environmental Impacts Requiring an EIR

Project Background

Proposed Project. On May 17, 2010, Building Application No. 2010.05.0162 was submitted to construct a 5,330 square foot fourth floor addition to the three story building located at 1945 Hyde Street and convert the nearly century old historic use of this 58 space community parking facility to residential use – resulting in a 25,069 square foot four story building to include 7 high-end condominiums, 15 off-street parking spaces for the condominiums, and 860 square feet of commercial space.

Environmental Issues and Application. An Environmental Evaluation Application dated March 9, 2010 was submitted by the project sponsor. The application included: 1) Historic Resource Evaluation Report dated February 10, 2010 evaluating the structure built in 1920 as a historic resource, and 2) Phase I Environmental Site Assessment dated March 5, 2009 pertaining to the past storage of 2,000 gallon underground storage tanks and the possible disturbance during demolition of suspected asbestos containing materials in the building.

Need for Initial Study. This documentation of the historic resource designation of this 90 year old structure and the project site's past exposure to hazardous materials, in addition to CEQA's requirements for public participation (CEQA Guidelines Section 15083 and 15087), CEQA requires that an "Initial Study" (CEQA Guidelines Section 15063) be prepared by the Planning Department because of the significance of the proposed project's potential environmental effects and the need for public transparency. During the preparation of the "Initial Study," the public – especially the nearby property owners, residents, businesses and community organizations – will have the opportunity under CEQA to communicate concerns about and identify potential environmental effects of the proposed project.

Initial Public Comment. On June 10, 2010, the Major Environmental Analysis section of the Planning Department issued the "Notification of Project Receiving Environmental Review" inviting the public to identify potential environmental effects about the proposed project and communicate their concerns.

On July 8, 2010, the Russian Hill Community Association (RHCA) submitted a 69 page report, "Response to Notice of Project Receiving Environmental Review," identifying numerous potential significant environmental effects of the proposed project to be analyzed for their significance during the preparation of the "Initial Study" of this proposed project.

EIR or Negative Declaration. Upon the completion of the "Initial Study," the Planning Department will determine whether the identified potential environmental impacts are significant enough to require the preparation of an Environmental Impact Report under CEQA for the proposed project or whether to issue a Preliminary Negative Declaration for this project.

Impact Summary—Need an EIR. In order to facilitate the expeditious review and analysis of the many potentially significant environmental impacts identified in the RHCA Response, this "Summary of Potential Environmental Impacts of Project Requiring an EIR," was prepared to highlight them. **From this review, it is clear that the proposed project's numerous significant potential environmental impacts require preparation of an Environmental Impact Report under CEQA.**

Summary of Potential Project Impacts That Require an EIR

CEQA requires the preparation of an EIR when (1) routine mitigation measures cannot obviously reduce a proposed project's potentially significant environmental impacts to a less than significant level and the project sponsor agrees to incorporate those measures into the project in the Mitigated Negative Declaration, and (2) when a project is controversial (CEQA Guidelines Sections 15064 and 15070). The proposed project is controversial with the public and would have significant impacts that routine measures would not mitigate. In addition, the proposed project may have some impacts that measures will not be able to reduce to less than significant. For these reasons, the proposed project requires an EIR.

This Summary also identifies some related socioeconomic CEQA impacts and planning issues that the EIR should address. The San Francisco Planning Department considers these issues important in its current planning policy and project decisions. In the interests of good planning, CEQA does not prohibit an EIR from addressing related planning issues in an EIR. Doing so in the EIR is good planning for three reasons. First, the issues and options assessment occurs early in the planning process when changes can be made easily at low or no cost. Second, planning and environmental issues are often interrelated, therefore addressing them together is essential, efficient, and effective. Third, it allows development and consideration of planning alternatives to resolve related planning issues in addition to an EIR's traditional environmental alternatives analysis that focuses exclusively on significant environmental impact reduction through project redesign.

A. Key Potentially Significant Environmental Impacts Requiring an EIR

1. **The proposed land use change from the property's character-defining, 90-year historic use as a community parking facility to a modern residential use would be an unavoidable significant impact and require preparation of an EIR.** The building's existing historical land use associates it with the first criterion for listing on the California Register: important historical events, namely (1) association with a component of the early period of automotive transportation system development in San Francisco—the 1920s-era parking garage—and (2) association with the earthquake reconstruction period building on and around Russell street. These associations makes the building a potential contributor to both a potential discontiguous 1920-Era Parking Garage Historic District and a potential Russell Street Reconstruction Period Historical District. The Historical Resource Evaluation Report attached to the Environmental Evaluation Application misses this point and the authors must include it to correct the report.

2. **The proposed land use change would have a significant and unavoidable off-site impact on two potential historic districts** (see A.1, above) because of the property's potential to be a contributor building to those districts.

3. **The proposed land use change would be an unavoidable considerable contribution to the potentially significant and unavoidable cumulative impact on 1920-era parking garages citywide because of the project's significant and unavoidable off-site impact on the potential discontiguous 1920-Era Parking Garage Historic District.** This cumulative impact arises from the historic loss to date of about half of the approximately 300 1920-era garages in San Francisco and the absence of a formal discontiguous 1920-era parking garage historic district to protect against the continued loss of these precious historic neighborhood community land uses and resources citywide.

B. Other Important Potentially Significant Environmental Impacts Requiring an EIR

1. **Land use character and neighborhood impacts** on Russell Street, the quiet mid-block alley street (one of San Francisco's neighborhood treasurers) and surrounding neighborhood.

2. **Excessive urban design mass effects from adding a new fourth floor to an existing overly massive structure** set amidst a residential neighborhood with much finer-grained lot patterns and buildings, and the associated issue of establishing the correct significance criteria for massing impacts when an existing structure's mass is already excessive (e.g., zero additional mass).

3. **Aesthetic view impacts** from the 360 degrees of project visibility.

4. **Aesthetic light and glare issues** from new 24/7 residential uses behind large industrial windows facing Russell Street and the rooftop appurtenances, the glass stairway penthouse in particular.

5. **Urban design and livability impacts on Russell Street,** a mid-block alley street and one of San Francisco's neighborhood treasurers.

6. **Dangerous circulation design impacts** created by the proposed parking ingress and egress on Russell Street.

7. **Dangerous neighborhood construction congestion and hazard impacts** created by construction and staging.

8. **Hazardous and toxic material impacts** at the project site identified in the Phase I Environmental Assessment (attached to the Environmental Evaluation Application). [The EIR should evaluate the Phase 1's completeness and accuracy of potential hazardous materials – gasoline storage tanks, asbestos, etc. – which were or are present at the project site.]

9. **Construction noise impacts persisting at unacceptable levels** above ambient noise levels and General Plan and commonly accepted standards after required compliance with the City's Noise Ordinance.

C. Environmental and Planning Impacts Requiring Examination in an EIR

In addition to the proposed project's potentially significant impacts that require—under CEQA—preparation of an EIR (summarized above), there are a set of unusual potential environmental impacts associated with the change in land use itself that are not necessarily apparent upon first examination. Some of these issues—affordable housing and job loss--are social and economic effects that fall under the purview of CEQA. However, they are also important citywide planning policy and political issues, including the sufficiency of neighborhood parking. CEQA does not prohibit planning related issues to be examined in EIRs because this is often the appropriate, efficient, and effective point in the planning process for such examination. Thus, these issues are discussed below for inclusion in the EIR.

1. **Significant cumulative adverse environmental impact on the Russian Hill community of the conversion of the use of this 90 year historic community parking facility to residential use** and the elimination of the 58 off-street parking capacity provided by this community parking facility. This change would have the following effects.

a. **Exacerbate the already critical scarcity of on-street parking** on Russian Hill by producing such a significant potential cumulative environmental impact to require under CEQA the preparation of an EIR to assess the increased number of cars searching for these critically limited on-street parking spaces and to assess the increased traffic congestion and associated air pollution caused by cars circulating searching for parking spaces.

b. **Create a significant cumulative adverse environmental impact due to the many disruptive construction projects** that would be initiated by homeowners and owners of apartment buildings on Russian Hill to construct garage additions to their residential buildings which lack garage facilities in order to replace the off-street parking spaces that presently are provided by this 58 space community parking facility.

c. **Diminish the affordability of the housing on Russian Hill** caused by the increase in the prices of those houses and apartment buildings to which additional garages would be constructed so to recoup the cost of construction of these additional garages to these residential buildings which presently lack garage facilities.

2. **Establish a precedent inducing the citywide significant cumulative adverse environmental impact on neighborhoods throughout San Francisco through the potential conversion to residential use of dozens of community parking facilities located in San Francisco neighborhoods, and accordingly having the following effects.**

a. **Exacerbate the scarcity of on-street parking** in those neighborhoods creating a significant potential cumulative adverse environmental impact requiring under CEQA the preparation of an EIR to assess the increased number of cars searching for on street parking spaces and the increased traffic congestion and associated air pollution caused by cars circulating searching for parking spaces in those neighborhoods.

b. **Cause the cumulative environmental impact of the many disruptive construction projects** initiated by homeowners and owners of apartment buildings in those neighborhoods to construct garage additions to replace the off-street parking spaces provided by the community parking facilities located in those neighborhoods..

c. **Diminish the affordability of the housing in neighborhoods throughout San Francisco** caused by the inflation of the prices of those houses and apartment buildings to which additional garages would be constructed requiring higher housing prices in order to recoup the cost of construction of these additional garages.

3. **Potential significant adverse environmental impact in the commercial district** by depriving destination restaurants and retail stores parking for their clients in the community parking facility and thereby cause traffic congestion and associated air pollution throughout the residential community as their customers circulate their cars searching for parking spaces and causing estimated business volume to decrease as much as 33% resulting in the layoff of many employees and some bankruptcies.

Attachment E: Russian Hill Community Association (RCHA) Submittal to Planning Department "Addendum to Response to Notice of Project Receiving Environmental Review," January 26, 2011

Russian Hill Community Association

18 Delgado Place San Francisco, CA 94109 415-776-2014

January 26, 2011

Ms. Chelsea Fordham, Environmental Planner
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: 1945 Hyde Street Case No. 2010.0162E
Proposed Conversion of Community Parking Facility to Residential Use
Addendum to RHCA Response to "Notice of Project Receiving Environmental Review"

Dear Ms. Fordham:

This Addendum supplements the Russian Hill Community Association's "Response to Notice of Project Receiving Environmental Review" (NOP) submitted on July 8, 2010 and the "Summary of Potential Environmental Impacts of Project Requiring an Environmental Impact Report (EIR) " submitted on August 9, 2010. At that time, we noted that additional information would be forthcoming and you confirmed that all additional information would be considered.

On December 1, 2010, the Russian Hill Community Association advised you by email that an Addendum to the RHCA Response to the "Notice of Project Receiving Environmental Review," (NOP) would follow. As we discussed on January 18, 2011, the Russian Hill Community Association submitted an Addendum to Response to NOP via email on January 13, 2011, which was bounced back from the sfgov.org server. You advised us that the Environmental Review had not been completed and you would welcome additional input from the RHCA.

This "Addendum to the RHCA Response to NOP" stresses and elaborates on four significant potential environmental impacts that clearly demonstrate under state law of the California Environmental Quality Act, (CEQA,) that an Environmental Impact Report (EIR) must be prepared for the proposed construction project. A summary of four significant impacts of the proposed construction project at 1945 Hyde Street are listed below, followed by descriptions of each key point:

- **Inaccuracies, omissions, and disputed findings of the Historical Resource Evaluation.**
- **Proposed project's change in existing historical land use from neighborhood parking to residential condominiums, resulting in a range of significant impacts for which there are no routine mitigation measures. Some significant impacts would be unavoidable.**
- **Change in use will reduce neighborhood mixed uses, thereby reducing neighborhood livability, resiliency, and adaptability. In particular, it will foreclose the extension of a 20th century community parking facility that is part of a larger neighborhood network of adapted 1920s-era garages, into a 21st century parking facility for electric vehicle parking/ solar recharging/car-bike-share,/and bike parking —a key component of the City's emerging sustainable transportation infrastructure. The preservation of the existing use is the greenest alternative.**
- **Substantial community controversy, concern and opposition.**

1. **Historical Resource Evaluation of Kelley and VerPlanck is Incorrect: EIR Required.**

University of California-Davis Professor Mark Kessler, AIA, authored a study on San Francisco's 1920-era parking garages. This study was included in the RHCA's July 8, 2010 "Response." Professor Kessler is writing a book on San Francisco's community parking facilities. He advised the Russian Hill Community Association in a letter dated December 13, 2010 that (emphasis added) :

> **"The assertion that 'the subject building would not contribute to this [Russell Street] district due to dissimilarities of scale, materials, form and building type' (p19) may not be supportable.** Earlier in the Evaluation, the authors acknowledge that the building is contextual: 'Although not a classical design similar to the surrounding Classical Revival apartment buildings; the building still exhibits an order and symmetry intended to blend well with the existing buildings.' (p 18) In addition there are also other garages of this era in the neighborhood. Even if there were not, I suspect that a building of this quality would not be listed as non-contributing on the basis of the criteria cited. **For example, the State Garage at 818 Leavenworth is listed as a contributing building to the Lower Nob Hill Apartment Hotel District even though it does not conform to the predominant use, scale, etc.**
>
> **I also do not agree with the Evaluation's conclusion that the proposed project complies with Standard 1 of the Secretary of the Interior's Standards.** The Standard states: 'A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.' (p22) While I have not had the opportunity to review the architectural drawings, I believe that **a conversion to condominium use would necessarily constitute a significant change to the spaces and/or spatial relationships.**
>
> **Similarly, with respect to Standard 2, I believe that the original use is strongly related to historic character. In this case, that character is industrial. The conversion to condominiums alters the character of the building, even, even if the architecture is maintained.**
>
> My sincere belief is that **the ... project does compromise the significance of the building.**

The full text of Professor Kessler's December 13, 2010 letter is included as Attachment #1.

2. **The Change in the Proposed Land Use and Associated Elimination of Facility's Industrial Character is a Significant Impact Without Mitigation: EIR Required.**

Section 15301of Article 19 of the California Environmental Quality Act dealing with Categorical Exemptions, in its definition of Class 1, states that "The key consideration is whether the project involves negligible or no expansion of an existing use."

The proposed project results in the elimination of the existing facility's industrial character, the elimination of its existing use, a substantial expansion of the existing use by filling in the parking floors with residential units and a substantial expansion of the structure by the addition of a fourth story that requires a variance. Not only would the proposed project be a substantial expansion and intensification of the existing building, but it does not retain the building's existing use of historic community parking. These four project characteristics generate impacts that exceed significance thresholds for land use, aesthetics, and historical resources. Therefore, because these impacts would be significant and would not have routine mitigation measures to reduce them to less than significant, CEQA requires that an EIR be prepared to fully evaluate and mitigate them.

3. **The Proposed Project Reduces San Francisco's Strategic Sustainability Options: EIR Required**
The proposed project's land use change from a community parking facility to condominiums would cause undesirable parking impacts and crowding in the neighborhood, indirectly increase housing costs through pressure to add garages, and foreclose meeting the community transportation-storage-and-renewable-energy-recharge-facility needs of the sustainable, 21st century, San Francisco.

- Given the fundamentally inadequate supply of on-street parking in the Russian Hill community, the elimination of the existing 58 off-street public parking spaces currently provided in the 1945 Hyde Street structure would result in a cluttered visual effect in the neighborhood streetscape, which would be significant and constitutes a significant adverse aesthetic impact under CEQA.
- The proposed project would dramatically increase the cost of housing in the Russian Hill community as owners of residences and apartment buildings without garages would be forced to construct garage additions to their buildings in order to provide off-street parking for their automobiles. The cost of constructing these additional garages would increase the cost of housing on Russian Hill, needlessly inflating housing prices and making housing less affordable.
- In addition, the elimination of the community parking facility would conflict with the sustainability goals of the Transportation Element or the General Plan:

> **POLICY 14.5**
> Encourage the use of alternative fuels for City vehicles, transit vehicles and as feasible, any other motor vehicles as a means of reducing toxic automobile emissions and conserving energy.
>
> **POLICY 28.2**
> Provide secure bicycle parking at existing city buildings and facilities and encourage it in existing commercial and residential buildings.

Because the land use change would also foreclose the evolution of new forms of parking, uses to meet future neighborhood transportation needs, the proposed project's land use change would be an irreversible and irreplaceable neighborhood impact that would reduce livability, adaptability, and resiliency.

The RHCA's 1945 Hyde Street Project Team, under the guidance of Project Team member and sustainability planner Scott Edmondson, AICP, has studied the status of and potential for the 1920s-era parking facilities in the City. The Russian Hill Community Parking Facility at 1945 Hyde Street was one of the first of 300 community parking facilities constructed during the past century in neighborhoods throughout San Francisco to provide off street parking for the homes and apartment buildings which were constructed without parking facilities after the 1906 earthquake. The facility at 1945 Hyde Street is one neighborhood garage of a larger citywide network of unprotected 1920s-era historic garages. Approximately 150 garages of the original 300 are still in existence.

CEQA Section 15300 deals with exceptions to Categorical Exemptions for projects in classes other than Class 1 projects which is the class 1945 Hyde Street is assigned. However, Section 15300. 2(b) regarding "cumulative impact" of projects could apply to the proposed project since the rationale is similar, i.e. "All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant." The community parking facility at 1645 Pacific is just the most recent 1920s-era community parking facility to be lost to development. As a result, other community parking facilities in San Francisco are at risk of being lost to future development projects. There is a potential

cumulative impact in the loss of remaining 1920 era community parking facilities that needs be acknowledged and addressed.

- Most importantly, the elimination of the community parking facility at 1945 Hyde Street would deprive the City of the option of extending into the future the industrial auto-related use of 1945 Hyde. When one contemplates the possible value that this unique citywide parking asset could play in the future sustainable San Francisco, such as creating a neighborhood network of future electric vehicle parking/solar recharging/car-bike-share,/and bike parking facilities, the larger community value and risk embedded in and illuminated by the 1945 Hyde Street Project becomes clear. The value of this point is underlined now by the Department of Environment, which, in cooperation with federal initiatives to support the market transition to electric vehicles by providing the charging station infrastructural requirements, is already seeking locations and installing such charging stations.

The fact is that the use change, historic or not, irreplaceably reduces part of the mix of uses the neighborhood needs for livability, resilience, maintenance of its current aesthetic character, and adaptability for future conditions, particularly those of a sustainable San Francisco. In this respect, the change of use proposed by the 1945 Hyde Street construction project would be a significant and unavoidable environmental neighborhood impact under CEQA and would require an EIR. Attachment #2 addresses this issue in connection with the City's transit first policy in further detail.

4. **Public Concern and Extensive Controversy Demonstrated at Community Meeting. EIR Required.**

On November 10, 2010 the RHCA hosted a neighborhood meeting with standing room only attendance of over 100 people concerned about the proposed project for the Russian Hill Community Parking Facility at 1945 Hyde Street and other similar projects.

Concerns focused immediately on the displacement of 58 existing off-street parkers and the dire effects perceived over increased on-street parking congestion in the Russian Hill area. Historically there has been an extreme scarcity of on-street parking spaces on Russian Hill. This is demonstrated by the fact that Russian Hill is home to the inaugural Neighborhood Parking (Sticker A) program instituted more than 30 years ago because residential densities and intense on-street parking congestion were and are legendary. A Google Earth survey of the 3 block radius surrounding 1945 Hyde Street indicates there currently are 125+/- on-street parking places available and used, (see Attachment #3) Adding displaced parkers to the residential streets would increase on street parking demand by an untenable 48%. The number of new garage additions to homes on Russian Hill has increased. The RHCA is tracking the number of applications for permits to construct garages because of the closure of 1945 Hyde Street, anticipating a significant loss in available on-street parking places for the public.

Speaking at the Community Meeting, Professor Kessler strongly emphasized his position on the San Francisco's unprotected 1920s-era community parking garages: the existing neighborhood parking use is an essential defining feature of the historic character of 1945 Hyde Street and other facilities, and the historic use must be retained to maintain the historic integrity of the building. Representatives of the RHCA's 1945 Hyde Street Project Team presented information on the need for strategic transportation planning and consideration of the opportunity cost of a change in use decision.

In conclusion, because of the outstanding public controversy regarding the proposed construction project at 1945 Hyde Street and the many unusual, non-routine and insufficiently examined environmental, legal, historic,

neighborhood and planning issues surrounding the project, the valid implementation of the California Environmental Quality Act requires that an Environmental Impact Report be prepared for the proposed construction project.

We trust this "Addendum to the NOP" and the attachments, in addition to our previous submittals facilitate your Environmental Review of the proposed project and ensure that the proposed project is implemented in compliance with CEQA.

If you have any questions, do not hesitate to email me at **jcherry@rhcasf.com**.

Sincerely,

Jamie Cherry

Jamie Cherry, Chair
RHCA 1945 Hyde Street Project Team

Attachment: #1 Letter dated December 13, 2010 from Mark Kessler, AIA, to Jamie Cherry, RHCA
#2 Assessment of Unique Issues Involved in Project by RHCA Project Team
#3 Google Earth view of parking spots within vicinity of 1945

Cc: Mr. Rick Crawford, Planner, Northeast Team, San Francisco Planning Department
Mr. Moses Corrette, Historic Planner, San Francisco Planning Department
Honorable David Chiu, President, San Francisco Board of Supervisors

ATTACHMENT #1 to ADDENDUM TO RESPONSE TO NOP

Mark Kessler, AIA
1155 Leavenworth St. #15 San Francisco, CA 94109

December 13, 2010

Ms. Jamie Cherry
Chair, 1945 Hyde Street Project Team
Russian Hill Community Association
18 Delgado Place
San Francisco, CA 94109

Dear Ms. Cherry:

As your project team requested, I have reviewed the Historical Resource Evaluation for 1945 Hyde Street prepared by Kelley and VerPlanck.

I do not concur with the Evaluation's conclusion that 1945 Hyde Street would not qualify as a contributing building to a potential historic district.

The assertion that "the subject building would not contribute to this district due to dissimilarities of scale, materials, form and building type" (p19) may not be supportable. Earlier in the Evaluation, the authors acknowledge that the building is contextual: "Although not a classical design similar to the surrounding Classical Revival apartment buildings; the building still exhibits an order and symmetry intended to blend well with the existing buildings." (p18) In addition, there are also other garages of this era in the neighborhood. Even if there were not, I suspect that a building of this quality would not be listed as non-contributing on the basis of the criteria cited. For example, the State Garage at 818 Leavenworth is listed as a contributing building to the Lower Nob Hill Apartment Hotel District even though it does not conform to the predominant use, scale, etc.

I also do not agree with the Evaluation's conclusion that the proposed project complies with Standard 1 of the Secretary of the Interior's Standards. The Standard states: "A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships." (p22) While I have not had the opportunity to review the architectural drawings, I believe that a conversion to condominium use would necessarily constitute a significant change to the spaces and/or spatial relationships.

Similarly, with respect to Standard 2, I believe that the original use is strongly related to historic character. In this case, that character is industrial. The conversion to condominiums alters the character of the building, even if the architecture is maintained.

As an academic, I advocate for the preservation of all of the buildings, in the broadest sense of the term. This advocacy predates any knowledge of this project. My sincere belief is that the neighborhood does not benefit from condominiums and that the project does compromise the significance of the building.

