



CATEGORICAL EXEMPTION APPEAL

35 Ventura Avenue

Date: September 24, 2021
To: Angela Calvillo, Clerk of the Board of Supervisors
From: Lisa Gibson, Environmental Review Officer – (628) 652-7571
Michelle Taylor – michelle.taylor@sfgov.org - (628) 652-7352

RE: Planning Case No. 2016-013505APL
Appeal of Categorical Exemption for 35 Ventura Avenue

Hearing Date: October 5, 2021
Attachment(s): A - 35 Ventura Avenue Categorical Exemption and Preservation Team Review, dated November 8, 2018

Project Sponsor: Jennifer Wong
Appellant(s): Ryan J. Patterson of Zacks, Freedman & Patterson, PC, on behalf of Tom and Kari Rocca.

Introduction

This memorandum is a response to the letter of appeal to the Board of Supervisors (Board) regarding the Planning Department's (Department) issuance of a categorical exemption under the California Environmental Quality Act (CEQA) for the proposed 35 Ventura Avenue Project (Proposed Project).

The Department, pursuant to Article 19 of the CEQA Guidelines, issued a categorical exemption for the Proposed Project on November 8, 2018 finding that the Proposed Project is exempt from CEQA as a Class 1 categorical exemption.

The decision before the Board is whether to uphold the Department's decision to issue a categorical exemption and deny the appeal, or to overturn the Department's decision to issue a categorical exemption and return the Proposed Project to the Department staff for additional environmental review.

Site Description and Existing Use

The approximately 7,174 sq ft-square-foot Proposed Project site (Assessor's Block 2816 and Lot 008) is located on an irregularly shaped block bounded by Linares Avenue to the north and Castenada Avenue to the south, and Laguna Street to the west, and to the east a green space which separates the neighborhood from Laguna Honda

Boulevard. The property is in the Forest Hills neighborhood in the West of Twin Peaks area. The site is an irregular wedge-shaped lateral and down sloping lot approximately 114' wide x 107'-10" deep containing an existing one-story-over-garage, single family home. The Proposed Project site is within the Residential House, One-Family Detached (RH-1(D)) Zoning District and a 40-X Height and Bulk District.

The existing building was constructed in 1938 and is located within the boundaries of the California Register-eligible Forest Hills Historic District.

Project Description

The Proposed Project proposes to construct a 1,453 square foot, second story vertical addition, a new covered deck and a bay window to an existing one-story-over-basement single-family home. The addition will result in a single-family residence measuring approximately 3,271 square feet.

Background

The following is a brief summary of the relevant project background for the appeal of the categorical exemption issued on November 8, 2018 for the 35 Ventura Avenue Project.

On August 5, 2016, the Project Sponsor, Jennifer Wong, filed a building permit application for the Proposed Project with the Department of Building Inspection (DBI).

On October 18, 2016, the Project Sponsor filed a Project Application with the Department for its review of the Proposed Project described above.

On November 8, 2018, the Department issued a categorical exemption determination finding that the Proposed Project was categorically exempt under CEQA Class 1 - Alteration and Addition to an Existing Structure, and that no further environmental review was required.

On March 16, 2021, the Department issued neighborhood notification pursuant to Planning Code Section 311 for the Proposed Project under Building Permit Application #2016.0805.4402.

On April 15, 2021, Tom Rocca of 1 Ventura Avenue filed a request for discretionary review with the Department on the Proposed Project.

On July 29, 2021, the Planning Commission (Commission) denied the request for discretionary review at a public hearing (Planning Department Case No. 2016-013505DRP), which constituted the approval action for the Proposed Project under section 31.04(h) of the San Francisco Administrative Code.

On August 30, 2021, Ryan J. Patterson of Zacks, Freedman & Patterson, PC, on behalf of Tom and Kari Rocca, timely filed an appeal of the November 8, 2018 categorical exemption to the Board.

On September 3, 2021, the Office of the Clerk of the Board scheduled a hearing before the Board to hear the appeal on October 5, 2021.

CEQA Guidelines

Categorical Exemptions

In accordance with CEQA Section 21084(a), categorical exemptions apply to a list of classes of projects that were determined by the Secretary of the Natural Resources Agency not to have a significant effect on the environment. Projects that fit within the classes of projects defined in CEQA Guidelines sections 15300 to 15333 are exempt from further environmental review under CEQA.