Sincerely,

Mark Kessler

Russian Hill Community Association

18 Delgado Place San Francisco, CA 94109 415-776-2014

ATTACHMENT #2 to ADDENDUM TO RESPONSE TO NOP

Existing Use is Transit-First Friendly
Proposed 1945 Hyde Street Project Requires an EIR

The Russian Hill Community Association's 1945 Hyde Street Project Teamprovide the following for consideration.

Transit First? Counter intuitively, the proposed project is not Transit-First friendly, while the existing use is Transit-First friendly.

1. ***The City's Transit First Policy is not anti-car.*** Numerous objectives and policies of the General Plan, the Transportation Element in particular, codify this point, require a balanced approach, include neighborhood parking as part of the mix of uses needed for a livable community. Nothing in the City's policies calls for the eradication of all cars from city streets.

2. ***Transit first originated around a specific type of vehicle trip, downtown commute,*** and to some degree downtown shopping trips, and it is really focused on new development, new investment, particularly transportation infrastructure investment. It makes sense to target a large proportion of new investment in transportation and development in ways that expand transit and the modes of other non-single-occupancy vehicles of a future sustainable multi-modal transportation system integrated with a land use pattern organized around optimizing access to uses, not mobility. But the same logic does not justify reducing the City's off-street parking supply by removing existing and historic off-street parking structures that were designed and still function as accessory parking for the neighborhood.

3. ***Eliminate Proposed Parking from the Proposed Project to Make it Transit-First Friendly.*** If the proposed project were to go forward, the only way to make it truly transit first, or as close as possible with new development, would be to forbid the inclusion of parking in the project, as is advocated in the Market-Octavia Plan area as well as in the Eastern Neighborhoods area and current planning policy more generally in San Francisco.

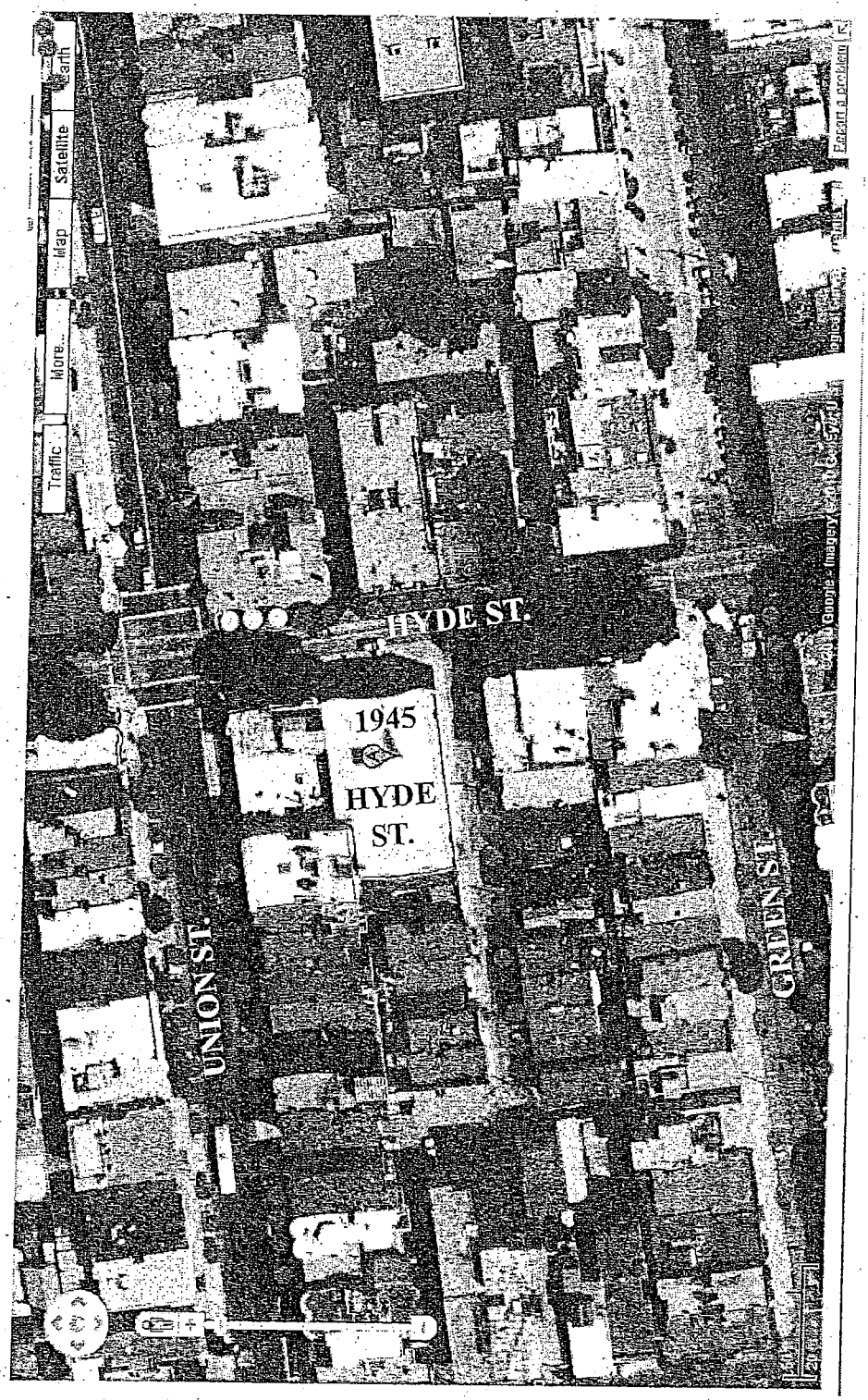
4. ***In the case of the proposed project, the most Transit-First-friendly project, the most environmentally sound project, would be retaining the existing use.***

Russian Hill Community Association

18 Delgado Place San Francisco, CA 94109 415-776-2014

ATTACHMENT #3 to ADDENDUM TO RESPONSE TO NOP

3 block radius surrounding 1945 Hyde Street Google Earth Map indicates there currently are 125+/- on-street parking places available and used



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July 27, 2011

Hon. David Chiu, President
San Francisco Board of Supervisors
City Hall, Room 244
1 Carlton B. Goodlett Place
San Francisco, CA 94102

RE: 1945 Hyde Street: Opposition to Appeal of Categorical Exemption
File No. 110759
August 2, 2011 Hearing

Dear President Chiu and Supervisors:

We represent the project sponsor, Green Garage, LLC ("Green Garage") and its principal John Parker Willis, the owner of the property at 1945 Hyde Street (between Union and Russell Streets) on Russian Hill. We write in opposition to a Categorical Exemption appeal filed by the Russian Hill Community Association (Appellant). Appellant desires no change in use of a private repair and parking garage and would have the Board reverse its and the City's long standing Transit First policy that does not treat private parking concerns as CEQA issues. We urge the Board to confirm the Transit First policy by rejecting the Appeal.

Project Description. Green Garage proposes an adaptive reuse converting the existing two-story plus basement vacant repair garage with ancillary private parking to 7 two-bedroom dwelling units and a ground floor commercial space, while preserving 17 basement parking spaces (7 for the 7 dwelling units and 10 for community use). The repair garage ceased operations in 2007, and the building has offered a small amount of hourly parking only since 2008, while monthly parking used by about 20 vehicle owners has been available for several years. The project includes a new third floor addition with a contemporary but compatible design, within the 40-foot height limit and set back from both the front, back and side property lines to render it minimally visible from most vantage points and to preserve light, air and views for adjacent properties. Curb cuts and garage doors would be reduced from four on Hyde Street (where they conflict with pedestrian travel and the Hyde Street cable car line) to one on Russell Street. The Project architects are Ogrydziak/Prillinger Architects. Plans are attached as Exhibit A.

The Project will pay an Affordable Housing Fee to the City of approximately $468,000 and generate about 30 construction jobs over the course of the one-year construction period.

Unanimous Planning Commission Approval. The site is zoned NC-1 and is within a 40-X height and bulk district. The Project is principally permitted (up to 8 units and 12,035 square feet of commercial space are allowed as of right) but requires a "rear yard modification" for the configuration of the new third floor. Appellant and Russian Hill Neighbors filed two discretionary review requests. The Planning Commission and Zoning Administrator (who issues rear yard modifications) first heard the Project at a D.R. hearing on March 10. The Commission continued its consideration to May 19, and then again to June 16, 2011. During these continuances, Green Garage met many times with Appellant, Russian Hill Neighbors, area merchants, adjoining property owners, and with Supervisor Chiu's office. As a result of those meetings, Green Garage incorporated several revisions into the Project, including the 10 community parking spaces (none were originally proposed), certain design refinements, and a reduction in the size of the third floor addition.

The Planning Commission unanimously approved the Project on June 16 and directed the Zoning Administrator on the issuance of a rear yard modification that remains pending (once the Cat. Ex. was appealed, the ZA must await resolution of this appeal before issuing the final rear yard modification letter). By the conclusion of the June 16 hearing, only Appellant, who desires no change of use from a private repair/parking garage to a mixed-use building of homes, businesses and parking, remained in opposition. Russian Hill Neighbors have not joined this appeal.

Class 32 Categorical Exemption. 1945 Hyde was built in 1920 and has been determined to be an historic resource. The adaptive reuse preserves all of the character-defining features of the building, and the Planning Department determined the proposed alterations and addition are consistent with the Secretary of the Interior's Standards for a rehabilitation project. That, in combination with the minimal environmental impacts associated with a mere 7 dwelling units and the City's consistent Transit First policy that does not treat the reduction of private non-accessory parking as a CEQA issue, led to issuance of a Class 32 In-fill Development Categorical Exemption Determination on May 16, 2011.

Unlike a Class 1 exemption (reuse of existing buildings) or a Class 2 exemption (small additions), both of which this Project likely also qualifies for, the Planning Department prepares a detailed analysis for any Class 32 exemption. In this case, the Department's Class 32 Exemption Certificate provides a comprehensive explanation why the Project could not have any significant adverse impacts on the environment, including a discussion of zoning and General Plan compliance, traffic, parking, construction noise, air quality, historic resources, hazardous materials, and aesthetics and neighborhood character.

It is difficult from Appellant's one-page Appeal letter to understand on what basis it believes the Categorical Exemption is inappropriate. Nonetheless, the Planning Department has prepared a comprehensive Response to Appellant's current and past objections, and we join in that Response.

No Merit to Appeal. From the beginning, Appellant's opposition has focused on the conversion of a private parking garage. The Planning Commission facilitated a favorable compromise on that issue by requiring 10 parking spaces in the Project to be set aside for community use. That apparently is not good enough for Appellant, however, and at the June 16

hearing they continued to argue for no change to the existing garage, or at most the conversion of only the top floor to residences, leaving about 33 monthly or hourly private parking spaces. Alternatively, they argued for demolition of the existing garage altogether, despite its historic status, belying any real concern they have for the historic integrity of the garage and Green Garage's sensitive rehabilitation design.

The right mix of uses was a matter for the Planning Commission to decide (appeals of D.R. decisions are to the Board of Appeals, not the Board of Supervisors); what is before this Board is only whether the Project as approved is exempt from CEQA. A review of the Class 32 Categorical Exemption Certificate clearly establishes that it is. According to CEQA Guidelines Section 15332:

> Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.
>
> (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
>
> (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
>
> (c) The project site has no value, as habitat for endangered, rare or threatened species.
>
> (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
>
> (e) The site can be adequately served by all required utilities and public services.

In addition, to qualify for any exemption, CEQA Guidelines Section 15300.2 specifies in relevant part:

> (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

There is no question but that 1945 Hyde occurs within San Francisco's City limit, is less than 5 acres in size, is surrounded by urban uses, has no habitat value, can be adequately served by all required utilities and services, and that there are no successive projects of the same type in the same place, over time. The remainder of this letter focuses on the other questions: consistency with zoning and the General Plan; effects relating to traffic, parking and noise; unusual circumstances; and historic resource impacts.

A. <u>The Project is consistent with zoning and neighborhood character and furthers numerous General Plan policies; retaining a private single-use private parking garage does not.</u>

It is undisputed that 7 two-bedroom dwelling units, 860 square feet of ground floor commercial space and 17 parking spaces in a structure up to 40 feet in height complies with the NC-1 zoning and 40-X height and bulk district. The neighborhood's mixed use character will be enhanced by the Project. Like most of the buildings in this NC-1 district along Hyde Street, the Project will provide housing above ground floor commercial space. The incompatible existence of a multi-story repair and parking garage and four curb cuts and garage doors facing directly

onto Hyde Street will be eliminated, with the new single curb cut and garage entrance moved to Russell Street.

Because the Project will conform exactly to the NC-1 district controls and eliminate a use that was in conflict with current zoning, the Project enhances the area's mixed-use character.

However, Appellant previously argued that the Project is the wrong land use for this site because the General Plan favors retaining existing private garages, even though they were not able to find any such a policy in the General Plan. To the contrary, there are numerous General Plan policies and Citywide goals that favor this Project over retaining a single-use parking garage.

First, the Project provides 7 family sized units, a type of housing in great demand in the City and promoted with great emphasis in the 2009 Housing Element. Second, these units are located near downtown in a transit rich neighborhood, promoting both sustainability principles embraced by the City through the General Plan and other policies and the City's long standing commitment to Transit First.

Appellant's position that retention of a private parking garage is favored by the General Plan is in direct conflict with Objective 34 and Policies 34.3 and 34.5 of the General Plan's Transportation Element, which discourage excessive parking in areas like Russian Hill:

> OBJECTIVE 34
> RELATE THE AMOUNT OF PARKING IN RESIDENTIAL AREAS AND NEIGHBORHOOD COMMERCIAL DISTRICTS TO THE CAPACITY OF THE CITY'S STREET SYSTEM AND LAND USE PATTERNS.
>
> The increasing level of vehicle ownership by city residents indicates the need for improved transit services throughout the city. It also indicates the need for parking facilities is continuing and raises serious questions about the level of automobile ownership which can be supported by the street and parking system. Since much of the city's housing, especially in the more densely developed areas, was built prior to the time when the automobile became the dominant mode of travel, off-street parking spaces do not exist in adequate numbers. The size of many streets and the need to provide free flows for traffic limits the number of on-street spaces. Just as the street system cannot accommodate all potential traffic, so the city cannot provide for an unlimited level of automobile storage. A reasonable level must be provided for and measures should be considered to discourage vehicle accumulations beyond that level.
>
> POLICY 34.3
> Permit minimal or reduced off-street parking supply for new buildings in residential and commercial areas adjacent to transit centers and along transit preferential streets.
>
> Where there is a high concentration of transit service, as in the northeastern portions of the city, census tract figures indicate that residents are less likely to own automobiles and more likely to use public transit. High-density housing and housing for the elderly are already eligible for reductions in the standard provisions for off-street parking, enabling the building sponsors to build more economically. These buildings should be encouraged where transit service is plentiful and comprehensive.

POLICY 34.5
Minimize the construction of new curb cuts in areas where on-street parking is in short supply and locate them in a manner such that they retain or minimally diminish the number of existing on-street parking spaces.

B. The Project will not result in any significant environmental effects relating to the reduction of monthly parking spaces.

Appellant's real argument is their claim that the potential elimination of about 20 monthly parking spaces is a significant impact on the physical environment. First, that argument flies directly in the face of the City's standard CEQA analysis: that parking shortfalls are an inconvenience to drivers but are not adverse impacts on the environment. Below is the standard language that is inserted in every one of the City's CEQA documents, including this Categorical Exemption Certificate (see page 7):

> San Francisco does not consider parking supply as part of the permanent physical environment and therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.
>
> Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment.

This approach to analyzing parking effects was upheld by the California Court of Appeal in *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002 102 Cal.App.4th 656). In that case, petitioners argued exactly as Appellant does there – that a potential parking shortfall associated with the San Francisco Center/Bloomingdales project was a significant impact on the environment for which CEQA required analysis and mitigation measures. The City Attorneys office ably briefed and argued to the contrary (that parking shortfalls are a social inconvenience to drivers, not an adverse impact on the physical environment). Both the Superior Court and the Court of Appeal agreed with the City, and held that the City's Transit First policy correctly removed analysis of parking shortfalls from CEQA review.

Even if parking shortfalls were considered a topic for CEQA analysis, Appellant have failed to show that reducing community parking from up to 58 spaces (which have never been fully occupied and much of which has been available only since the repair garage closed in 2008) to 10 spaces will significantly inconvenience Russian Hill residents and businesses.

Hourly parking has been provided in the evenings only since October 2008, and it is used by a small number of diners at a few neighborhood restaurants on Hyde Street on weekends, but gets little use during the week. Since the hourly parking began only in October 2008, its removal would simply return the neighborhood to the conditions that existed prior to that time. Nonetheless, at the request of Russian Hill Neighbors, Green Garage is retaining 10 community

spaces, and the Planning Commission's conditions of approval require those spaces to have priority use as hourly parking for area restaurants. Evidence before the Planning Commission indicates that is a sufficient number to serve the short-term parking needs for the small number of nearby restaurants.

Monthly parking in the garage is not heavily used, indicating little need for the parking. Garage occupancy has been well below 50% over the last several years. When Green Garage purchased the building in 2009, there were 23 neighborhood monthly parkers paying $400/month to park, including the President of Appellant, Kathleen Courtney. That number has decreased since then to 20 monthly parkers. That means that contrary to the D.R. Requestors' allegations, few neighbors have availed themselves of this parking resource in recent years. Russian Hill is both close to downtown and has excellent MUNI service, including three lines immediately adjacent to the Project site: Hyde Street cable car and the 41 and 45 MUNI bus lines. In addition, there are other private garages in the neighborhood that consistently advertise available monthly spaces on Craigslist.

Based on the above, Appellant's argument that the removal of a small amount of monthly parking would have an adverse impact on the physical environment requiring preparation of an EIR is both exaggerated and contrary to CEQA and the City's Transit First policy.

C. The Project will not result in any significant effects relating to traffic.

Appellant previously expressed concern about new traffic hazards arising from construction traffic and access to the Project's parking garage on Russell Street. Both concerns are without merit, were addressed by the Exemption Certificate, and do not result in any significant traffic impacts.

There will be no unusual construction methods or equipment needed for this modest project, the construction period of which will last only 10-14 months. As the Categorical Exemption explains, no traffic lanes need to be closed during construction, a maximum of 20 construction workers will be on-site at any one time, and construction-related truck trips would be regulated by DPT to avoid potential traffic disruption. Green Garage will make accommodations nearby for construction worker parking. (Exemption Certificate, p. 5-6).

The Planning Department determined that Project garage access from Russell Street was safer and more attune to City policies than maintaining curb cuts and garage doors on Hyde Street, a Primary Transit Street: (1) there is less traffic volume on Russell Street compared to Hyde; (2) eliminating curb cuts and garage doors on Hyde Street will avoid conflicts that arise with the cable car line; and (3) pedestrian volumes are much higher on Hyde Street than Russell. (See page 4 of Exemption Certificate.) Rather than making access safer, access from Hyde Street would have a greater risk of creating traffic, transit and pedestrian hazards. In addition, the incline of the existing ramp from Hyde Street leading to the lower garage level (that RHCA proposes to be retained) is so steep that exiting drivers cannot see pedestrians on the sidewalk, creating a safety hazard.

D. The Project will not cause a substantial adverse change in the significance of a historical resource.

The Project proposes a variety of exterior alterations, including closing up the four garage doors on Hyde Street and replacing them with the building entrance and commercial storefront and replacing all of the building's highly deteriorated existing windows with visually identical units. An Historic Resource Evaluation (HRE) was prepared by Kelley & VerPlanck, dated February, 2010. (See Exhibit B). The alterations, including the new third floor, were determined by the HRE to comply with the Secretary of the Interior's Standards, and none was found to result in a significant impact to an historic resource. The Planning Department concurred in its Historic Resource Evaluation Response (HRER), prepared by Moses Corrette and published on July 8, 2010. (See Exhibit C)

Appellant has argued in the past that a change of use from parking to a mix of residences, commercial space and parking is inherently inconsistent with the Secretary of the Interior's Standards and therefore a significant adverse impact on an historic resource. That argument completely misreads the Secretary's "rehabilitation" standards. The Secretary's Standards define a rehabilitation project as one that generally involves the change of use of an historic resource:

> *Rehabilitation* is defined as the process of returning a property to a state of utility, through repair or *alteration,* which makes possible an efficient *contemporary use* while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values.

Accordingly, the change of use from a repair and parking garage to a mixed-use project is wholly consistent with the Secretary's Standards, provided the features of the property that are significant to its historic, architectural and cultural values are preserved. Both Kelley & VerPlanck and the Planning Department determined they were.

E. Noise from construction will be mitigated by compliance with the City's Noise Ordinance.

Appellant claims that the duration of construction will create unmitigable noise impacts. To the contrary, construction is subject to the restrictions of Article 29 of the Police Code, which effectively reduces construction noise impacts to insignificance. Section 2907 provides: "it shall be unlawful for any person to operate any powered construction equipment if the operation of such equipment emits noise at a level in excess of 80 dBA when measured at a distance of 100 feet from such equipment, or an equivalent sound level at some other convenient distance." Section 2909 provides: "It shall be unlawful for any person, between the hours of 8:00 p.m. of any day and 7:00 a.m. of the following day to erect, construct, demolish, excavate for, alter or repair any building or structure if the noise level created thereby is in excess of the ambient noise level by 5 dBA at the nearest property plane, unless a special permit therefor has been applied for and granted by the Director of Public Works or the Director of Building Inspection." Green Garage will comply with both of these ordinances.

The Categorical Exemption noted that the noise generated by Project construction is of a type expected "to be experienced in an urban community." (See Categorical Exemption, pp. 6-8.) Moreover, as an adaptive reuse project, demolition and exterior construction noise

(generally, the noisiest construction periods) will be minimized, since most work will be inside the existing building. Accordingly, the Project will have no significant construction noise impacts.

No Unusual Circumstances. Finally, Appellant has identified no unusual circumstances that would disqualify 1945 Hyde from the Class 32 Categorical Exemption. This is a standard small-scale in-fill development in a mixed-use neighborhood, in compliance with the Planning Code and the General Plan, and well-designed to minimize neighborhood impacts.

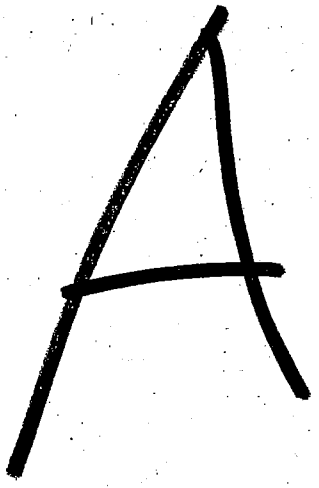
Conclusion. For the above reasons, the Appeal should be denied. The Project proposes an infill development consisting of 7 family-sized dwelling units in a mixed use neighborhood well-served by transit. The Project results in the conversion of an underutilized 58-space private parking garage to a use consistent with the NC-1 zoning, and that furthers numerous General Plan policies and citywide goals in a manner consistent with the Secretary of the Interior's Standards for a rehabilitation project, while retaining 10 community parking spaces. The Categorical Exemption correctly determined that this modest project could not have any significant impacts on the physical environment. It should be upheld.