CEQA Guidelines Section 15301:Existing Facilities, or Class 1, consists of the operation, repair, or minor alteration of existing public or private structures and facilities, including additions to an existing structure, provided that the addition will not increase by more than 10,000 square feet if the project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan, and the area in which the project is located is not environmentally sensitive. (CEQA Guidelines Section 15301(e)).

The Proposed Project would add 1,453 square feet vertical addition to the existing 1,818 square foot single-family residence, and therefore fits within the scope of a Class 1 Categorical Exemption. Projects that may cause a substantial adverse change in the significance of a historical resource, however, cannot be exempted from CEQA (CEQA Sections 21084(e) and 21084.1; CEQA Guidelines Section 15300.2(f)). Per CEQA section 21084.1, a historical resource for the purposes of CEQA includes, among other things, a historical resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources, as well as a resource included in a local register of historical resources, or determined to be a historic resource by the lead agency. As stated in CEQA Section 21084 and CEQA Guidelines Section 15064.5(b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. A substantial adverse change is defined as follows:

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project: (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

(3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing

Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary Standards, 1995)¹, Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

In determining the significance of environmental effects caused by a project, CEQA Guidelines Section 15064(f) states that the decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA Guidelines section 15064(f)(5) offers the following guidance: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion supported by facts." The Guidelines further state that "substantial evidence" means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (CEQA Guidelines Section 15384).

Planning Department Responses

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

Response 1: There is substantial evidence that the subject property is not an individually eligible historic resource and is not a Contributor to the Forest Hills Historic District.

The Department's conclusion that the subject property is not an individually eligible historic resource is supported by substantial evidence.

The Appellant does not dispute the Department's finding that the subject property is not an individually eligible historic resource for inclusion in the California Register. In fact, the Appellant implies that significant alterations to the front of the property make it ineligible for individual listing on the California Register and acknowledges in the Appeal letter that the building is highly altered. Specifically, the Appellant notes that: "(t)he façade alterations... are visible to the public" and include "the application of flagstones to the original stucco chimney, construction of a nonhistorical portico at the front entrance, removal of decorative window grilles, replacement of original windows, and replacement of a wood casement window with French doors."

The information included below is a summary of the Department's evaluation process and context for the Department's findings.

The Proposed Project site is located on the east side of Ventura Avenue, in the northern portion of the Forest Hills neighborhood. The surrounding neighborhood consists of detached single-family homes predominantly constructed between 1910 and 1930s. The building located at 35 Ventura Avenue (existing building) was designed by local architect Edmund H. Denke in the Mediterranean Revival style and constructed in 1938. Since

¹The Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary Standards) are federal standards used in the evaluation of projects proposed for historic properties in accordance with federal regulations. The Secretary Standards are used in making decisions about the identification, evaluation, registration, and treatment of historic properties. The list of 10 Rehabilitation Standards, published as the Secretary of the Interior's Standards, is aimed at retaining and preserving those features and materials that are important in defining the historic character of a resource. (Adapted from San Francisco Planning Department Bulletin No. 17.)

constructed, the subject property has undergone significant alterations, including (but not limited to) construction of two horizontal additions to accommodate a porch from the living room and a porch from the bedroom (1990), construction of a horizontal addition on the east elevation and terracing at the front of the property (2004), reconfiguration of the existing deck and installation of a skylight (2004), landscaping and extension of the existing deck (2005), and installation of wrought iron gates at pedestrian and driveway entrances in addition to legalization of the existing side yard fence, front garden walls, and garden/storage shed in the rear yard (2008). A visual inspection of the building suggests additional alterations include application of flagstones to the original stucco chimney, construction of a portico at the front entrance, removal of some decorative window grilles, replacement of original windows with wood casement and hung sash windows, and replacement of a primary elevation wood casement window with French doors.

The property information and history provided above is from Planning Department files and on research provided in the Historic Resource Evaluation (HRE) prepared by VerPlanck Historic Preservation Consulting (dated October 1, 2018). A consultant prepared HRE is required by the Planning Department when a project proposes a substantial change to an age-eligible property that has not been individually evaluated. The HRE provides information about a property's history and context to assist in the determination of whether that property is an historical resource for purposes of CEQA and to aid in the evaluation of the effects a proposed project may have on an historical resource, such as an eligible historic district.