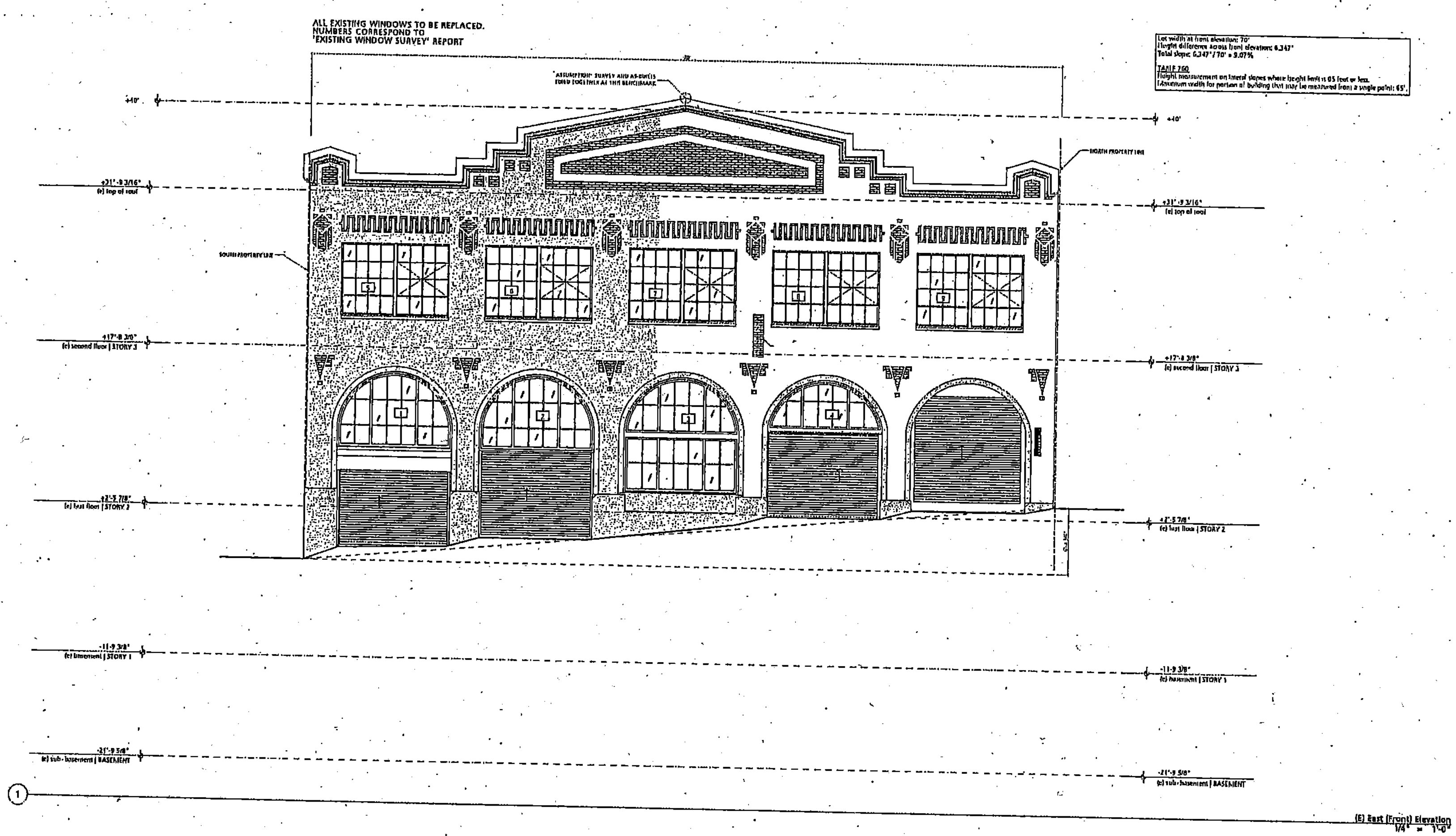
Sincerely,

Steven L. Vettel

cc: Jamie Cherry, Appellant
Bill Wycko
Chelsea Fordham, Planning Department
John Parker Willis

24782\2687128.1





1945 Hyde St.
San Francisco, CA

BLOCK: 0123 LOT: 002

BUILDING PERMIT
Initial submittal

Progress Set	06.30.2011
Site Permit - Initial Submittal	05.06.2010
Scale:	1/4" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901

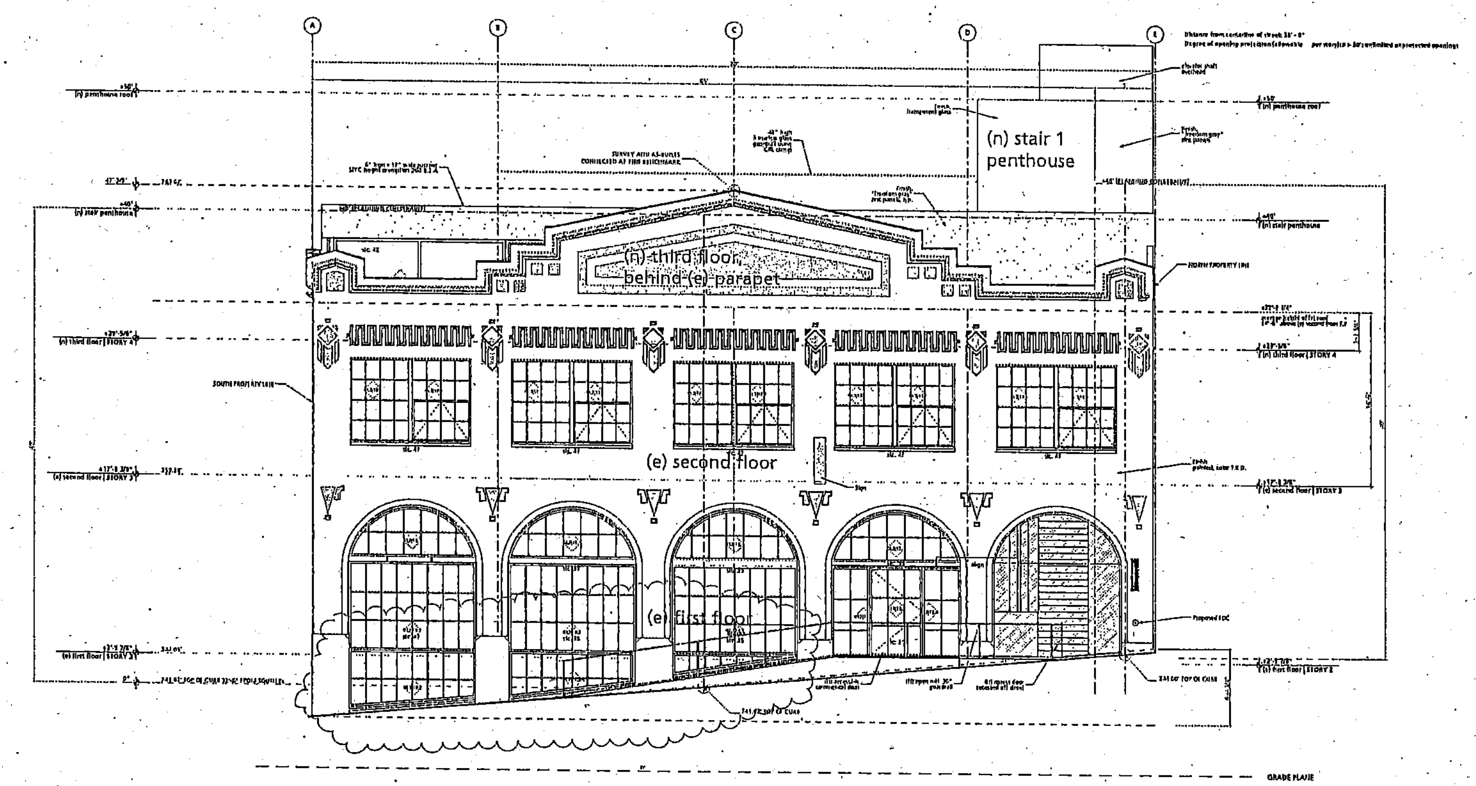
Architect Stamp:

Sheet Title:
EXISTING ELEVATION:
Front (East)

SITE PERMIT - *not for construction*

1945 Hyde St.

A2.1



Lot width at front elevation: 70'
Height difference across front elevation: 6.347'
Total slope: 6.347' / 70' = 9.07%

SF PLANNING CODE - TABLE 260

Average Slope of Curb or Ground From Which Height is Measured	Maximum Width for Portion of Building that May Be Measured from a Single Point
More than 5 percent but no more than 15 percent	65 feet

(N) East (Front) Elevation
1/4" = 1'-0"

1945 Hyde St.
San Francisco, CA

BLOCK: 0123 LOT: 002

BUILDING PERMIT
Initial submittal

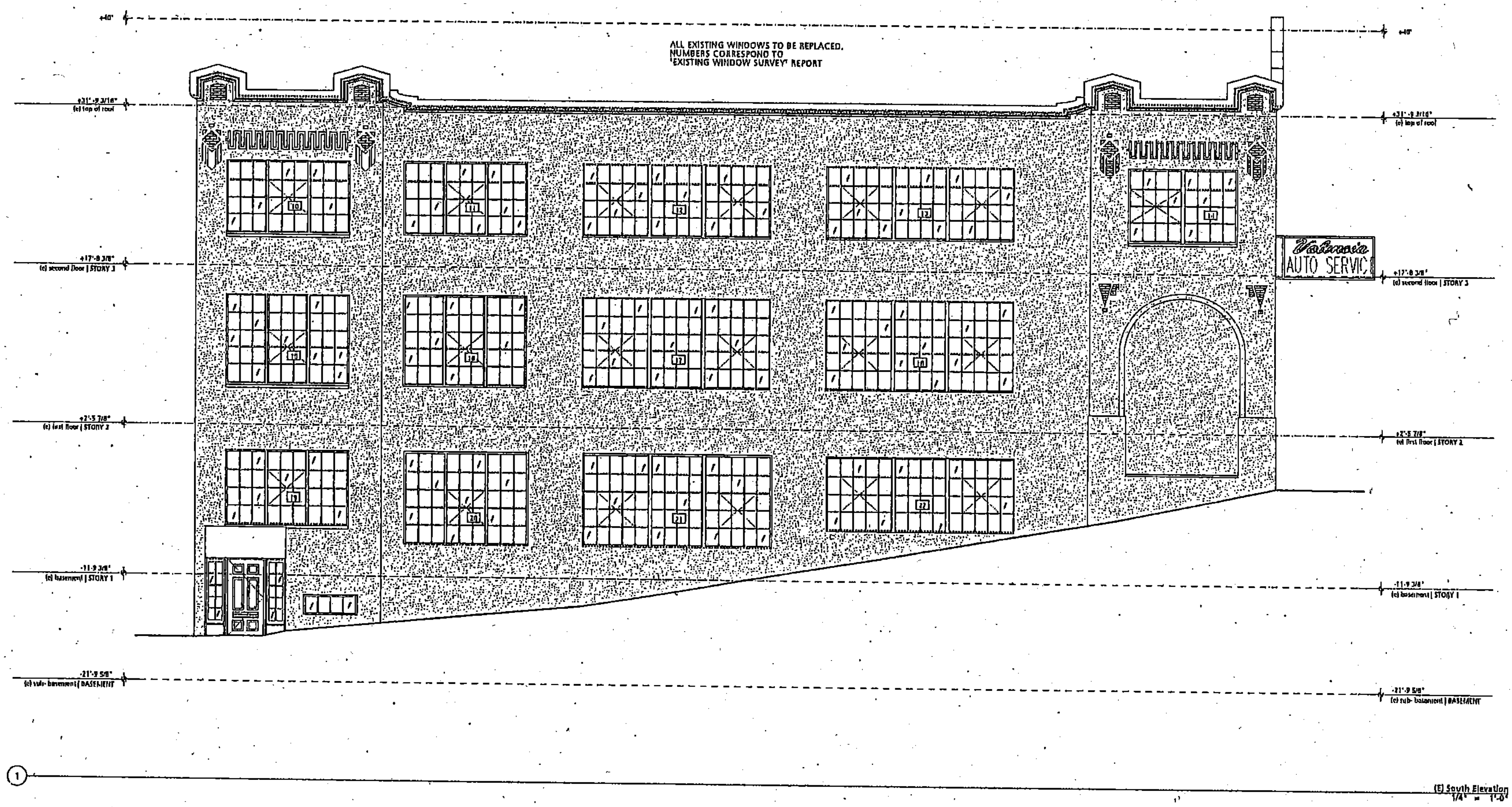
Progress Set	06.30.2011
Site Permit-Initial Submittal	05.06.2010
Scale:	1/4" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901
Architect Stamp:	

Sheet Title:
PROPOSED ELEVATION: Front (East)

1945 Hyde St.

A2.5

SITE PERMIT - *not for construction*



1945 Hyde St.
San Francisco, CA
BLOCK: 0123 LOT: 002

BUILDING PERMIT
Initial submittal

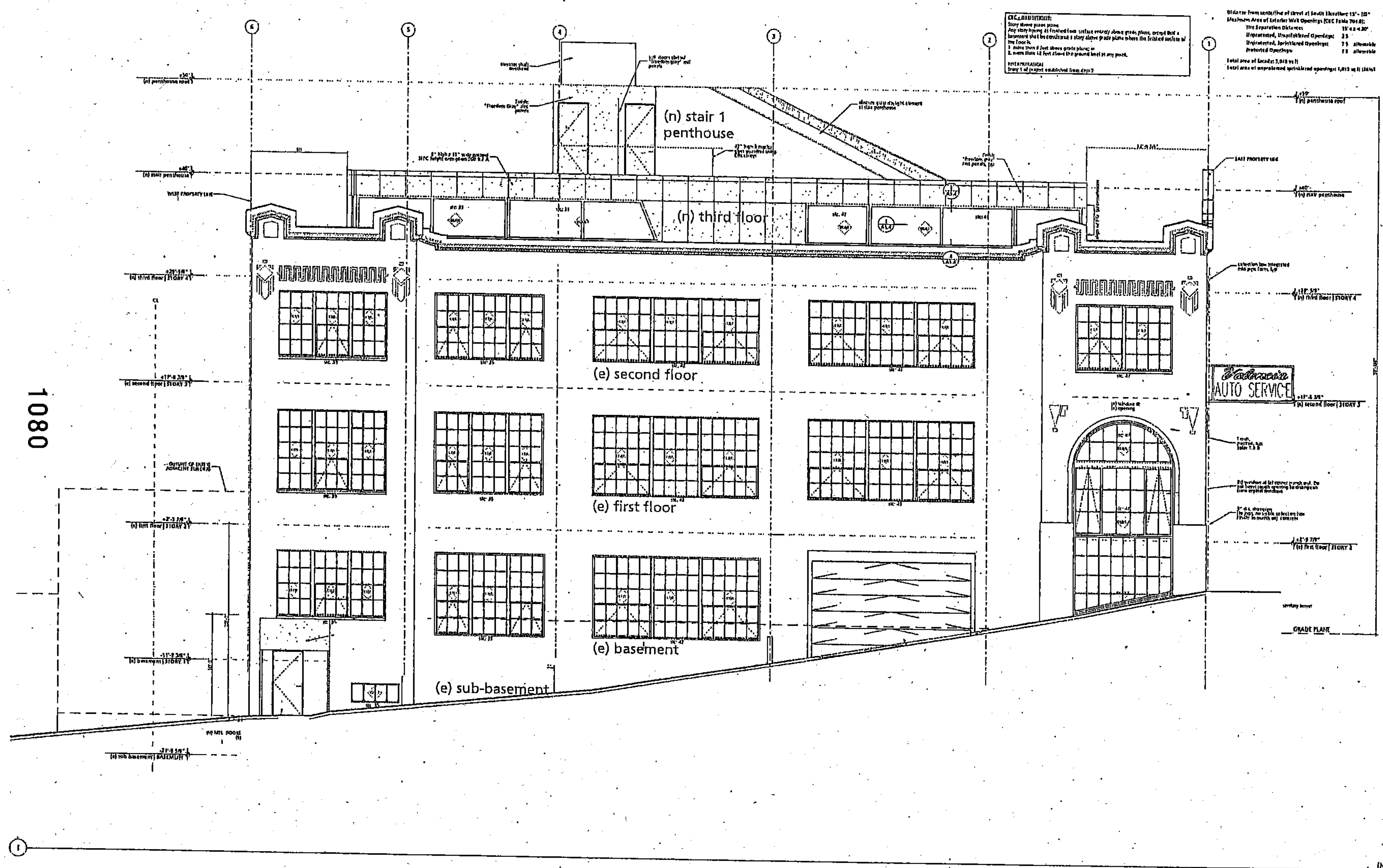
Progress Set	06.30.2011
Site Permit-Initial Submittal	05.06.2010
Scale:	1/4" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901
Architect Stamp:	

Sheet Title:
EXISTING ELEVATION:
Side (South)

SITE PERMIT - *not for construction*

1945 Hyde St.

A2.2



1945 Hyde St.
San Francisco, CA
BLOCK: 0123 LOT: 002

BUILDING PERMIT
Initial submittal

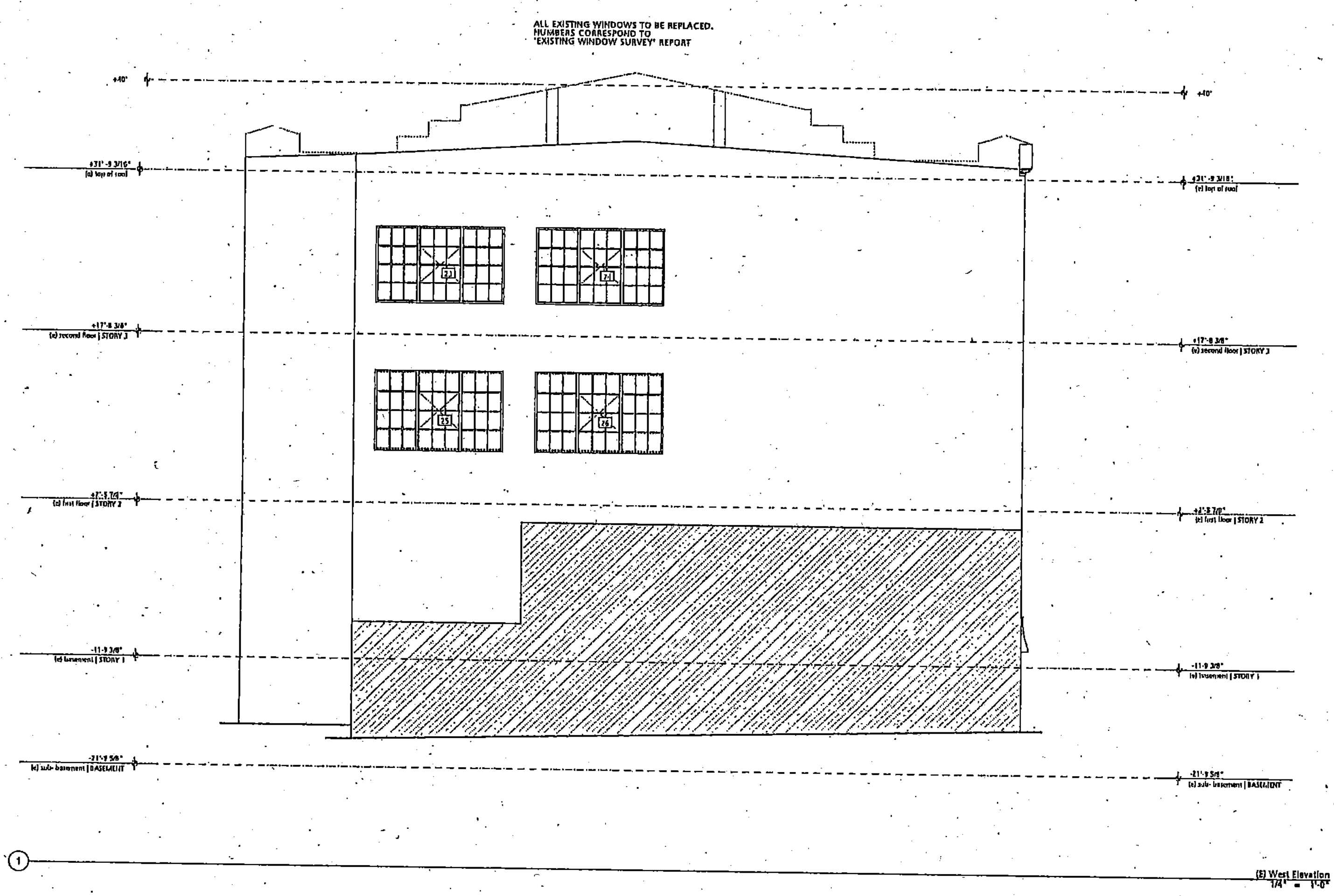
Progress Set	06.30.2011
Site Permit-Initial Submittal	05.06.2010
Scale:	1/4" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901
Architect Stamp:	

Sheet Title:
PROPOSED ELEVATION: Side (South)

SITE PERMIT - *not for construction*

1945 Hyde St.

A2.6



1945 Hyde St.
San Francisco, CA
BLOCK: 0123 LOT: 002

BUILDING PERMIT
initial submittal

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Site Permit-Initial Submittal	05.06.2010
Scale:	1/4" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901

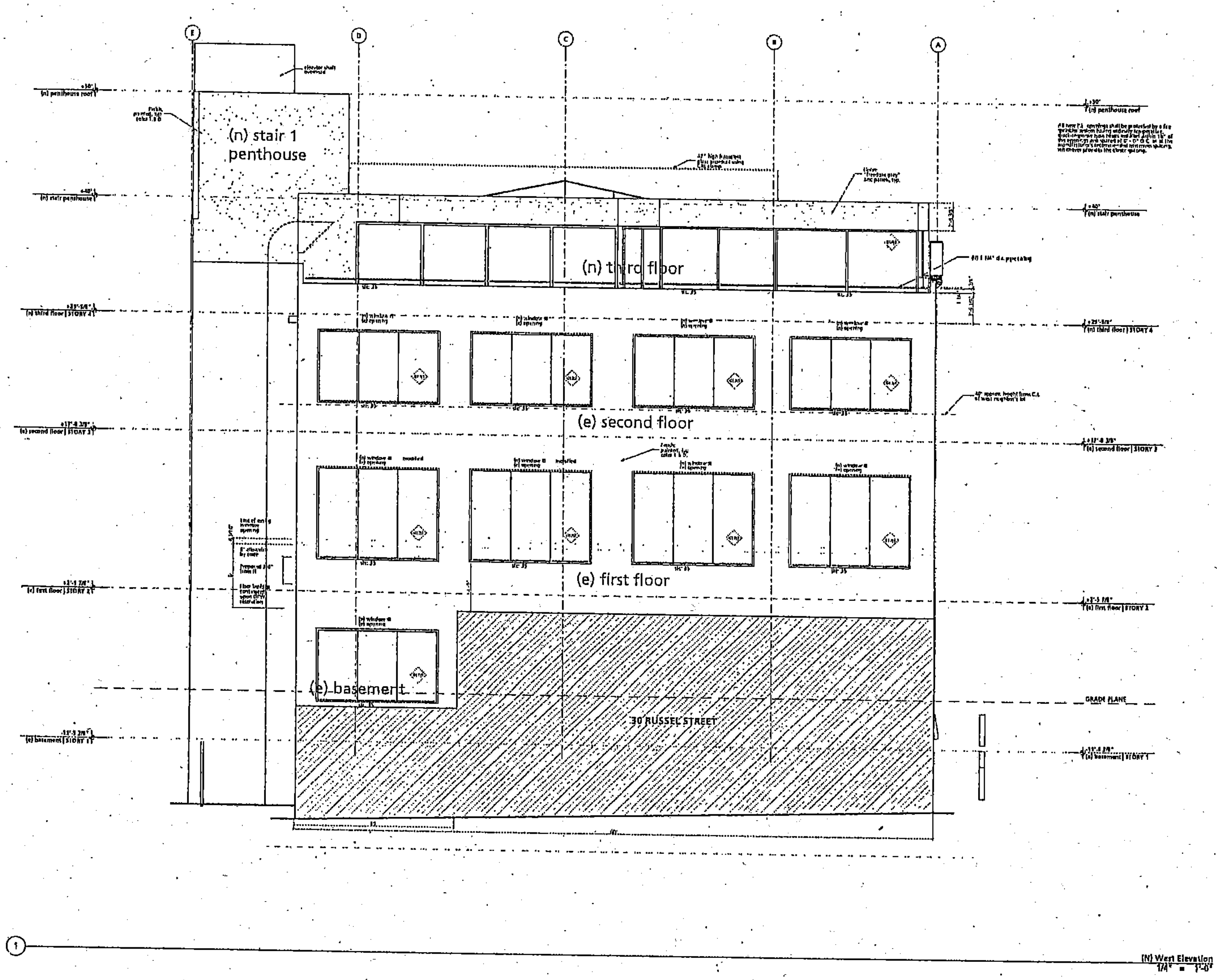
Architect Stamp:

Sheet Title:
EXISTING ELEVATION:
Side (West)

SITE PERMIT - *not for construction*

1945 Hyde St.

A2.3



1945 Hyde St.
San Francisco, CA

BLOCK: 0123 LOT: 002

BUILDING PERMIT
Initial submittal

Progress Set	06.30.2011
Site Permit-Initial Submittal	05.06.2010
Scale:	1/4" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901

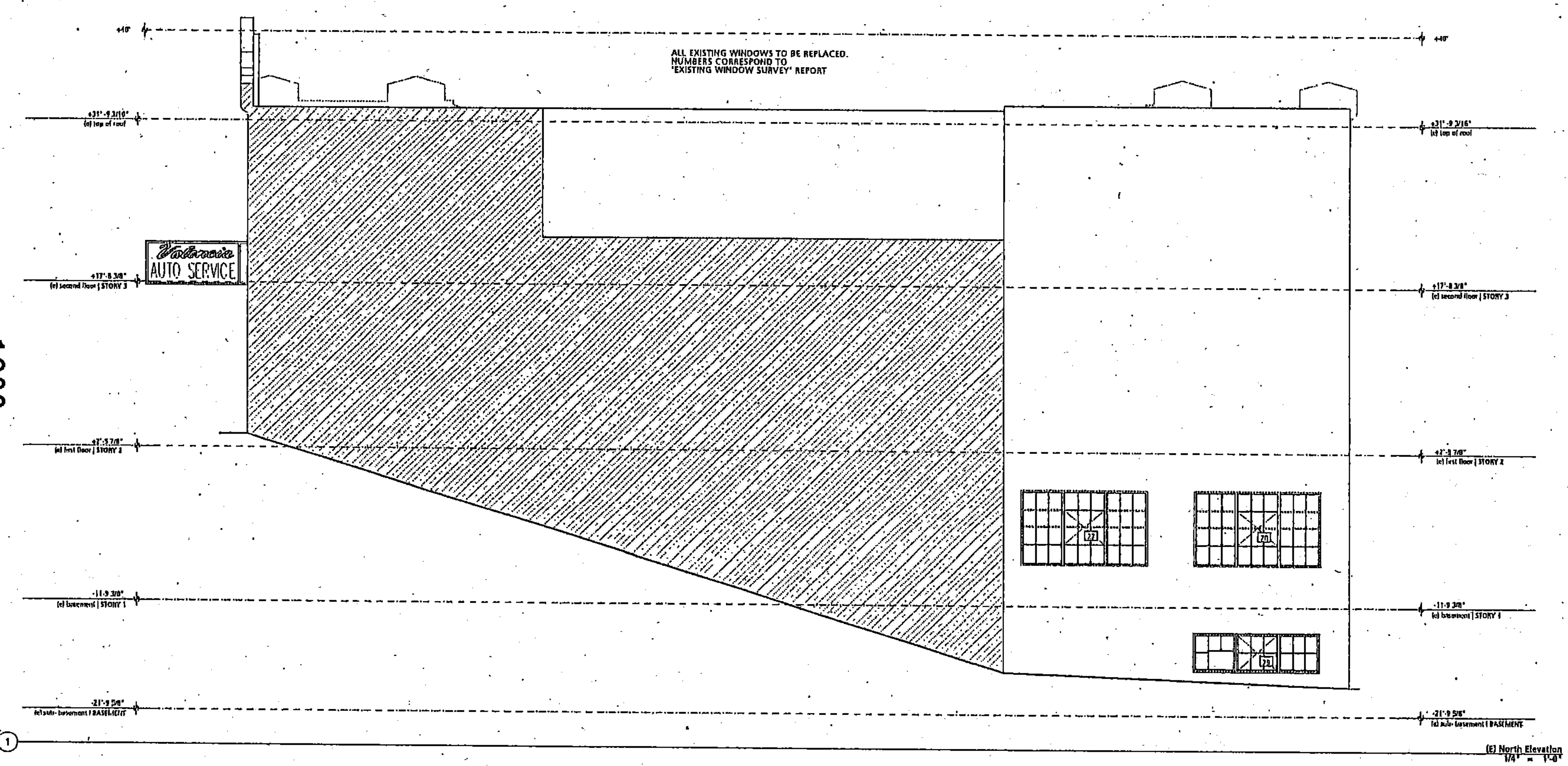
Architect Stamp:

Sheet Title:
PROPOSED ELEVATION: Side (West)

SITE PERMIT - *not for construction*

1945 Hyde St.

A2.7



1945 Hyde St.
San Francisco, CA
BLOCK: 0123 LOT: 002

BUILDING PERMIT
initial submittal

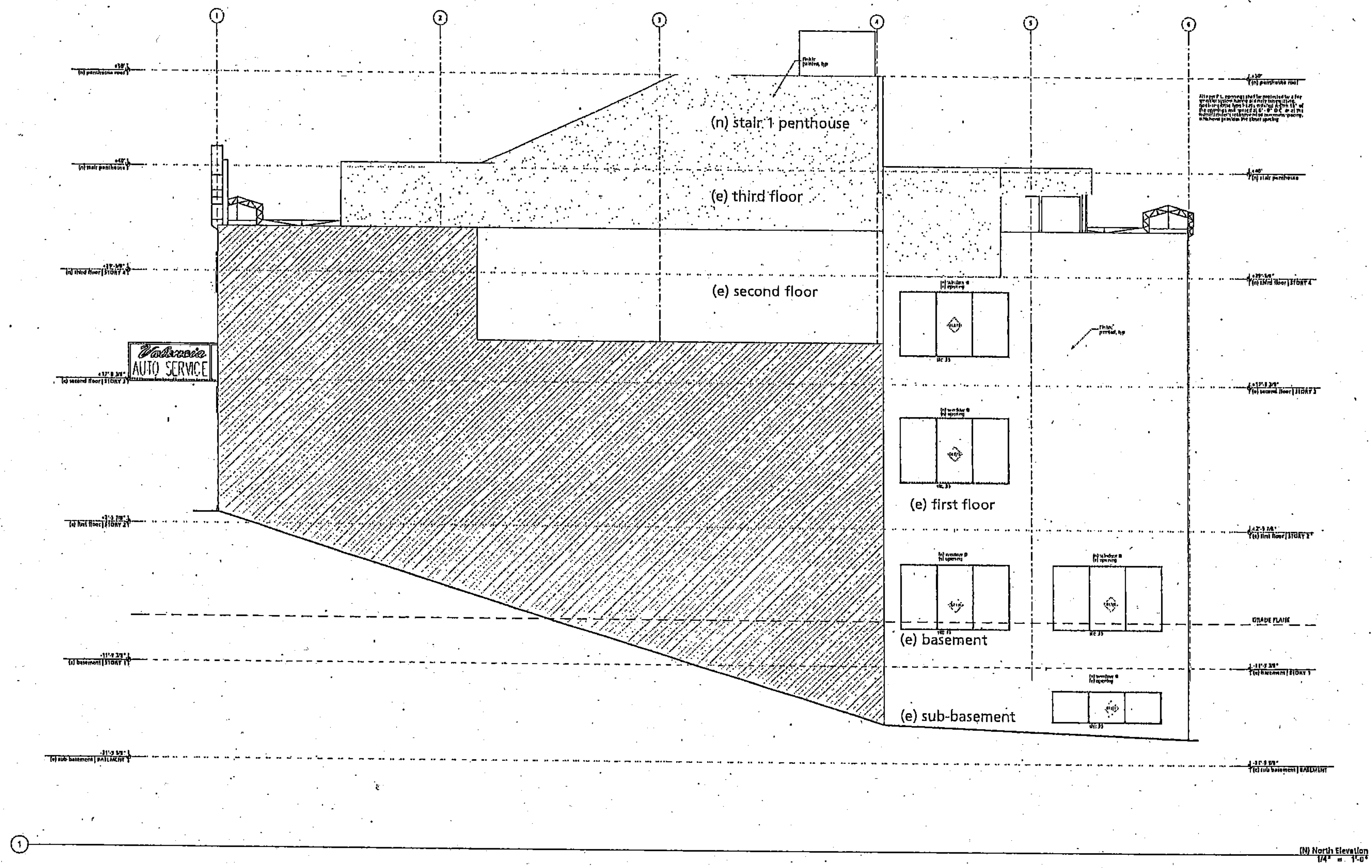
Progress Set	06.30.2011
Site Permit-Initial Submittal	05.06.2010
Scale:	1/4" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901
Architect Stamp:	

Sheet Title:
EXISTING ELEVATION:
Rear (North)

SITE PERMIT - *not for construction*

1945 Hyde St.

A2.4



1945 Hyde St.
San Francisco, CA

BLOCK: 0123 LOT: 002

BUILDING PERMIT
Initial submittal

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Site Permit-Initial Submittal	05.08.2010
Scale:	1/4" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901

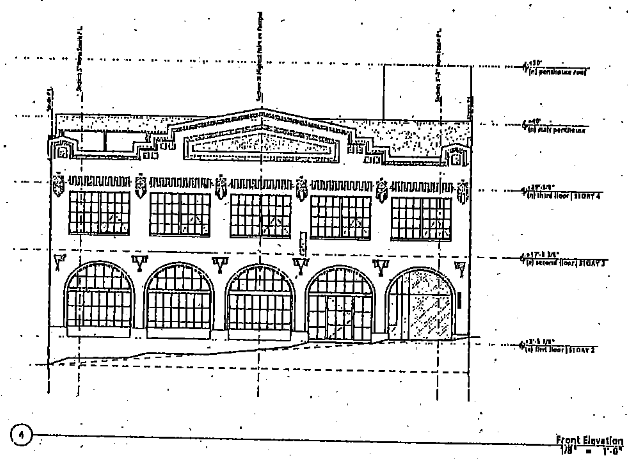
Architect Stamp:

Sheet Title:
PROPOSED ELEVATION: Rear (North)

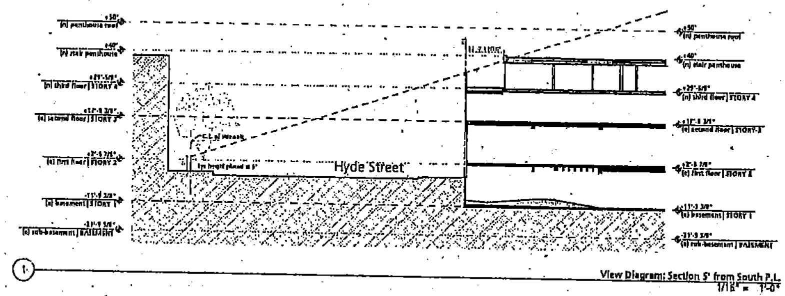
SITE PERMIT - *not for construction*

1945 Hyde St.

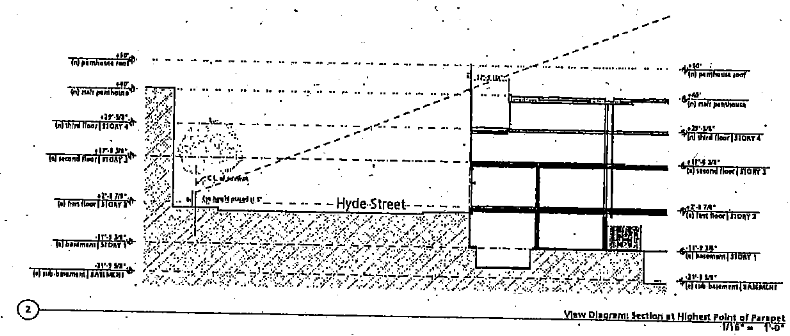
A2.8



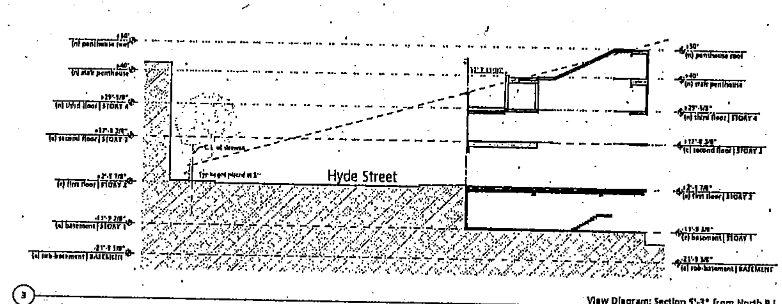
4 Front Elevation 1/8" = 1'-0"



1 View Diagram: Section 5' from South P.L. 1/16" = 1'-0"



2 View Diagram: Section at Highest Point of Parapet 1/16" = 1'-0"



3 View Diagram: Section 5'-3" from North P.L. 1/16" = 1'-0"

1945 Hyde St.
San Francisco, CA
BLOCK: 0123 LOT: 002

BUILDING PERMIT
Initial submittal

Progress Set	06.30.2011
Site Permit-Initial Submittal	05.06.2010
Scale:	1/16" = 1'-0", 1/8" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901

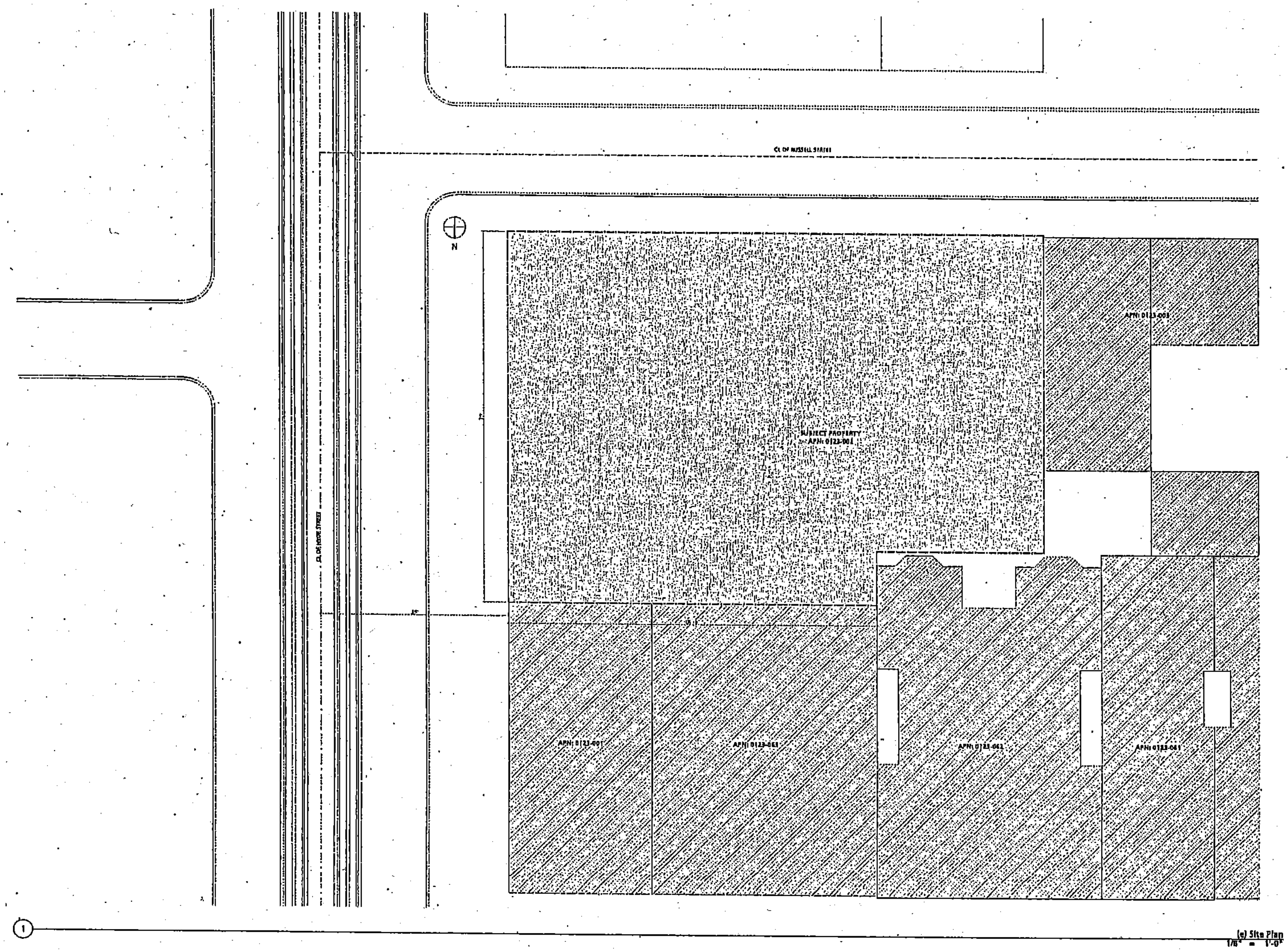
Architect Stamp:

Sheet Title:
HYDE ST VIEW DIAGRAMS

SITE PERMIT - *not for construction*

1945 Hyde St.

A0.3



1945 Hyde St.
San Francisco, CA

BLOCK: 0123 LOT: 002

[illegible] Architects
[illegible]

BUILDING PERMIT
Initial submittal

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Site Permit-Initial Submittal	05.06.2010
Scale:	1/8" = 1'-0"
Checked:	LO
Drawn:	DB, DF
Project:	0901

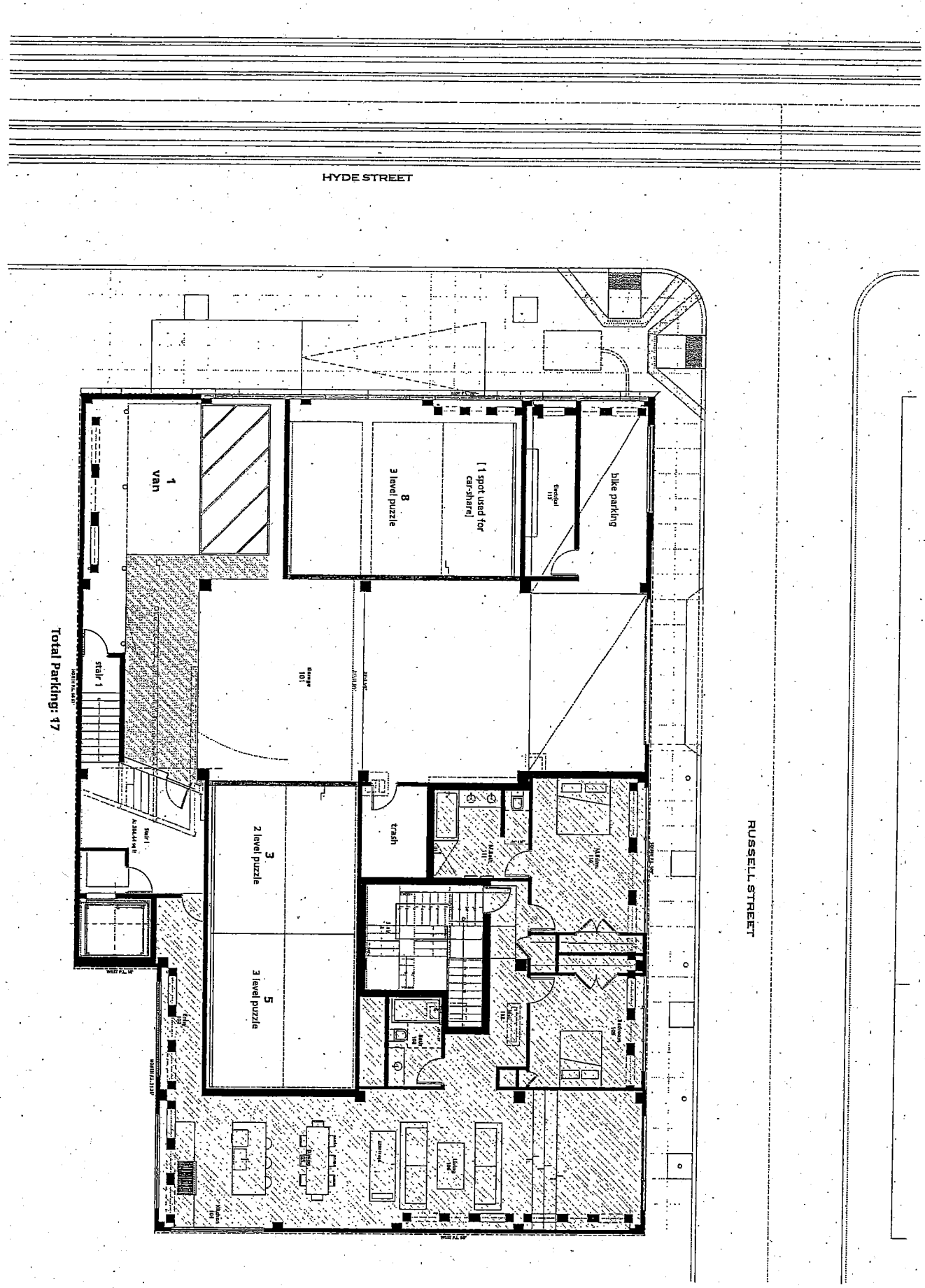
Architect Stamp:

Sheet Title:
SITE PLAN: Existing

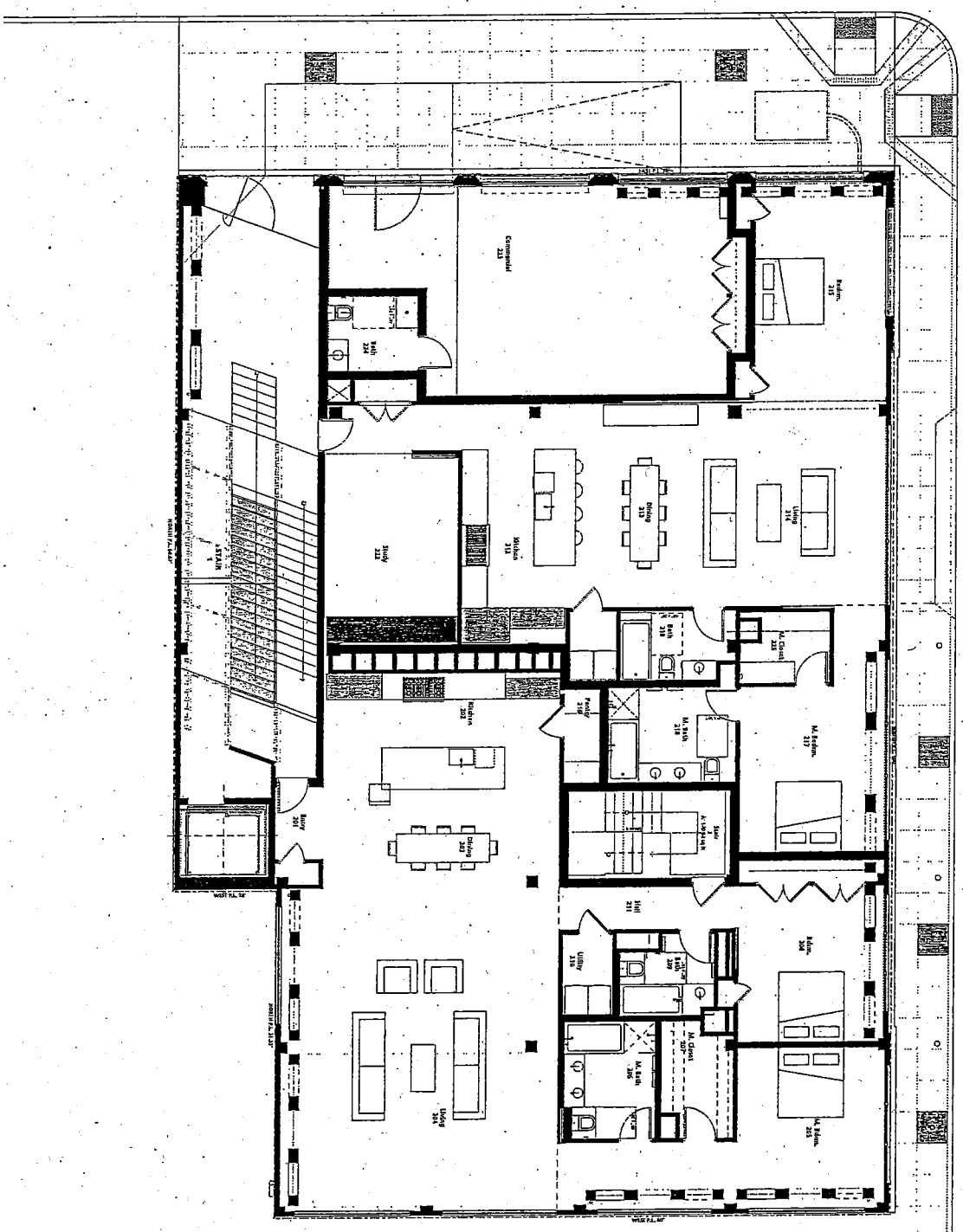
SITE PERMIT - *not for construction*

1945 Hyde St.

A1.1



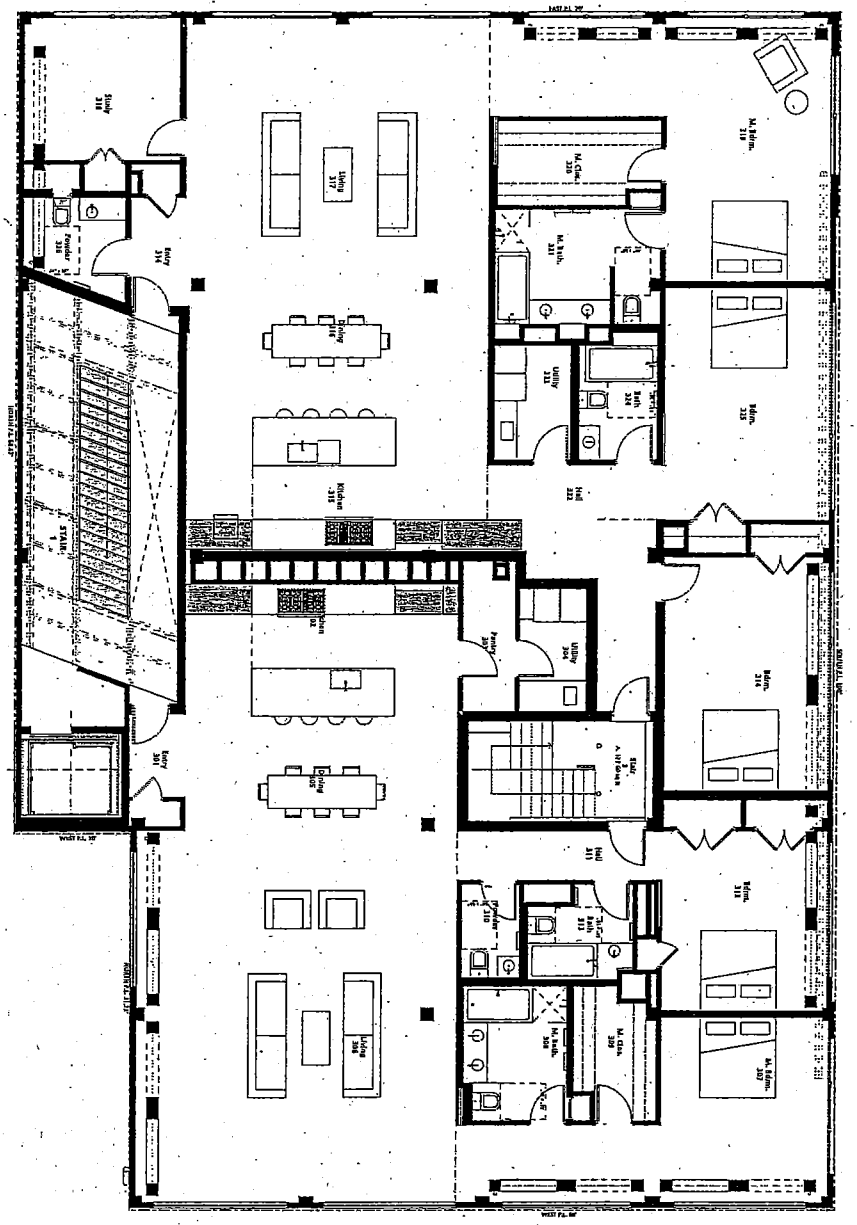
HYDE STREET



RUSSELL STREET

(e) First floor | STORY 2

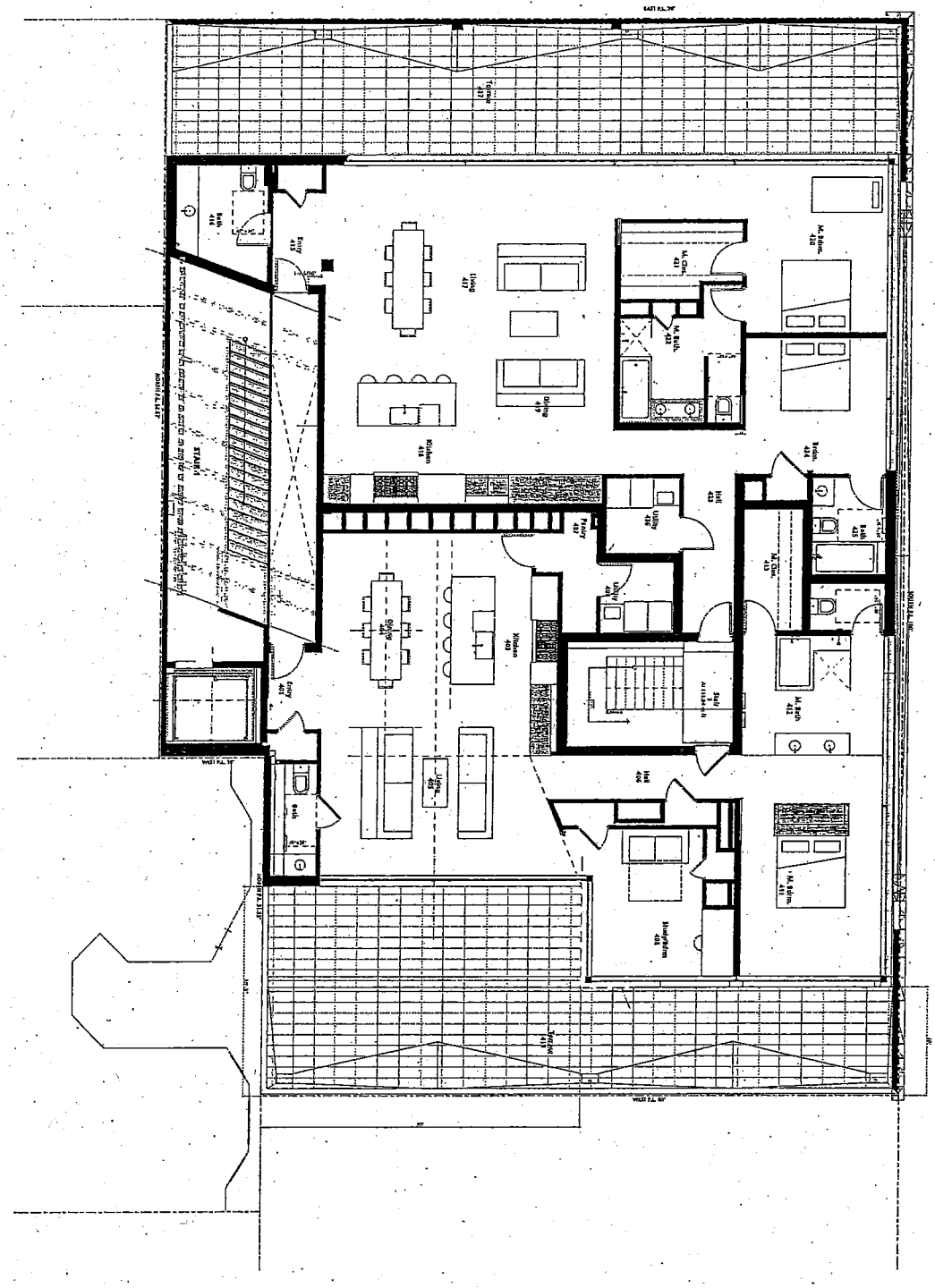
HYDE STREET



RUSSELL STREET

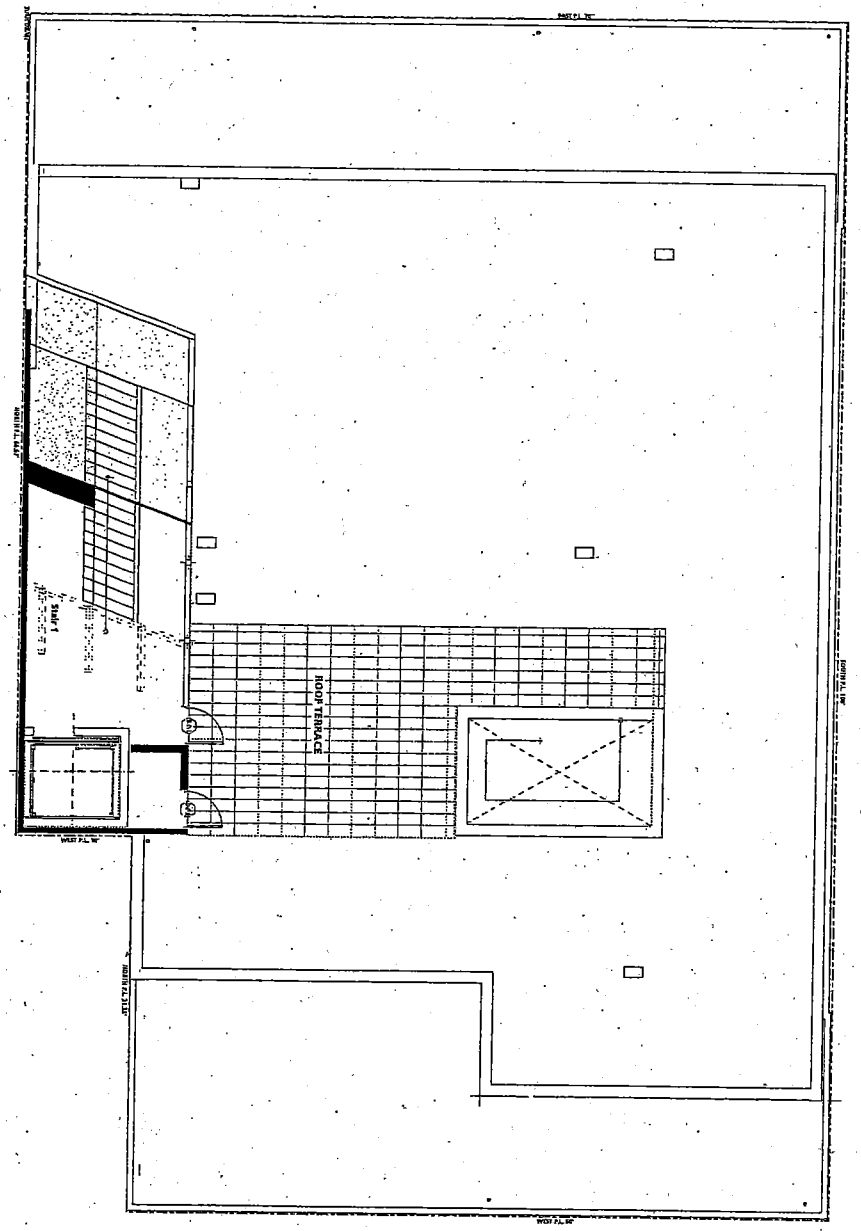
(e) second floor | STORY 2
1/4" = 1'-0"

HYDE STREET



RUSSELL STREET

HYDE STREET



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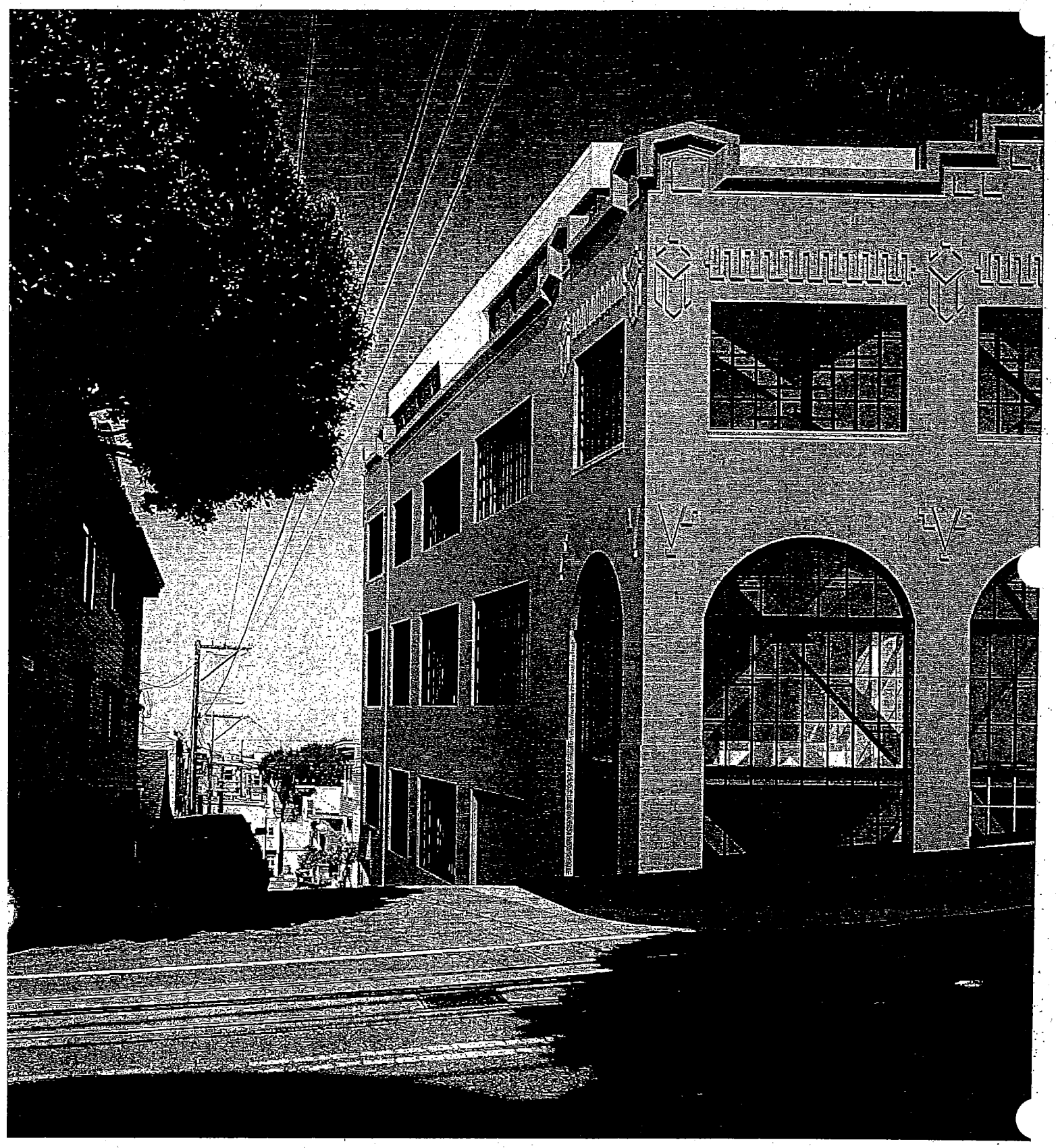
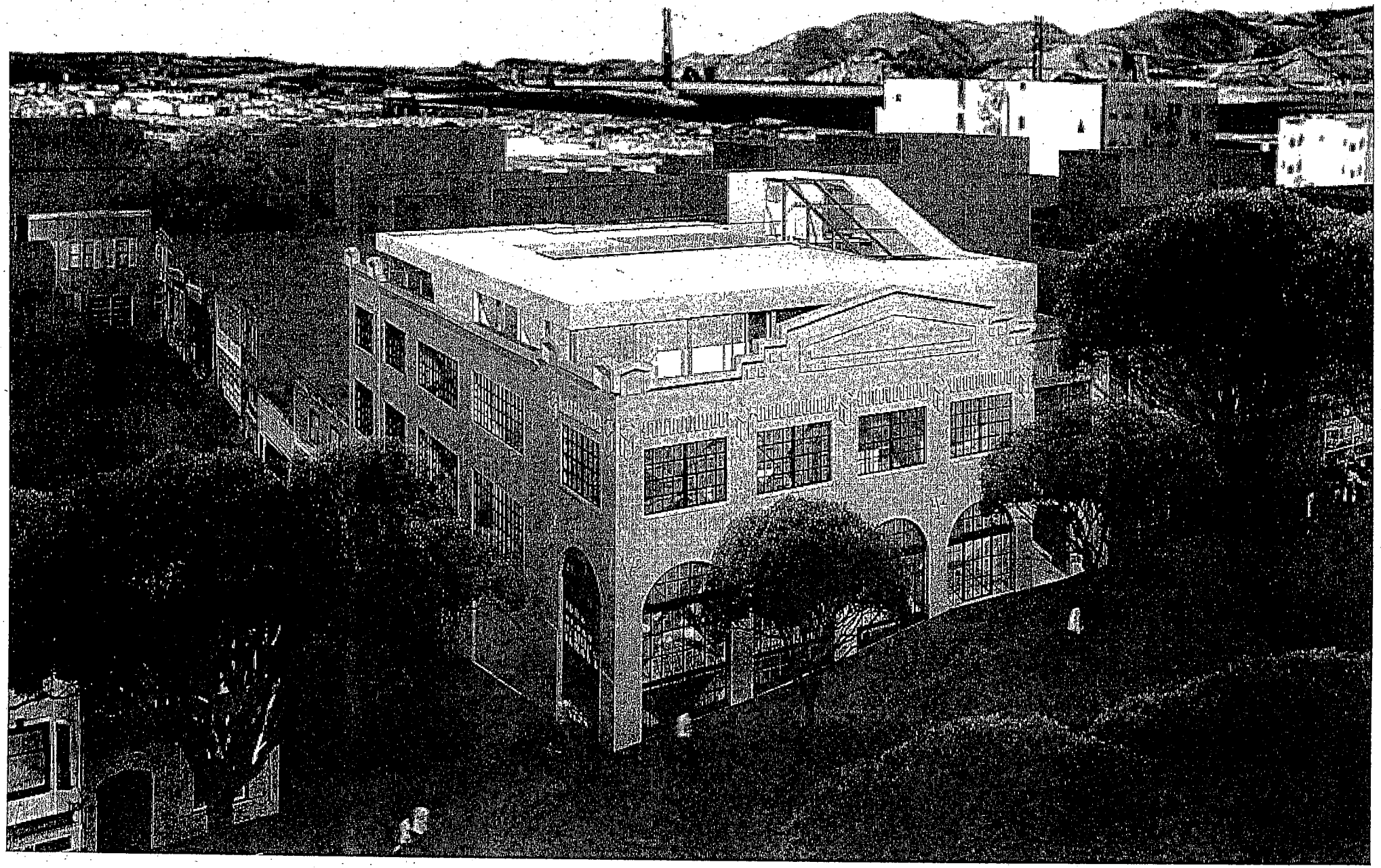


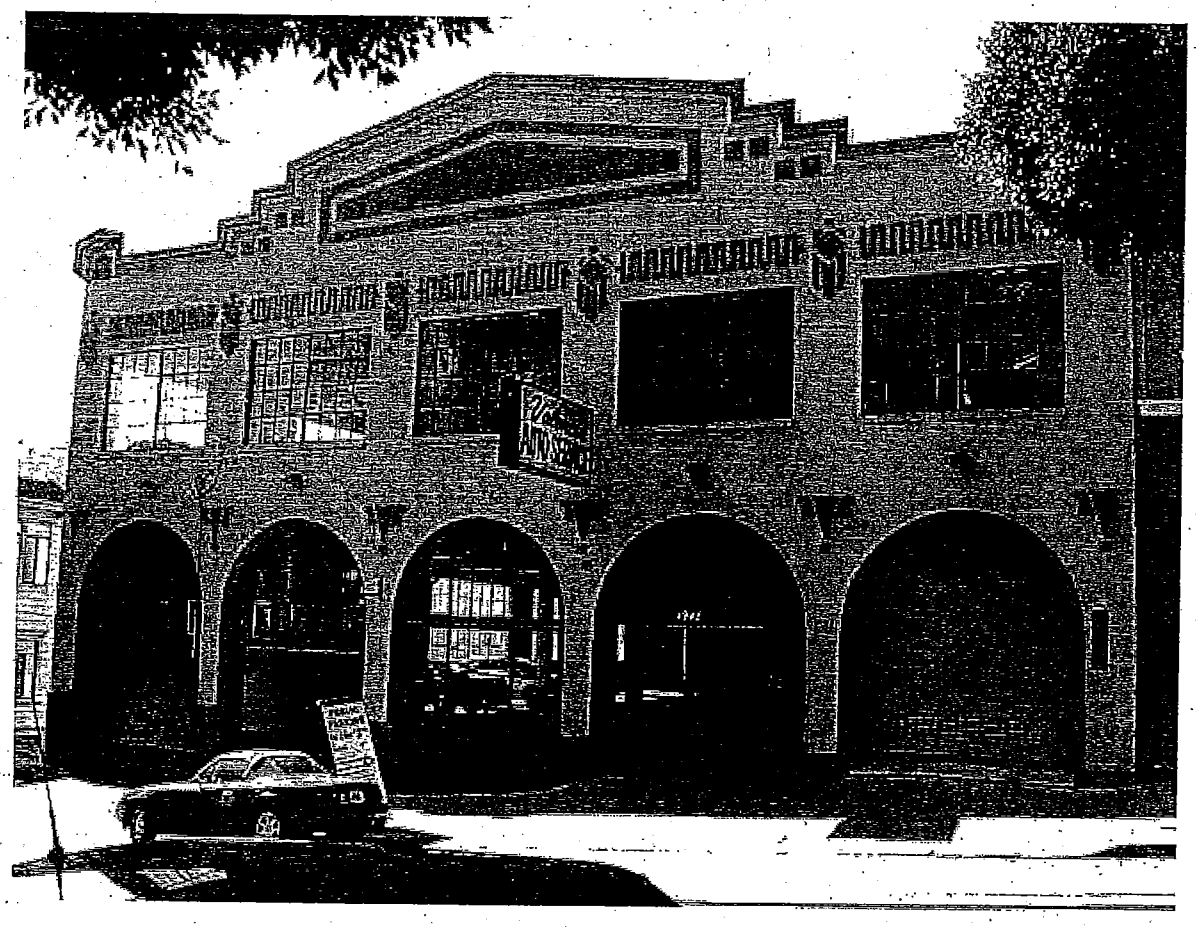


Historical Resource Evaluation

1945 Hyde Street

San Francisco, California

February, 2010



Kelley & VerPlanck

Historical Resources Consulting

2912 Diamond Street #330

San Francisco, CA 94131

415.337-5824

tim@kvpconsulting.com

TABLE OF CONTENTS

I. SUMMARY

This building appears to be an historic resource eligible for listing on the California Register. It is not located in an existing historic district but is located in a potential historic district. However, the building would not be a contributor to that potential historic district as it is out of context with the potential district's unifying theme. The proposed project complies with the Secretary of the Interior's Standards for Rehabilitation and thus would not have a negative impact on this historic resource or on the potential historic district.

II. INTRODUCTION

1945 Hyde Street is a two story over basement concrete parking garage located in the Russian Hill neighborhood on Hyde Street between Union and Green Streets. The proposed project is an adaptive reuse that would convert the underutilized parking garage to condominiums and commercial space. The project does not propose demolition of any exterior features. This report examines the property to determine if it is an historical resource; and evaluates the impact of the proposed project on historical resources.

III. CURRENT HISTORIC STATUS

The Planning Department database was searched to determine whether 1945 Hyde Street is identified in any recognized register of historical resources. The specific registers included are listed below.

A. Here Today

Here Today: San Francisco's Architectural Heritage is one of San Francisco's first architectural surveys. Undertaken by the Junior League of San Francisco and published in 1968, the survey did not assign ratings to buildings. However, the survey does provide brief historical and biographical information for what the authors believed to be significant buildings. The Board of Supervisors adopted the survey in 1970. The survey files, on file at the San Francisco Public Library's San Francisco History Room, contain information on approximately 2,500 properties. This property is not included in either the published book or the survey files.

B. Department of City Planning Architectural Quality Survey

The Department of City Planning's Architectural Quality Survey, or 1976 Survey, was a reconnaissance survey that examined the entire City of San Francisco to identify and rate, on a

scale of "0" (contextual) to "5" (extraordinary), architecturally significant buildings and structures. No historic research was performed and the potential historical significance of a resource was not considered when assigning ratings. According to the authors, the 10,000 rated buildings comprise only around 10 percent of the city's building stock. Due to its age and its lack of historical documentation, the 1976 Survey has *not* been officially recognized by the San Francisco Planning Department as a valid local register of historic resources for CEQA purposes, although it is still used on a consultative basis. This property is not included in the 1976 Survey.

C. San Francisco Architectural Heritage

San Francisco Architectural Heritage (Heritage) is the city's oldest not-for-profit organization dedicated to increasing awareness of and advocating for the preservation of San Francisco's unique architectural heritage. Heritage has completed several major architectural surveys in San Francisco, including the South of Market, the Richmond District, Chinatown, the Van Ness Corridor, the Northeast Waterfront, and Dogpatch. Heritage ratings range from "A" (highest importance) to "D" (minor or no importance) and are based on both architectural and historical significance. This building was not included in any survey conducted by Heritage.

D. California Historical Resource Status Code

Properties listed in the California Historic Resources Information System (CHRIS) or under review by the California Office of Historic Preservation (OHP) are assigned status codes of "1" to "7," establishing a baseline record of historical significance. Properties with a status code of "1" are listed in the California or National Register. Properties with a status code of "2" have been formally determined eligible for listing in the California or National Register. Properties with a status code of "3" or "4" appear to be eligible for listing in either register through survey evaluation. Properties with a status code of "5" are typically locally significant or of contextual importance. Status codes of "6" indicate that the property has been found ineligible for listing in any register and a status code of "7" indicates that the property has not yet been evaluated. No status code has been assigned to this property.

IV. DESCRIPTION

A. Site

1945 Hyde Street is located on the west side of Hyde Street between Union and Green Streets on a 6,686 sq ft lot. It is built to the lot lines. The primary façade faces east on Hyde Street and the secondary façade faces south on Russell Street. A tertiary west elevation is partially visible from Russell Street. Adjacent buildings abut the north and west sides of the subject building. The parcel slopes downward to the south on Hyde Street and downward to the west on Russell Street.

B. Exterior

This building is a two-story plus basement reinforced concrete parking garage clad in rough stucco and capped with a flat roof behind a stepped parapet. The primary façade is composed in five symmetrical bays. At ground level, each bay features a large arched opening. On the second floor above each arch is a large rectangular multi-lite steel-sash industrial window with horizontally pivoted sections. The arched openings provide separate vehicular access to each level of the building. The far right opening features a modern metal roll-up door, which leads to a concrete ramp accessing the upper floor. The central arch features a seven over seven wood sash window with an arched three by seven light wood-sash transom window. Flanking this opening are two arched openings with modern metal roll-up doors and similar multi-light wood-sash transom windows. These two openings access the ground-level parking area. The far left arch features a modern metal roll-up door with another arched multi-light wood sash transom above, and accesses a concrete ramp leading to basement level parking. Each spandrel on the primary elevation is ornamented with a triangular ornament of brick in low relief. Windowsills at the upper floor are also brick, laid in rowlock. Above the second floor windows, brick is used again in low relief to outline a dentil course punctuated by diamond and chevron motifs at each pier. The parapet is also ornamented in brick, with a molded coping, a gabled central frieze, and gabled merlons at the corners.

The secondary south façade, five bays wide, descends a full story and a half to the west and is punctuated with symmetrically placed steel-sash industrial windows on each floor. Glazing is fixed, with horizontally pivoted sections. The far left side at ground level features a wood-panel door with multi-pane sidelights and a shallow metal awning. The entrance is secured by a metal

security gate and accesses a partial sub-basement utility space. On the other floors, the western four bays contain multi-lite steel sash industrial windows, while the east corner bay, only two stories high, has a blind arch similar to those on the primary elevation ,with a multi-lite steel sash industrial window at the second story. The frieze and parapet in both end bays are ornamented as on the primary elevation, and terminated with a second gabled merlon. Windows in the end bays have brick sills, laid in rowlock.

The tertiary west elevation is visible on the upper stories above an adjacent building. This elevation is utilitarian in design, of board formed concrete, with multi-lite steel sash industrial windows at the north end of the top two stories.

C. Interior

The interior is open utilitarian parking space, with concrete slab floors, two rows of concrete posts, exposed concrete beams and joists, and board formed concrete walls. An enclosed office space of wood frame and glazing occupies the southeast corner of the ground floor. At the northwest corner is a light well and concrete stairs accessing the other levels. The concrete ramps leading from the street to upper and lower levels are enclosed by concrete walls.

V. HISTORIC CONTEXTS

A. Russian Hill

Russian Hill is one of the most architecturally heterogeneous neighborhoods in San Francisco and includes some of the oldest pre-1906 cottages, dense rows of post-quake Edwardian flats, and towering modern apartment buildings. Russian Hill has been home to such varied individuals as Swedenborgian minister Joseph Worcester, architect Willis Polk, writer Gelett Burgess, photographer Dorothea Lange, and painter and poet Maynard Dixon. All of these individuals, plus countless numbers of less prominent working-class people of many different backgrounds, have made their home on Russian Hill throughout the past century and a half.

According to the San Francisco Planning Department, Russian Hill is a roughly rectangular district comprised of more than fifty blocks in an area bounded by Van Ness Avenue to the west, Pacific Avenue to the south, Bay Street to the north and Mason Street to the east. The dominant physical feature of the neighborhood is Russian Hill itself, with a summit that rises to 360 feet at the intersection of Vallejo and Florence Streets. Russian Hill streets can be steep and the area

boasts three of the steepest blocks in the city: Filbert, between Leavenworth and Hyde; Jones, between Union and Filbert; and Jones between Green and Union. Several other blocks on Russian Hill were entirely too steep to be graded for vehicular traffic. Stairs still remain today that climb the right-of-ways along Vallejo and Green Streets, between Taylor and Jones, and Greenwich, between Hyde and Larkin. The combined effects of dead-end streets, street stairs and the traffic-diverting Broadway Tunnel have contributed to the quiet and occasionally quasi-rural atmosphere of Russian Hill.

The derivation of the name for Russian Hill is rooted in the existence of a small graveyard at the top of the hill, presumably placed there by visiting Russian sailors from Fort Ross who had lost their comrades while visiting the tiny Mexican settlement of Yerba Buena during the 1830s and 1840s. The name Russian Hill was initially applied to the entire ridge rearing up to the west of Yerba Buena Cove. Eventually Nob Hill got its own name and, thenceforth, the name Russian Hill referred to the summit located north of Pacific Avenue.

The first section of Russian Hill to be settled was the Summit, a compact two-block enclave bounded by Jones Street to the west, Green Street to the north, Taylor Street to the east and Broadway to the south. The earliest recorded property transaction for the Summit occurred during the Gold Rush. The Summit of Russian Hill contains approximately two-dozen dwellings that are some of the oldest and most significant in San Francisco.

From 1848 through the 1880s, the northernmost block of Russian Hill's Summit remained vacant, largely as a result of the sheer bluffs that cut off the block from many of the surrounding streets. The notable exception to this state of affairs was Jobson's Tower, a commercial observatory located on the block bounded by Jones, Green, Taylor and Vallejo Streets. For many years the Merchants Exchange had maintained a system of semaphores, telegraph stations and observatories at Land's End and Telegraph Hill in order to observe the arrival of ships through the Golden Gate. This advance knowledge of arrival was a substantial advantage for merchants and could often dramatically affect the price of commodities. David Jobson sought to head off the competition by constructing his own 50-foot-high observatory at the Summit of Russian Hill in 1861. When it was not under use for commercial purposes, Jobson allowed residents to scale the tower on Sundays for twenty-five cents apiece. A major storm in 1869 weakened the tower, and it was then torn down.

During the 1880s and 1890s, the Summit of Russian Hill became the birthplace of the Bay Region Tradition of architecture, a Western variant of the Eastern Shingle Style. The demolition of Jobson's Tower opened the way for development on the northernmost block of the Summit. In January 1870, David P. Marshall purchased the site of Jobson's Tower. He left the site vacant for eighteen years until 1888, when his wife, Emilie, asked her pastor, Swedenborgian minister Reverend Joseph Worcester, to design three houses for her husband's property. Worcester, one of the most influential cultural figures in late nineteenth-century San Francisco, was an amateur architect as well as a man of the cloth, and he willingly obliged Mrs. Marshall. In the process, he designed three of the most influential houses ever constructed in the Bay Area. Two of these houses at 1034 and 1036 Vallejo still exist. Although to the average passerby these houses do not appear to be that special, their impact in the 1880s was tremendous. Their simple shingled walls, minimal ornament and straightforward arrangement of openings contrasted violently with the gingerbread excess of Victorian row houses commonly built in the Victorian suburbs of the Western Addition and Mission District. Generally held to be the earliest surviving examples of the "woodsy" Bay Region Tradition, 1034 and 1036 Vallejo Street have influenced generations of later architects in search of the naturalistic and minimalist aesthetic espoused by Reverend Joseph Worcester.

Reverend Joseph Worcester was not the only cultural figure of prominence to attract a group of artistic and literary followers. Worcester's neighbor, Kate Atkinson, still lived at 1032 Broadway in the house her father had built in 1853. During the 1890s, a group of aesthetes who called themselves Les Jeunes, began meeting at Atkinson's house for late-night reveries and wine-fueled discussions. The group, which consisted at various times of Willis Polk, Gelett Burgess, Bruce Porter, Florence Lundborg and Porter Garnett, worked together to produce a literary journal called The Lark.

Willis Jefferson Polk had more to do with the existing appearance of the Summit of Russian Hill than any other architect. Polk was particularly interested in the tenets of the City Beautiful movement. Polk was responsible for several improvements on Russian Hill that helped to give the district its unique character. The most important of these are the Vallejo Street Improvements, a series of classically detailed retaining walls, balustrades and stairways designed to accommodate the steep grades of Vallejo Street between Jones and Taylor Streets. Made of unpainted concrete and erected in 1914, these improvements, albeit now graffiti-scarred, still exist close to their original condition.

The 1906 Earthquake and Fire destroyed the vast majority of Victorian San Francisco. Only a few enclaves were spared destruction within the northeastern corner of the city; Jackson Square, the crest of Telegraph Hill, a few blocks along the Waterfront and the Summit of Russian Hill. On Russian Hill, most of the block bounded by Broadway, Jones, Green and Taylor was saved, as well as the south side of Green Street between Jones and Leavenworth Streets.

Following the 1906 Earthquake and Fire, the bohemian traditions of the 1890s continued on into the twentieth century, at least on the Summit. The surrounding streets, particularly toward the south and west to Van Ness were quickly reconstructed with dense rows of wood-frame flats and apartment buildings designed in a variety of styles. Following its rapid reconstruction, the surrounding blocks filled up with working-class residents of various ethnic and religious groups and diverse trade affiliations. The higher elevations remained somewhat more desirable, resulting in the construction of more elaborate and expensive apartment buildings closer to the Summit. The majority of the apartment buildings and flats built on Russian Hill did not fit into this category. As in nearby North Beach, Russian Hill was almost entirely reconstructed within five years of the disaster. Most of the buildings that one sees standing today in the neighborhood date from the immediate post-quake reconstruction.

The 1913-15 Sanborn Map reveals that most of Russian Hill was fully reconstructed. Nothing much changed physically or socially in the neighborhood until the late 1920s, when developers began constructing several high-rise concrete apartment buildings in the area. The 1920s also witnessed the construction of a booming commercial district on Upper Polk Street. Between the late 1920s and early 1960s, Russian Hill remained largely unchanged physically. With very few exceptions, the neighborhood had long since been built out. During the Depression and the Second World War, very little new construction occurred.

The 1960s witnessed one of the greatest periods of upheaval on Russian Hill as dozens of longtime residents fought a second and much more threatening wave of high-rise development. Although a half-dozen major buildings were constructed, a major battle erupted over the proposed construction of a massive project on the block bounded by Larkin, Hyde, Chestnut and Lombard Streets in 1972. The project called for the construction of two separate high-rise apartments, one 25 stories and the other, 31 stories. After a series of protracted battles at the

San Francisco Planning Commission and the Board of Supervisors, the project was ultimately defeated and a limit of 40 feet was enacted for Russian Hill.

From the early 1970s through the early 2000s, Russian Hill has undergone relatively few physical changes. With a limit of 40 feet in place, there is not much incentive to demolish functional residential buildings that are already at this height or taller. Socially, Russian Hill remains a diverse neighborhood with a mixture of ethnic groups and income levels. Meanwhile, unlike many more transient neighborhoods, many old-timers have remained on Russian Hill, particularly at the Summit, where longtime family ownership patterns have ensured the preservation of many historic buildings and landscape features.

B. Commercial Parking Garages

With the onset of widespread automobile ownership beginning in 1910, parking became a critical issue in urban areas. It quickly became obvious that street parking could not accommodate the increasing volume of automobiles. Congestion was not relieved by residential garages, as most homes and apartment buildings did not have them. Commercial parking garages provided a simple answer to this new urban problem. In the 19th century, advancing technologies had spurred the development of new building types such as the train station and the factory, and this group expanded in the 20th century to include parking garages.[1] These garages have evolved over the last 100 years, responding to complex problems of space, height, location, design, and form.

Early garages were located in existing stables, coach houses, and liveries. Many of these buildings, however, could not be converted into a parking garages because of size and accessibility constrictions. Therefore, the demand for a new building type emerged. Early parking garage design followed established architectural language, often with ornamentation reflecting the new excitement of automobile travel. In San Francisco, many garages adopted historicist vocabularies, but their main character-defining features were prominent ground level openings and elaborate parapets. These new buildings were easily integrated into the existing urban fabric. However, the existing architectural formulas for interior spaces did not meet the new needs for storage and maintenance of these cumbersome movable machines.

[1] Shannon Sanders McDonald, *The Parking Garage: Design and Evolution of a Modern Urban Form* (Washington, D.C.: Urban Land Institute, 2007), 169.

With increasing automobile ownership came the demand for more parking space, and the 1920s ushered in the era of multi-level parking garages. However, the vertical movement of the automobile within the building was a problem. The initial solutions employed ramps, elevators, or a combination of both, in configurations that ordinary drivers could not navigate safely. But these early automobile garages were tended by parking attendants who also provided services for the maintenance and repair of vehicles. Professional parking attendants were able to maneuver the vehicles in these confined spaces.

However, as more people adopted the independence and freedom offered by automobile transportation, the demand for self-parking increased. In addition, the need for quick movement of cars became apparent; especially in locations near theaters and ballparks where simultaneous retrieval was required. Parking attendants could not keep up with the demand and elevators moved cars slowly, which resulted in inefficient service in high volume garages. Elevators were more costly and harder to maintain than ramps. So, it became clear that ramps were the preferred solution. The use of elevators decreased in popularity as designers focused on more efficient ramp designs that took up less space while maximizing available parking space. New technologies in ramp design and standardization of vehicles led to systems that could more efficiently accommodate all makes and models of cars. Standardized ramp systems were developed that could be configured in combinations that met the needs of multiple-level parking garages.

From the 1930s to the1950s, two major shifts in parking garage design emerged—the open-deck garage and the self-parking garage[2]. Self-parking garages forced designs with easy entry and exit, internal vertical circulation, user-friendly ramps, and more parking spaces.[3] While with advancements in paint and engine technologies, complete enclosure of vehicles became unnecessary as cars required less protection from the elements, leading to open-deck designs. Open-deck garages changed the design focus to a more functional and practical approach with less attention to architectural integration with the neighborhood.

As the modern parking garage took shape it became a common and ubiquitous building type. Garages were needed for the workplace, retail, hotel and casino parking, public parking for

[2] McDonald, *The Parking Garage*, 40.
[3] Ibid.

airports and hospitals, and municipal storage. Often these needs dictated where the structures were located, and location dictated design. With a more economical and utilitarian approach to design less importance was placed on architectural embellishment. Parking garages symbolized modernity, causing designers to question the use of beaux-arts styles.[4]

In Europe, the "honest" building design was a popular modernist approach, which prized "structures that openly revealed their internal functions and purposes, and required no ornamentation other than what was inherent in the materials used to construct them."[5] For parking garages, this "honest" approach resulted in structures with large, bulky, concrete posts and slabs, visually unappealing and often incompatible with surrounding buildings. The emergence of underground parking has reduced some of the negative impact garages have on the built environment. Overall, parking garages have gained a negative aesthetic reputation and exciting modern designs have often been overlooked, though today, a more sensitive approach to parking garage design has returned. This new approach, however, has had limited impact on the overall appreciation of the building form. Older garages such as the subject building, while retaining architectural appeal, have become less viable economically.

C. August G. Headman

August G. Headman had a brief but prolific career as an architect practicing in San Francisco. He designed in a wide range of styles and building types. Headman was born in Roseburg, Oregon and moved to San Francisco as a child. Headman was educated in San Francisco public schools and later worked as a draftsman for several prominent San Francisco firms while attending evening classes at Hopkins Art Institute, the Mechanics Institute, and the Humboldt Evening Technical School.[6] Headman founded the San Francisco Architectural Club in 1901 which provided architectural training to draftsman. In 1907, he graduated from the University of Pennsylvania Department of Architecture and moved to Paris to supplement his training at Ecole des Beaux-Arts in Paris. However, he did not graduate from Ecole des Beaux-Arts for reasons unknown. Returning to San Francisco in 1909, Headman partnered with Perseo Righetti until 1914 when he began his own practice. Headman died in 1925 following an extended illness due to an earlier operation. Some notable buildings designed by Headman

[4] Ibid., 197.
[5] Ibid.
[6] David Parry, "Pacific Heights Architects #29 – August G. Headman," Internet. Accessed from http://www.classicsfproperties.com/Architecture/AugustGHeadman.htm

include: Native Sons of the Golden Gate 414 Mason Street (1909), Spring Valley School 1451 Jackson Street (1919), and 2525 – 2637 Lyon Street (1924).

VI. PROJECT SITE HISTORY

A. Sanborn Maps

The first Sanborn Map showing the subject block was published in 1886 (**Figure 1**). At this time, the Russian Hill neighborhood was in its' early stages of development, which is reflected in the Sanborn map showing the subject block and surrounding blocks. These blocks show a modest development with mostly one to two-story single-family homes and commercial buildings concentrated on Hyde Street. The project site then contained a bakery and three small dwellings.

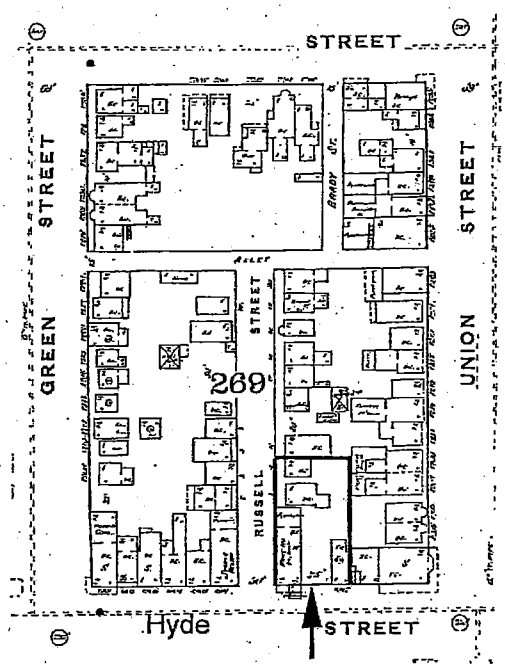


Figure 1. 1886 Sanborn Map with the approximate location of the subject parcel noted with arrow.

By 1899, the Sanborn Map shows the subject block now fully developed, with this site containing the bakery and four frame dwellings. **(Figure 2).** The surrounding blocks also appear to be similar with the exception of a few newly constructed single-family homes.