Based on Department records and the HRE, Department staff prepared a Preservation Team Review (PTR) form, a formal evaluation document which determines whether a property is a historic resource and the potential impacts of a proposed project. In the PTR form for 35 Ventura Avenue, staff determined that the subject property is not individually eligible for inclusion in the California Register.² For a property to be considered eligible for listing in the California Register, it must be found significant under one or more of these four criteria: Criterion 1 (Events); Criterion 2 (Persons); Criterion 3 (Architecture); Criterion 4 (Information Potential). As outlined in the PTR form, Department staff determined that the subject property is not individually eligible under any of the four criteria, as it is not associated with any qualifying events or persons. Although designed by noted architect Edmund H. Denke, the building features a modest design that has undergone extensive alterations since construction. The review under Criterion 4, which applies mostly to archeological sites, was completed by the Department's archeological staff and the subject property was not considered eligible under this criterion. As such, the property is not a historic resource under CEQA, and the Proposed Project would not result in a significant impact to an individual historic resource. Therefore, the Proposed Project would not trigger an exception to the use of a categorical exemption under CEQA Section 15300.2 (e), Historical Resources.

The Department's conclusion that the subject property is not a contributor to the Forest Hills Historic District is supported by substantial evidence.

The Appellant contends that the Department has not provided sufficient evidence to justify its finding that the property is not a contributor to the California Register-eligible Forest Hills Historic District.

The information provided below substantiates the Department's conclusion that the subject property is not a contributor to the Forest Hills Historic District.

² Case No. 2016-013505ENV, 35 Ventura Avenue Preservation Team Review, dated November 8, 2018.

35 Ventura Avenue is located within the boundaries of the California Register-eligible Forest Hills Historic District, which the Department initially identified in 2016 as an architecturally cohesive collection of single-family homes that is part of an early twentieth century residential park development.³ The District is distinguished by its residential park planning, including the curvilinear street pattern and cohesive architectural character, predominately in the Revival styles.

The information included below is a summary of the Department's evaluation process and it provides context for the Department's findings. Discussion of the Forest Hill neighborhood below is excerpted and adapted from the Historic Resource Evaluation for 68 Ventura Avenue and the *Draft Historic Context Statement, Gardens in the City: San Francisco Residence Parks, 1906-1940*:

Forest Hill was developed on part of the holdings of Adolph Sutro, whose heirs sold the land to the Residential Development Company (RDC) in 1910. RDC soon sold the tract to the Newell-Murdoch Realty Company. Construction began in 1912 in Forest Hill (north of Dewey Boulevard) and building began on Forest Hill Extension (south of Dewey Boulevard) on May 8, 1913. The land for Forest Hill was owned by the Newell-Murdoch Company. Newell-Murdoch actively advertised the creation and early sales of Forest Hill, claiming that they would incorporate the best features found in the residence parks in Chicago, Cleveland, Detroit, Boston, and New York, as well as artistic features from England and the Riviera. The Newell-Murdoch Realty Company was a partnership of Robert C. Newell and William C. Murdoch. Robert C. Newell (1878-1963).

Hoping to capitalize on their successful residential development of Thousand Oaks, Newell-Murdock hired the same architect, Mark Daniels, to design the new community of Forest Hill. Daniels had recently completed the master plan for Sea Cliff and Bel-Air in Beverly Hills. Rather than attempting to grid the streets over the hilly terrain, Daniels opted to allow the streets to wind naturally around the land's contours, using retaining walls as necessary. Daniels acknowledged that the winding streets were misleading to visitors but countered that the residents had no objections. Two arteries were provided (Pacheco and Magellan), with winding secondary streets adding a picturesque effect with the benefit of slowing traffic. Bernard Maybeck designed three houses within Forest Hill as well as the Forest Hill clubhouse during the 1910s. However, by March 1919, the residents of Forest Hill proved so dissatisfied with Newell-Murdoch's oversight of the tract that they took over the management of streets, sewers, and lighting from the company. The following year, the Lang Realty Company bought out the disengaging Newell-Murdoch Company and began planning, financing, and constructing new houses in Forest Hill. Lang Realty Company was a prolific, family-run development firm active in the Bay Area from 1915 through the 1950s. Throughout the 1920s, Lang Realty used Forest Hill to highlight their work, and opened a "San Francisco Model House" in the tract to showcase design features.