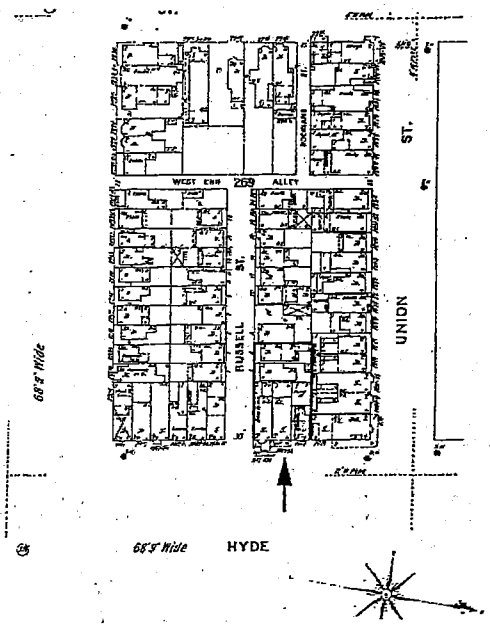


Figure 2. 1899 Sanborn Map with the approximate location of the subject property noted with arrow

The 1906 Earthquake and Fire destroyed most of Russian Hill with the exception of a small portion located one block to the west of the subject block. The 1913 Sanborn Map illustrates the quick recovery of the subject block with this site being one of the very few vacant parcels **(Figure 3).** The previous pattern of a majority of single-family homes was not continued as more multiple-family homes were reconstructed. The block to the south reconstructed quickly as well, while the blocks to the east were sparsely redeveloped. The commercial buildings continued to be located on Hyde Street.

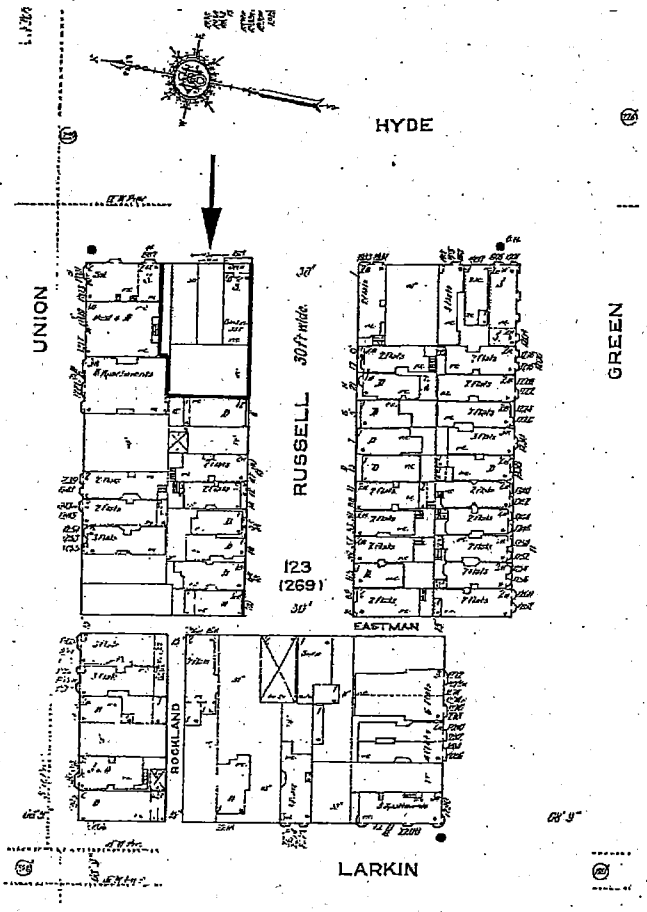


Figure 3. 1913 Sanborn Map with the approximate location subject parcel noted with arrow

1945 Hyde Street was constructed in 1920. Approximately 120 garages were listed in the San Francisco City Directory that year.[7] Atlas Garage at 1444 Green Street (one block west) was the nearest garage to the subject building. By 1928, 300 garages were listed in the City directory and roughly half still exist.[8] The 1950 Sanborn Map shows the surrounding neighborhood almost completely developed **(Figure 4).** The surrounding blocks were reconstructed with a higher concentration of apartment buildings and multiple-family buildings and far fewer single-family homes.

[7] *Crocker-Langley San Francisco City Directory 1920,* (San Francisco: H.S. Crocker Co., Inc., 1920).
[8] Mark Kessler, "Educate, Preserve, Reuse: The Good (Not Great) Garage Buildings of San Francisco," University of California, Davis AIA Report on University Research. Presented to the San Francisco Department of Planning, December 11, 2008.

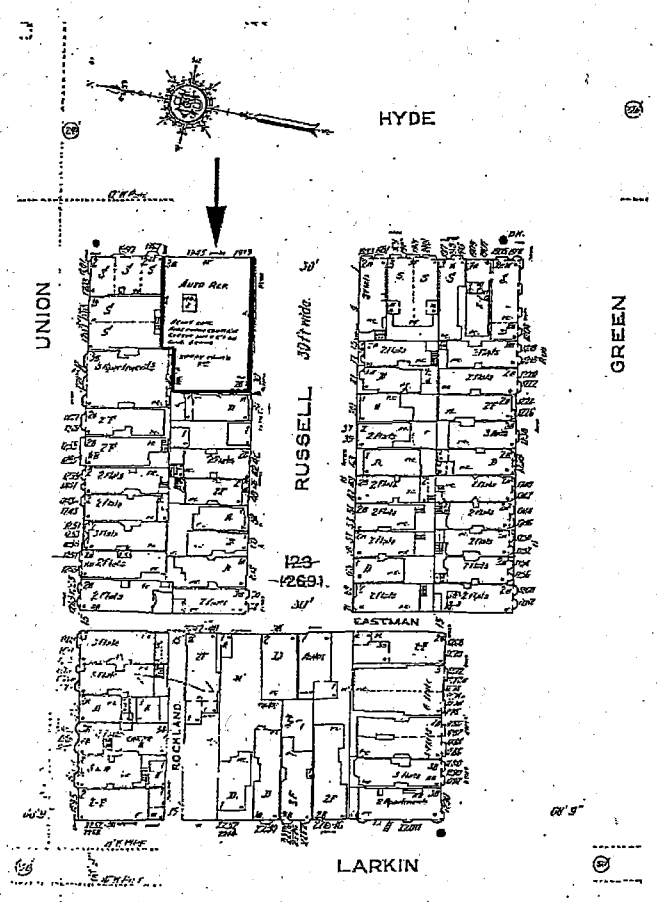


Figure 4. 1950 Sanborn Map with 1945 Hyde Street noted with arrow

B. Construction Chronology

1945 Hyde Street was constructed in 1920 for the P. Micheletti estate and designed by August G. Headman. The building has sustained very few exterior alterations. Modern metal rollup doors were installed at an unknown date and in approximately 1960 the secondary western façade entrance was altered to accommodate a commercial furniture repair shop. It is unknown how this entrance appeared originally. On the primary façade on the far right opening, it appears that multi-light wood-sash transom windows similar to the windows in the other arched openings may have been removed.

C. Permit Record

No permits were found pertaining to any exterior or interior alterations. The following permits are on file at Department of Building Inspection (DBI):

Dec. 20, 1937 Erect neon electric sign

Nov. 26, 1940	Double face standard "76" sign
June 8, 1941	Sign permit
Aug. 20, 1963	Replacing sign on existing irons
March 14, 1973	Sign permit
May 15, 2007	Reroof

D. Owners and Occupants

Prior to construction of this building, the subject parcel was divided into five smaller parcels. The parcels contained three commercial buildings facing Hyde Street and two single-family homes facing Russell Street. The parcels were owned by three separate owners; Charles Moeller, Joseph Mulhall, and P. Micheletti. Eventually the estate of P. Micheletti purchased the two smaller parcels facing Russell Street. These parcels were officially merged in 1940. This building was constructed in 1920 filling all five parcels and was leased to Reuben Hoyle. The building has continued in use as parking garage and maintenance and repair shop with several different name changes; Reuben Hoyle (1920-1937), Hoyle & Meade (1937-1940), Hyde Union Garage (1941-1952), Royce Garage (1953-54), Dan's Auto Repair and Right Way Auto Garage No. 2 (1955-1958), Dan's Auto Repair and Jayne Garage (1959-1962), Jayne Garage and Auto Repair (1963-1964), Hyde Street Garage (1966-1967), and Valencia Auto Service (1968 through 1982). From 1960 through 1982, Andersen's Furniture Refinishing operated out of a small area in the basement facing Russell Street. The building is currently in use as a parking garage with no automobile repair services.

Subsequent owners (dates of ownership) include: George S. & Helen H. Daniels (1947-1953), Weinsteins (1953-1954), Robert B. Keast (1954-1956), Lai Hung Ng & Willie May (1956-1958), Lai Hung Ng & Gee Goon Chin (1958-1966), Edward & Elizabeth Tom, Edward & Priscilla Fong, Hank & Frances Nogewa, Chong M Fong (1966-2007), SF Properties LLC (current)

VII. EVALUATION OF HISTORIC STATUS

The subject property was evaluated to determine if it was eligible for listing in the California Register of Historical Resources, either individually or as a contributor to a historic district. The California Register is an authoritative guide to significant architectural, archaeological and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-eligible

properties (both listed and formal determinations of eligibility) are automatically listed. Properties can also be nominated to the California Register by local governments, private organizations or citizens. This includes properties identified in historical resource surveys with Status Codes of 1 to 5 and resources designated as local landmarks or listed by city or county ordinance. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed for use by the National Park Service for the National Register. In order to be eligible for listing in the California Register a property must be demonstrated to be significant under one or more of the following criteria:

> *Criterion 1 (Event):* Resources that are 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.
>
> *Criterion 2 (Person):* Resources that are associated with the lives of persons important to local, California, or national history.
>
> *Criterion 3 (Architecture):* Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.
>
> *Criterion 4 (Information Potential):* Resources or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California or the nation.

The following section examines the eligibility of the subject property for listing in the California Register under those criteria.

A. Individual Eligibility

- Criterion 1 (Events)

This building is associated with the evolution and development of a new 20th century building type, parking garages. The development and design of parking garages reflects the shift in the public transportation from horse drawn to automobile. The built environment changed with the addition of this new building type. With evolution of new technologies in construction, engineering, design, and automobile production, each decade of parking garage design varied. The 1920s era of parking garage design was a pivotal period in the design's evolution due to the increasing pressures of self-parking and experimentation with the use of ramps or elevators for vertical movement of the vehicles. Garage design still followed the accepted exterior architectural language while experimenting with interior space. This building reflects this design period through its use of traditional architectural expression and use of ramps for movement.

However, it does not appear the building is a particularly important expression of this pattern of events. Thus, it does not appear eligible for listing in the California Register under Criterion 1.

- Criterion 2 (Persons)

This building is not associated with any significant persons in the history of San Francisco or the state of California. This building is not eligible for listing in the California Register under Criterion 2.

- Criterion 3 (Architecture)

This building embodies the distinctive characteristics of a type—a 1920 ramped parking garage with an architecturally embellished exterior. It was designed in a mix of Mission Revival and Secessionist styles. Although not a classical design similar to the surrounding Classical Revival apartment buildings; the building still exhibits an order and symmetry intended to blend well with the existing buildings. After the 1920s, parking garage design moved away from the visually contextual design influence to a more functional and practical design that did not necessarily blend with its surroundings. Because it embodies the distinctive characteristics of its type, the building is eligible for listing in the California Register under Criterion 3.

- Criterion 4 (Information Potential)

This criterion ordinarily refers to potential archeological value. The property does not appear eligible for listing on the California Register under Criterion 4.

B. District

A property may also become eligible for listing on the California Register as a contributor to a historic district. Guidelines define a district as an area that "possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." To be listed on the California Register, the district itself must be eligible under the criteria already discussed. The documentation of the district must enumerate all properties within it, identifying each as a contributor or non-contributor. The district itself, as well as each of its contributors, then become historical resources.

The area in which the subject property is located is not currently identified as a district. For purposes of this report, a small portion of the surrounding area was visually examined to determine if a potential district could be identified. The area examined includes the east and

west side of Hyde Street between Union and Green Streets consisting of twelve buildings, and all of Russell Street consisting of seventeen buildings. In total, the area contains twenty-nine single-family, multiple-family, and residential over commercial buildings constructed between 1905 and 1923, all frame construction. **(Appendix)**. The architectural styles include: Classical Revival, Mission Revival, Flat-Front Italianate and Vernacular. The buildings range in height from one to three-stories. This block face contains a high concentration of residential buildings constructed in the early years of reconstruction after the 1906 Earthquake and Fire. The surrounding blocks may also contain buildings that fit into a narrow period of development as much of Russian Hill was destroyed by fire. The buildings contained within this area are unified historically by theme and form, and therefore could be a potential district. However, the subject building would not contribute to this district due to dissimilarity of scale, materials, form, and building type.

VIII. INTEGRITY

In addition to being determined eligible under at least one of the four California Register criteria, a property deemed to be significant must also retain sufficient historical integrity. The concept of integrity is essential to identifying the important physical characteristics of historical resources and hence, evaluating adverse change. For the purposes of the California Register, integrity is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (California Code of Regulations Title 14, Chapter 11.5). A property is examined for seven variables or aspects that together comprise integrity. These aspects, which are based closely on the National Register, are location, design, setting, materials, workmanship, feeling and association. *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation* defines these seven characteristics:

- *Location* is the place where the historic property was constructed.
- *Design* is the combination of elements that create the form, plans, space, structure and style of the property.
- *Setting* addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building/s.
- *Materials* refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property.

- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history.
- *Feeling* is the property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.

According to *California Office of Historic Preservation Technical Assistance Series #6, "California Register and National Register: A Comparison:"*

> It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant or historical information or specific data.

Thus, the California Register may include properties that have suffered a greater degree of damage to their integrity than would be acceptable for listing in the National Register.

1945 Hyde Street retains integrity of location, design, setting, materials, workmanship, feeling and association.

IX. CONTEXT & RELATIONSHIP

As reported above, this building is located in an area containing twenty-nine residential and commercial buildings constructed between 1905 and 1923. These buildings are associated with the early reconstruction years following the 1906 Earthquake and Fire. However, the subject property is associated with a building pattern connected to the evolution of the automobile not the reconstruction period.

X. EVALUATION OF PROJECT SPECIFIC IMPACTS UNDER CEQA

This section analyzes the project specific impacts of the proposed project on the environment as required by CEQA.

A. Status of Existing Building as a Historical Resource

1945 Hyde Street is not currently listed as an historic resource but appears eligible for listing in the California Register under Criterion 3.

B. Proposed Project

The proposed project includes the following alterations:

1. Conversion of the second floor and rear portions of the ground floor to condominiums
2. Conversion of the ground floor front to commercial space
3. Insertion of a pedestrian entrance to the residential spaces in the northern arch on Hyde Street
4. Infill of the remaining arches with compatible glazing and a retail entrance
5. Conversion of the blind arch in the first Russell Street bay to a window
6. Conversion of one of the ground floor windows on Russell Street to a vehicular entrance
7. Addition of a penthouse structure set back 12+ feet from the Hyde Street elevation and within the Russell Street parapet
8. Replacement of non-repairable windows with visually identical units[9]

C. Evaluation of Significant Adverse Change under CEQA

According to CEQA, a "project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment."[10] Substantial adverse change is defined as: "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired."[11] The significance of an 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, the California Register.[12] Since this building appears to be eligible for inclusion in the California Register, the following section analyzes the potential impact of the proposed project on it and on the adjacent potential historic district.

D. Analysis of Project Specific Impacts under CEQA

[9] A complete survey of the existing windows has been conducted and is attached.
[10] CEQA Guidelines subsection 15064.5(b).
[11] CEQA Guidelines subsection 15064.5(b)(1).
[12] CEQA Guidelines subsection 15064.5(b)(2).

The following section analyzes the proposed rehabilitation scheme developed by the project architect, Ogrydziak/Prillinger Architects, in drawings dated December 11, 2009, according to the Secretary of the Interior's Standards. The Standards provide guidance for reviewing proposed work on historic properties.[13] The Standards are used by Federal agencies in evaluating work on historic properties. Local government bodies have also adopted the Standards across the country (including the San Francisco Historic Preservation Commission) for reviewing proposed rehabilitation work to historic properties under local preservation ordinances. According to the Standards, "The treatment 'rehabilitation' assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy materials, features or finishes that are important in defining the building's historic character."[14] The Standards are a useful analytical tool to determine the appropriateness of a proposed project on a historic resource. With regards to alterations/additions, the Standards make the following recommendation, "Some exterior and interior alterations to the historic building are generally needed to assure its continued use, but it is most important that such alterations do not radically change, obscure, or destroy character-defining spaces, materials, features, or finishes."[15]

The following analysis applies each of the Standards to the proposed project.

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

The proposed project complies with Standard 1 because the property will be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

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[13] Morton, W. Brown III, Gary L. Hume, Kay D. Weeks, and H. Ward Jandl, *Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines for Rehabilitating Historic Buildings* (Washington, D.C.: U.S. Department of the Interior, National Park Service, Cultural Resources, Preservation Assistance Division, 1992). The *Standards*, revised in 1992, were codified as 36 CFR Part 68.3 in the July 12, 1995 Federal Register (Vol. 60, No. 133). The revision replaces the 1978 and 1983 versions of 36 CFR 68 entitled *The Secretary of the Interior's Standards for Historic Preservation Projects*. The 36 CFR 68.3 *Standards* are applied to all grant-in-aid development projects assisted through the National Historic Preservation Fund. Another set of *Standards*, 36 CFR 67.7, focuses on "certified historic structures" as defined by the IRS Code of 1986. *The Standards* in 36 CFR 67.7 are used primarily when property owners are seeking certification for Federal tax benefits. The two sets of *Standards* vary slightly, but the differences are primarily technical and are not substantive in nature. The *Guidelines*, however, are not codified in the Federal Register.

[14] Ibid, 7.

[15] *Secretary of the Interior's Standards for Rehabilitation*, 10.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

The proposed project will retain all of the historic characteristics of the property, which include its visible massing from the street, character defining features such as the parapets, decorative brick detailing, and arched openings, and overall spatial relationship to adjacent buildings and the surrounding neighborhood.

The project proposes to add a penthouse to the building. However, this new addition will be set back from the existing front and rear building elevations, reducing its visual impact at street-level. Additionally, the penthouse is partially blocked by the primary façade parapet. The overall massing of the building will be retained.

In summary, the proposed project complies with Standard 2.

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 elements from other historic properties, will not be undertaken.

The proposed exterior rehabilitation complies with Standard 3 because no conjectural features or elements from other historic properties will be added.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

The proposed project complies with Standard 4 because the project will not affect alterations to the property that have acquired historic significance.

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

The proposed project complies with Standard 5 because, other than replacement of the windows as discussed below, it will not remove distinctive materials, features, finishes, or construction techniques, or examples of craftsmanship that characterize the property. Briefly, the interiors will be modified in order to provide an efficient contemporary use for the building. Therefore, the changes required in the interior comply with the overall intent of the rehabilitation guidelines.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

The existing steel-sash industrial windows will be replaced due to extensive deterioration and distortion of the steel sash. A condition survey of all existing windows has been conducted and is attached. It reveals overall heavy corrosion, deterioration, and distortion, as well as separation of the frames from the concrete openings. The project proposes to replace them with new windows that replicate the existing sash profile and glazing pattern. Since the result will be visually identical to the existing windows, it will comply with Standard #6.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The proposed project complies with Standard 7 because neither chemical nor physical treatments are proposed.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

The proposed project complies with Standard 8. There are no known prehistoric or historic archaeological sites in the vicinity. Furthermore, excavation required to build the existing structure would have likely removed any subsurface objects.

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.

The proposed project is in compliance with Standard 9. The new penthouse is set back 12+' from the front and rear elevations, and is within the parapet on the Russell elevation.. With the setback and screening provided by the parapet, the visual impact of the additional story will be minimal from Hyde Street. The new penthouse will be differentiated from the old and as stated above in Standard 2, the massing of the new addition has been designed in order to maintain the integrity of the property and its environment.

The project also proposes to convert two of the arched door openings on the Hyde elevation to windows by infilling the bottom portions. In addition, one basement window on Russell Street

would be converted to a vehicular entrance and a blind arch on Russell Street would be glazed. This would involve removal of the existing steel window and portions of the concrete wall. These alterations are on a secondary elevation, leave the historic fenestration pattern essentially in place, and do not destroy character defining historic materials, features, or spatial relationships. Thus, the project would comply with Standard #9.

10. New additions and adjacent or related new construction will 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.

While it is unlikely that this would occur, it would be possible to remove the proposed penthouse. As such, the proposed project does comply with Standard 10.

Rehabilitation is defined as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."[16] In summary, the proposed project appears to comply with the Secretary of the Interior's Standards for Rehabilitation.

E. Analysis of Cumulative Impacts under CEQA

The subject property is located in a potential historic district composed of residential buildings constructed during the early years after the 1906 Earthquake. The property itself is not a contributor to that potential district, and the proposed project complies with the Secretary of the Interior's Standards for Rehabilitation. No other nearby buildings match the scale and massing of this building. It is therefore unlikely that similar projects would be proposed in the foreseeable future.

XI. CONCLUSION

1945 Hyde Street is eligible for listing in the California Register as a locally significant 1920s era parking garage. The proposed project was designed as an adaptive reuse project that minimally impacts the building and the surrounding buildings. The character-defining features of the building will be retained. The proposed vertical addition was designed for minimal visual impact from the street and in combination with the retention of the building's character-defining

[16] Kay D. Weeks and Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Washington, D.C.: National Park Service, 1995), 61.

features; this project does not negatively impact the significance of the building itself, nor that of the potential historic district.

XII. BIBLIOGRAPHY

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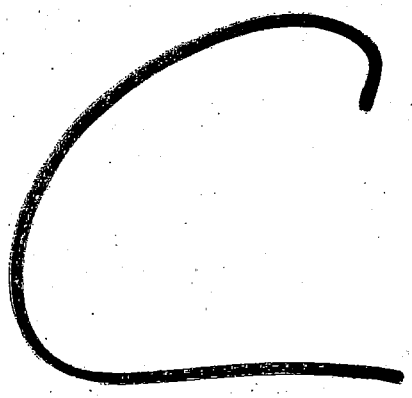

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

Historic Resource Evaluation Response

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

MEA Planner:	Chelsea Fordham
Project Address:	**1945 Hyde**
Block/Lot:	0123/002
Case No.:	**2010.0162E**
Date of Review:	July 8, 2010
Planning Dept. Reviewer:	Moses Corrette
	(415) 558-6295 | Moses.Corrette@sfgov.org

PROPOSED PROJECT ☐ Demolition ☒ Alteration

PROJECT DESCRIPTION

The proposed project is the adaptive reuse of a 2-story over basement, existing concrete parking garage containing 58 spaces to a 3-story over basement, 7 unit residential project, including 15 parking spaces provided by 7 stackers and 1 car share space, and 1 commercial space of approximately 860 sf.

Specifically, the project includes the following alterations: Conversion of the ground floor front to commercial use; the second floor, and rear portion of the ground floor to residential condominiums; insertion of a pedestrian entrance to the residential spaces in the northern arch on Hyde St; infill of the remaining arches with compatible glazing and a retail entrance; conversion of the blind arch in the first Russell St bay to a window; conversion of one of the ground floor windows no Russell St to a vehicular entrance; addition of a penthouse structure set back 12+ feet from the Hyde St elevation and within the Russell St parapet; replacement of non-repairable windows with visually identical units[1].

PRE-EXISTING HISTORIC RATING / SURVEY

The subject property has no prior survey ratings. The building is considered a "Category B" (Potential Historic Resource) property for the purposes of the Planning Department's California Environmental Quality Act (CEQA) review procedures.

HISTORIC DISTRICT / NEIGHBORHOOD CONTEXT

The parcel is located on a slightly irregular-shaped lot on the west side of Hyde Street, north of Russell Street, between Union and Green Streets in the Russian Hill neighborhood. The property is located within a NC-1 (Neighborhood Commercial Cluster District) Zoning District and a 40 -X Height and Bulk District. The immediate area consists of single and multi-family homes, mixed-use and single-story commercial buildings constructed primarily between 1906 and 1920. Russell Street to the west is predominately lined with smaller scale single-family dwellings constructed between 1906 and 1908. Roughly half of those buildings are listed in the 1976 Architectural Survey or the Here Today Survey.

[1] A complete survey of the existing windows has been conducted and is in the case docket 2010.0162E.

1. **California Register Criteria of Significance:** Note, a building may be an historical resource if it meets any of the California Register criteria listed below. If more information is needed to make such a determination please specify what information is needed. *(This determination for California Register Eligibility is made based on existing data and research provided to the Planning Department by the above named preparer / consultant and other parties. Key pages of report and a photograph of the subject building are attached.)*

Event: or ☐ Yes ☒ No ☐ Unable to determine
Persons: or ☐ Yes ☒ No ☐ Unable to determine
Architecture: or ☒ Yes ☐ No ☐ Unable to determine
Information Potential: ☐ Further investigation recommended.
District or Context: ☒ Yes, may contribute to a potential district or significant context
If Yes; Period of significance: This building may contribute to a significant context of neighborhood-serving automobile parking garages from the first half of the 20th century. The garages would store private automobiles, and provide basic maintenance services. In the case of 1945 Hyde Street, the surrounding blocks of Russian Hill were served.

The Planning Department concurs with the findings of California Register eligibility as documented in the Kelley & VerPlanck report submitted by the project sponsor, specifically for the Criteria 1, 2 and 3:

Criterion 1: It 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;
"This building is associated with the evolution and development of a new 20th century building type, parking garages. The development and design of parking garages reflects the shift in the public transportation from horse drawn to automobile. The built environment changed with the addition of this new building type. With the evolution of new technologies in construction, engineering, design, and automobile production, each decade of parking garage design varied. The 1920s era of parking garage design was a pivotal period in the design's evolution due to the increasing pressures of self-parking and experimentation with the use of ramps or elevators for vertical movement of the vehicles. Garage design still followed accepted exterior architectural language while experimenting with interior space. This building reflects this design period through its use of traditional architectural expression and use of ramps for movement. However, it does not appear that this building is a particularly important expression of this pattern of events. Thus, it does not appear eligible for listing in the California Register under Criterion 1."[2]

As a member of a class of buildings in a significant context of neighborhood-serving automobile parking garages, the property type came into existence as a result of the needs of the district's residents and because most homes and apartment buildings did not have residential garages.

[2] Kelley & VerPlanck Historic Resources Consulting, Historical Resource Evaluation 1945 Hyde Street San Francisco California, February 2010, p18

Criterion 2: It is associated with the lives of persons important in our local, regional or national past;
The subject property is associated with Reuben Hoyle (first lessee); owners: George S. & Helen Daniels (1947-1953), Weinsteins (1953-1954), Robert B. Keast (1954-1956), Lai Hung Ng & Willie May (1956-1958), Lai Hung Ng & Gee Goon Chin (1958-1966), Edward & Elizabeth Tom, Edward and Priscilla Fong, Hank & Frances Nogewa, Chong M. Fong (1966-2007) ; however, none of these individuals seem to have made significant contributions to San Francisco or California history that would qualify this building for listing per Criterion 2.

The building at 1945 Hyde Street has an indirect association with Carolyn and Neal Cassady, their home across Russell Street, at number 29 is also associated with the Beat poet Jack Kerouac who lived with the couple in ménage trios. This building provided the backdrop of a well known photograph of the two men c. 1952 depicting the pair against the concrete wall, with the steel window in the basement as the sole identifying element of the building in the photo. This indirect association does not qualify this building for listing on the California Register per Criterion 2.

Criterion 3: It 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;
"This building embodies the distinctive characteristics of a type – a 1920 ramped parking garage with an architecturally embellished exterior. It was designed in the mission Revival and Secessionist styles. Although not a classical design similar to the surrounding Classical Revival apartment buildings, the building still exhibits an order and symmetry intended to blend well with the existing buildings. After the 1920s, parking garage design moved away from the visually contextual design influence to a more functional and practical design that did not necessarily blend with its surroundings. Because it embodies the distinctive characteristics of its type, the building is eligible for listing in the California Register under Criterion 3."[3]

Criterion 4: It yields, or may be likely to yield, information important in prehistory or history;
It does not appear that the subject property is likely to yield information important to a better understanding of prehistory or history.

---

2. **Integrity** is the ability of a property to convey its significance. To be a resource for the purposes of CEQA, a property must not only be shown to be significant under the California Register criteria, but it also must have integrity. To retain historic integrity a property will always possess several, and usually most, of the aspects. The subject property has retained or lacks integrity from the period of significance noted above:

Location:	☒ Retains	☐ Lacks	**Setting:**	☒ Retains	☐ Lacks
Association:	☒ Retains	☐ Lacks	**Feeling:**	☒ Retains	☐ Lacks
Design:	☒ Retains	☐ Lacks	**Materials:**	☒ Retains	☐ Lacks
Workmanship:	☒ Retains	☐ Lacks			

[3] *ibid*

3. **Determination of whether the property is an "historical resource" for purposes of CEQA.**

☐ No Resource Present *(Go to 6 below.)* ☒ Historical Resource Present *(Continue to 4.)*

4. **If the property appears to be an historical resource, whether the proposed project would materially impair the resource (i.e. alter in an adverse manner those physical characteristics which justify the property's inclusion in any registry to which it belongs).**

☒ The project will not cause a substantial adverse change in the significance of the resource such that the significance of the resource would be materially impaired. *(Continue to 5 if the project is an alteration.)*

☐ The project is a significant impact as proposed. *(Continue to 5 if the project is an alteration.)*

Staff has reviewed the project proposal and largely concurs with Kelley & VerPlanck's Secretary of the Interior Standards for Rehabilitation (Standards) analysis (see pages 22-25 of the submitted historic Resource Evaluation (HRE)). Based upon this analysis, staff finds that the project would not cause a substantial adverse change in the resource such that the significance of the building would be materially impaired. The following is an analysis of the proposed project impacts to the historic resource.

- The proposed project would retain the physical structure, but not use, of the historic automobile garage at the site.
- The new use will require minimal changes to the building's distinctive materials, features, spaces, and spatial relationships.
- The proposed new penthouse would be designed in a contemporary style that uses a simple vocabulary in order to create compatible design that is distinguishable as a new feature within the site. The penthouse would rise approximately 7 feet above the parapet height on the Russell Street elevation; a roof terrace with 42" clear glass railing would be set back approximately 15 feet from the building wall, which would not be visable from Russell Street.
- The new floor could be removed entirely in the future without harming the historic integrity of the building.
- The Steel window at the basement level of the Russell Street elevation which can be seen in the c. 1952 photograph of Jack Kerouac and Neal Cassady will be retained and rehabilitated. The remaining existing steel sash industrial windows will be replaced due to extensive deterioration and distortion of the steel sash. A condition survey of all existing windows has been conducted and is available in the case docket. It reveals overall heavy corrosion, deterioration, and distortion, as well as separation of the frames from the concrete openings. The project proposes to replace them with new windows that replicate the existing sash profile and glazing pattern.

5. **Character-defining features of the building to be retained or respected in order to avoid a significant adverse effect by the project, presently or cumulatively, as modifications to the project to reduce or avoid impacts. Please recommend conditions of approval that may be desirable to mitigate the project's adverse effects.**

The character-defining features of the property include its visible massing from Hyde Street, parapets, decorative brick detailing, and arched openings, large industrial sash windows, and overall spatial relationship to adjacent buildings and the surrounding neighborhood. The Steel window at the basement level of the Russell Street elevation which can be seen in the c. 1952 photograph of Jack Kerouac and Neal Cassady will be retained and rehabilitated.

6. **Whether the proposed project may have an adverse effect on off-site historical resources, such as adjacent historic properties.**

☐ Yes ☒ No ☐ Unable to determine

Russell Street to the south and west of the subject property is a potential historic district of small scale residential buildings built between 1906 and 1908, with two buildings from the 1910s that together could be eligible for listing on the California Register. Several buildings are listed on the 1976 Architectural Survey, and the Here Today survey, and are presumed to be historic resources. The proposed project is adjacent to the potential district within a building that is of a vastly different type, period, and method of construction, and could not be part of that architectural context. The building is of a larger scale than the adjacent Russell Street buildings, however, 1945 Hyde has been part of the fabric of the neighborhood for 90 years, as it has served as a community parking garage for several decades. The proposed alterations to the building would be minimally visible and, while an incremental change to the setting of Russell Street, the rehabilitation and addition would not have a significant adverse effect on the integrity of the adjacent resources.

PRESERVATION COORDINATOR REVIEW

Signature: Sophie Hayward Date: 07.08.2010

Sophie Middlebrook Hayward, *acting Preservation Coordinatori*
Tina Tam, *Preservation Coordinator*

cc: Linda Avery, *Recording Secretary*, Historic Preservation Commission
Virnaliza Byrd / Historic Resource Impact Review File

Attachments: Historic Resource Evaluation Report prepared by Kelley & VerPlanck and dated February, 2010.

I:\Cases\2010\2010.0162\2010.0162E\2010-0162E.doc

Fw: Scheduling 1945 Hyde Street:Appeal of Determination of Exemption 9/13?

Rick Caldeira to: Joy Lamug 07/26/2011 09:21 AM

file

---- Forwarded by Rick Caldeira/BOS/SFGOV on 07/26/2011 09:21 AM ----

From:	John Parker Willis <johnparkerwillis@mac.com>
To:	Catherine.Rauschuber@sfgov.org
Cc:	AnMarie.Rodgers@sfgov.org, "Steven L. Vettel" <svettel@fbm.com>, Rick.Caldeira@sfgov.org
Date:	07/25/2011 01:02 PM
Subject:	Re: Scheduling 1945 Hyde Street:Appeal of Determination of Exemption 9/13?

I would like the matter to be heard as scheduled for August 2. I understand the Planning Staff has already prepared a draft of its response.

Thank you.

John Willis

GREEN GARAGE LLC
JOHN PARKER WILLIS, MANAGER
3298 PIERCE STREET
SAN FRANCISCO, CA 94123

C 415 -710-4921
O 415 - 474-8600 ex 10
F 415 -474-8696

On Jul 25, 2011, at 12:46 PM, Catherine.Rauschuber@sfgov.org wrote:

> All,
>
> The appellant is requesting that 1945 Hyde Street appeal be heard on September 13th. Is this doable for the project sponsor and Planning Department?
>
> Thanks,
> Catherine
>
> Catherine Rauschuber
> Office of Supervisor David Chiu
> President, San Francisco Board of Supervisors
> City Hall, Room 264
> San Francisco, CA 94102
> phone: (415) 554-7453
> fax: (415) 554-7454
>
> **From:** Jamie Cherry <jcherry@rhcasf.com>
> **Date:** July 21, 2011 11:36:54 AM PDT
> **To:** Catherine.Rauschuber@sfgov.org
> **Subject: Re: Ext. Request :Appeal of Determination of Exemption from Environmental Review for 1945 Hyde Street**

Hi Catherine,

Thanks so much for letting us know the Board of Supervisors are on recess in August, we didn't realize that. Also, in looking at the calendar, I see that Sept 6th is the day after the Labor Day Holiday; if that is the case and to ensure the Planning Commission and Zoning Administrator decisions have been published, and that the board has had time to review all the materials, should we schedule the hearing for Sept. 13th???

We would not want the supervisors to return from recess and not have had proper time to review all materials and most likely between the August recess and labor day holiday there won't be much time for them to come up to speed and get familiar with the project. (Note that the City Attorney requires materials 8 days before the hearing -- 8 days prior to Sept 6th is August 24th, which is mid-recess. 8 days prior to Sept 13th is Sept 1st and would give the Supervisors the week after the labor day holiday to review the case.)

Can we calendar it for Tuesday Sept. 13th?

Thanks,

Jamie

Jamie Cherry
Chair, 1945 Hyde Street Project Team
Russian Hill Community Association

On Jul 21, 2011, at 12:25 AM, Catherine.Rauschuber@sfgov.org wrote:

Hi Jamie,

Thank you for the email. The Board of Supervisors is actually on recess during almost the entire month of August, so the first possible Board meeting for the continuance would be September 6th, which is the first meeting after August 2. Would September 6 be amendable to you? I have heard that both Planning and the project sponsor are ok with that date, so if you agree, we can set it for then.

Best,
Catherine

Catherine Rauschuber
Office of Supervisor David Chiu
President, San Francisco Board of Supervisors
City Hall, Room 264
San Francisco, CA 94102
phone: (415) 554-7453
fax: (415) 554-7454

From: Jamie Cherry <jcherry@rhcasf.com>
To: Catherine.Rauschuber@sfgov.org
Date: 07/19/2011 04:29 PM
Subject: Fwd: Ext. Request :Appeal of Determination of Exemption from Environmental Review for 1945 Hyde Street

Hi Catherine,

I have received your voicemails. I have been extremely business and have not been able to respond sooner.

FYI we just requested an extension for the hearing for the Appeal of Determination of Exemption from Environmental Review for 1945 Hyde. As noted in the letter there is an inaccurate description of the project in the City Attorney's memo and some information from planning that has yet to be published, so it would be ineffective to have the appeal until all the information has been updated.

We'll have to wait to see what the reply is.

Thanks,

Jamie

Jamie Cherry
Chair, 1945 Hyde Street Project Team
Russian Hill Community Association

Begin forwarded message:

From: Jamie Cherry <jcherry@rhcasf.com>
Date: July 19, 2011 3:36:49 PM PDT
To: Angela.Calvillo@sfgov.org
Cc: Joy.Lamug@sfgov.org

Subject: Ext. Request :Appeal of Determination of Exemption from Environmental Review for 1945 Hyde Street

Dear Ms. Calvillo,

Attached please find our letter requesting an extension on Case #2010.0162E, scheduled

8/2/11. Thank you for your attention to this matter.

Sincerely,

Jamie Cherry
Chair, 1945 Hyde Street Project Team
Russian Hill Community Association

[attachment "RHCA_CEQAExtReq_7_19_11.pdf" deleted by Catherine Rauschuber/BOS/SFGOV]

Ext. Request :Appeal of Determination of Exemption from Environmental Review for 1945 Hyde Street

Jamie Cherry to: Angela.Calvillo 07/19/2011 03:36 PM

Cc: Joy.Lamug

1 attachment

RHCA_CEQAExtReq_7_19_11.pdf

Dear Ms. Calvillo,

Attached please find our letter requesting an extension on Case #2010.0162E, scheduled 8/2/11. Thank you for your attention to this matter.

Sincerely,

Jamie Cherry
Chair, 1945 Hyde Street Project Team
Russian Hill Community Association

Russian Hill Community Association

1134 Green St. San Francisco, CA 94109 415-776-2014 rhcasf.com

July 19, 2011

Ms. Angela Calvillo
Clerk of the Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place #244
San Francisco, CA 94102

Re: Appeal of Determination of Exemption from Environmental Review
Case # 2010.0162E, Scheduled 8/2/11

Dear Ms. Calvillo:

We received your response to our letter dated 7/14. Thank you for the quick response. Unfortunately there seems to be some inaccuracies in the City Attorney's Memorandum and pertinent information from Planning not yet available; therefore we are requesting an extension for the Case listed above until the description can be corrected and the other information is available.

1) The language of the City Attorney's Memorandum needs to be emended to reflect an accurate description of the project. It currently states the project is a "demolition of an existing two-story over basement garage..." In fact, the proposed project is a "change in use" not a demolition; the existing structure is 3 story parking garage and the proposal is to construct a 4 story, 7 unit condominium with a commercial space. The RHCA requests that the City Attorney's Memorandum be corrected to reflect the situation correctly as described.

2) The administrative description of the Planning Commission's decision of June 16th has not been published nor has the Zoning Administrator's decision regarding the Variance. The details of the Planning Commission's Discretionary Review decision and the Zoning Administrator's Variance decision are pertinent to the CEQA appeal and the appeal should not be scheduled until this information is available.

We request that the hearing date be scheduled for Tuesday, August 23rd (which is within the Board's target of 45 days from the filing of the appeal) or to a later date if need be, that would allow the Planning Commission and the Zoning Administrator time to publish their decisions, and allow for all parties to review the findings and thus bring to the Board of Supervisors an appeal based on the complete and correct information.

The RHCA filed its appeal based on the action taken at the 6/16/11 hearing of the Planning Commission in order to preserve the RHCA's appeal rights. To have an expedited hearing with the Board of Supervisors before the results of the Planning Commission's hearing are written or published is a disservice to the process and all concerned. We appreciate your consideration of this request.

Sincerely,

Jamie Cherry

Jamie Cherry
Chair, 1945 Hyde Street Project Team
jcherry@rhcasf.com

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 544-5227

July 15, 2011

Jamie Cherry, Co-Chair
Russian Hill Community Association
1134 Green Street
San Francisco, CA 94109

Subject: Appeal of Determination of Exemption from Environmental Review for a Project Located at 1945 Hyde Street

Dear Ms. Cherry:

The Office of the Clerk of the Board is in receipt of a memorandum dated July 14, 2011, (copy attached), from the City Attorney's office regarding the timely filing of an appeal of the Determination of Exemption from Environmental Review for the property located at 1945 Hyde Street.

The City Attorney has determined that the appeal was filed in a timely manner.

A hearing date has been scheduled on **Tuesday, August 2, 2011, at 4:00 p.m.**, at the Board of Supervisors meeting to be held in City Hall, Legislative Chamber, Room 250, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102.

Pursuant to the Interim Procedures 7 and 9, please provide to the Clerk's Office **by**:

8 days prior to the hearing: any documentation which you may want available to the Board members prior to the hearing;

11 days prior to the hearing: names of interested parties to be notified of the hearing.

Please provide 18 copies of the documentation for distribution, and, if possible, names of interested parties to be notified in label format.

If you have any questions, please feel free to contact Rick Caldeira at (415) 554-7711 or Joy Lamug at (415) 554-7712.

Very truly yours,

Angela Calvillo
Clerk of the Board

c:
Cheryl Adams, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Marlena Byrne, Deputy City Attorney
Scott Sanchez, Zoning Administrator, Planning Department
Bill Wycko, Environmental Review Officer, Planning Department
AnMarie Rodgers, Planning Department
Steven L. Vettel, Farella Braun + Martel LLP, Russ Building
235 Montgomery Street, San Francisco, CA 94104
Tina Tam, Planning Department
Nannie Turrell, Planning Department
Linda Avery, Planning Department
Chelsea Fordham, Planning Department
Cynthia Goldstein, Board of Appeals
Victor Pacheco, Board of Appeals

CITY AND COUNTY OF SAN FRANCISCO

DENNIS J. HERRERA
City Attorney

OFFICE OF THE CITY ATTORNEY

MARLENA G. BYRNE
Deputy City Attorney

DIRECT DIAL: (415) 554-4620
E-MAIL: marlena.byrne@sfgov.org

MEMORANDUM

TO: Angela Calvillo
Clerk of the Board of Supervisors

FROM: Marlena G. Byrne
Deputy City Attorney MGB

DATE: July 14, 2011

RE: Appeal of Determination of Exemption from Environmental Review for Project Located at 1945 Hyde Street

You have asked for our advice on the timeliness of an appeal to the Board of Supervisors by Jamie Cherry, on behalf of the Russian Hill Community Association, received by the Clerk's Office on July 13, 2001, of the Planning Department's determination that a project located at 1945 Hyde Street is exempt from environmental review under the California Environmental Quality Act ("CEQA"). The proposed work involves demolition of an existing two-story over basement parking garage and the construction of a three-story over basement, seven-unit residential building, which would also contain one commercial unit. The Appellant provided a copy a Certificate of Determination, Exemption From Environmental Review, issued by the Planning Department on January 27, 2011.

On February 17, 2011, Ms. Cherry, also on behalf of the Russian Hill Community Association, submitted a letter to the Clerk's Office attempting to appeal this same determination of exemption. At that time, although the Planning Department had determined that the proposed project was exempt from environmental review, no City agency had yet taken a discretionary approval action on the proposed project. Thus, because a City agency other than the Board of Supervisors must have taken an approval action in reliance on the CEQA determination before an appeal of that determination would be ripe for consideration, (14 Cal. Code Reg. §15061(e)), we informed you that the appeal was not yet ripe for review.

Circumstances have changed. On June 16, 2011, the Planning Commission heard a request for discretionary review at its regularly scheduled meeting and, taking discretionary review, voted to approve the proposed project with modifications. At the same hearing, the Zoning Administrator granted a request for a variance for the same project. Thus, the appeal is now ripe for review. Additionally, a building permit is currently pending for the proposed project, and we are informed that it has not yet been finally approved. Accordingly, it is our view that the appeal is timely. Therefore, the appeal should be calendared before the Board of Supervisors. We recommend that you so advise the Appellant.

Please let us know if we may be of further assistance.

MGB

cc: Rick Caldeira, Deputy Director, Clerk of the Board
Joy Lamug, Board Clerk's Office

Memorandum

TO: Angela Calvillo
Clerk of the Board of Supervisors
DATE: July 14, 2011
PAGE: 2
RE: Appeal of Determination of Exemption from Environmental Review for Project Located at 1945 Hyde Street

Andrea Ausberry, Board Clerk's Office
Cheryl Adams, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Scott Sanchez, Zoning Administrator, Planning Department
Bill Wycko, Environmental Review Officer, Planning Department
AnMarie Rodgers, Planning Department
Tina Tam, Planning Department
Nannie Turrell, Planning Department
Linda Avery, Planning Department
Rick Crawford, Planning Department
Chelsea Fordham, Planning Department

BOARD of SUPERVISORS

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San Francisco 94102-4689
Tel. No. 554-5184
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TDD/TTY No. 544-5227

July 14, 2011

To: Cheryl Adams
Deputy City Attorney

From: Rick Caldeira
Deputy Director

Subject: Appeal of Determination of Exemption from Environmental Review for Property Located at 1945 Hyde Street

An appeal of determination of exemption from environmental review issued for property located at 1945 Hyde Street was filed with the Office of the Clerk of the Board on July 13, 2011, by Jamie Cherry, on behalf of the Russian Hill Community Association.

Pursuant to the Interim Procedures of Appeals for Negative Declaration and Categorical Exemptions No. 5, I am forwarding this appeal, with attached documents, to the City Attorney's office to determine if the appeal has been filed in a timely manner. The City Attorney's determination should be made within 3 working days of receipt of this request.

If you have any questions, you can contact me at (415) 554-7711.

c: Angela Calvillo, Clerk of the Board
Kate Stacy, Deputy City Attorney
Marlena Byrne, Deputy City Attorney
Scott Sanchez, Zoning Administrator, Planning Department
Bill Wycko, Environmental Review Officer, Planning Department
AnMarie Rodgers, Planning Department
Tina Tam, Planning Department
Nannie Turrell, Planning Department
Linda Avery, Planning Department
Cynthia Goldstein, Board of Appeals
Victor Pacheco, Board of Appeals