Marketed as "Real Estate, Insurance, and Home Builders," in the mid-1920s, during a peak period of construction, Lang Realty consisted of August Lang, sons August, Jr., William, and Rudolph Lang, and hired in-house architects, including W. E. Hughson and Harold G. Stoner, who designed whimsical houses in a range of Period Revival styles. Other homes were designed by individually commissioned architects in a variety of revival styles including Italian Renaissance Revival, French Renaissance Revival, Colonial Revival, Tudor Revival, Spanish-Colonial Revival, Moorish Revival, and Roman Beau-Arts

³ Case No. 2016-004294ENV, 68 Ventura Avenue Historic Resource Evaluation Response, dated November 28, 2016.

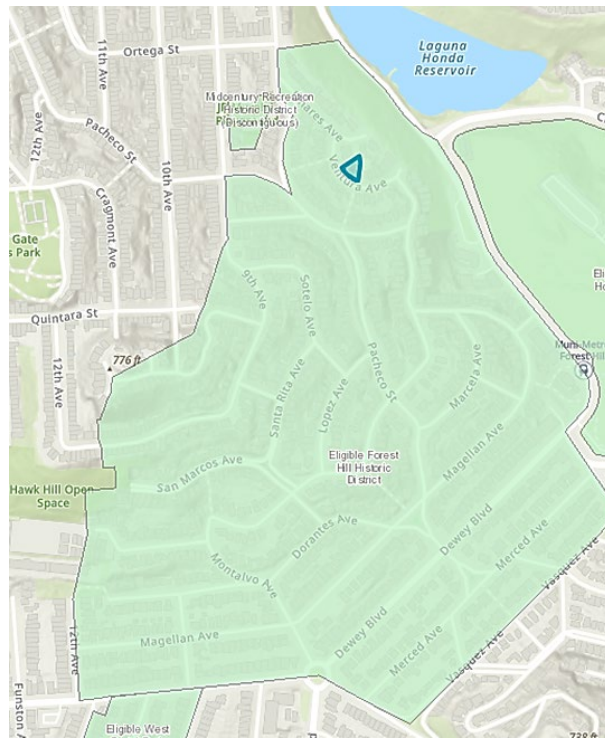
Revival. Morrow and Morrow designed what many consider to be the first Modern (International) Style house in San Francisco in 1933 at 171 San Marcos Avenue. During the 1920s and early 1930s, the Lang Realty Company constructed and sold several of the remaining lots within the Forest Hill neighborhood.

Forest Hill is a historic district eligible for listing in the California Register under Criterion 1 (Events) and Criterion 3 (Architecture) at the local level as an early middle-class community in San Francisco, as an example of the distinctive characteristics of a type and period, and as an area that possesses high artistic values. Specifically, this eligible historic district is notable for the high concentration of early twentieth-century residences that were designed mostly in Revival architectural styles. The period of significance ranges from 1912 (earliest date of construction) to 1939 (latest date of construction related to Lang Realty Company).

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

- Single-family residence on large lots
- One- or two-story form and massing
- Front and side setbacks (landscaped)
- Stucco, brick or wood cladding
- Multi-lite, wood-sash windows
- Plaster or wood ornamentation
- Raised/open entryways
- Articulated roof form and
- Architectural features that contribute to the district's "picturesque" character.

The boundaries of the California Register-eligible Forest Hills Historic District identified through the CEQA historic preservation review process are roughly bounded by Laguna Honda Boulevard, Vasquez Avenue, Garcia Avenue, Kensington Way, Taraval Street, and 12th Avenue. The District boundaries are closely aligned with the original Forest Hills and Forest Hills Extension developments. The figure below shows the large size of the District and the location of the subject property in the District in teal.



After reviewing the HRE, permit history, and other supporting documents, the Department made the following determination in the PTR form:

Although the building exhibits elements common among buildings within the district...[and] the subject property was constructed in the Mediterranean Revival style in 1938, during the eligible district's proposed Period of Significance of 1912-1939, the building has undergone extensive alterations. It is therefore determined that the subject building lacks the integrity to be considered a contributor California Register-eligible Historic District under Criteria 1 or 3.⁴

Per CEQA Guidelines Section 15064.5 (b)(2) character-defining features [physical characteristics] of a historic resource are those characteristics that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources. While the subject property retains elements common to the district such as stucco cladding, siting, and generally massing, the change in materials (flagstones, windows), removal of details (grilles), extensive alterations to opening size, materials, and operation (doors and windows), and form (portico addition) diminish the property's ability to truthfully convey its connection to the historic district. A historic resource must possess historic significance and historic integrity. According to federal guidelines, Integrity is the composite of seven qualities: location, design, setting, materials, workmanship, feeling and association. When properties retain integrity, they are able to convey their association with the significance of a historic resource, such as events, people, architecture, and information potential. Given the number of façade and material alterations to the building, Department staff finds that the building lacks historic integrity, specifically it no longer retains integrity of design, materials, and workmanship, and therefore would not be considered a contributor to the district. Therefore, as noted in the Preservation Team Response,

⁴ Case No. 2016-013505ENV, 35 Ventura Avenue Preservation Team Review, dated November 8, 2018.

because of those extensive alterations and the resulting lack of integrity, Department staff has determined that the building is neither an individually eligible historic resource nor a contributor to the California Register-eligible Forest Hills Historic District.

Although the consultant-prepared HRE differs with Department staff's conclusions in the PTR form regarding whether the amount of alterations performed at the subject property resulted in a lack of integrity, the HRE does not dispute the number of changes to the building. In fact, the HRE does not definitively identify the subject property as a contributor to the Forest Hills Historic District, but rather notes that a case *could be made* that the property be considered a contributor despite significant alterations to the property:

Designed by architect Edmund H. Denke and built in 1938, 35 Ventura Avenue appears at first glance to be an obvious district contributor. However, a careful analysis of the building's physical fabric and a review of building permit applications reveal that the original Mediterranean-style cottage was substantially rebuilt and expanded during the 1990s and 2000s. The changes were by and large harmonious with the house's original styling and the surrounding district, but what exists today is more of a contemporary dwelling than a 1930s-era cottage. Because of these changes, 35 Ventura Avenue does not appear individually eligible for listing in the California Register. On the other hand, it does not detract from the district, and an argument could be made that it is still a contributor to the district on the basis of its legible Mediterranean styling.⁵

Department staff agrees with the HRE that the legible Mediterranean styling of alterations performed in the 1990s do not detract from the district. Staff also agrees with the HRE's finding that the existing property is consistent with the character of this district; however, compatibility does not equate eligibility. As such, Department staff arrived at the opposite conclusion in their PTR form that the alterations, even if compatible, are such that the property could no longer be considered a contributor to the historic district. The building lacks integrity and no longer appears as it did during the district's period of significance; and therefore, Department staff determined that the altered building could not be considered a contributor to that district. As noted in staff's PTR form:

The subject property is located within the boundaries of the Forest Hill California Register eligible Historic District (see Case No. 2016-004294ENV). Although the building exhibits elements common among buildings within the district, staff finds that the subject property is not a contributor to the eligible district. . . Although, the subject property was constructed in the Mediterranean Revival style in 1938, during the eligible district's proposed Period of Significance of 1912-1939, the building has undergone extensive alterations. It is therefore determined that the subject building lacks the integrity to be considered a contributor California Register-eligible Historic District under Criteria 1 or 3.⁶

Department protocols for consultant-prepared environmental review documents explicitly notes that disagreement may occur between consultants and Department staff on the analysis of the Proposed Project.⁷ Ultimately, though, the final decision on how to proceed rests with the Department and the Environmental Review Officer (ERO). Therefore, Department staff do not find a divergent opinion between professionals to be sufficient evidence that Department staff did not adequately evaluate the historic status of the property. The question of whether a property is a historic resource is subject to substantial evidence standard. Here, the

⁵ Historic Resource Evaluation prepared by Ver Planck Historic Preservation Consulting, dated October 1, 2018; page 33.

⁶ Case No. 2016-013505ENV, 35 Ventura Avenue Preservation Team Review, dated November 8, 2018.

⁷ San Francisco Planning Department Memo: Protocols to Ensure Objectivity in Consultant-Prepared Materials, dated February 11, 2019. This memo is publicly available on Planning Department's website.

Department has based its conclusion in substantial evidence based on the whole record. (CEQA Guidelines Section 15384).

Response 2: The Department adequately analyzed the Proposed Project's effect on the historic resource (the Forest Hills Historic District), and correctly found that the Proposed Project would meet the Secretary Standards and would not have an impact on the historic resource.

The Appellant contends that Department staff did not evaluate the Proposed Project's impacts on the California Register-eligible Forest Hills Historic District (historic resource). Further, the Appellant argues that the Department "failed to even recognize the presence of a historic resource at all" and "did not review, discuss, or evaluate whether the project was consistent with the Secretary of Interior's Standards."

As noted above, staff determined that the subject building is not individually eligible for the California Register of Historical Resources, nor is it a contributor to the California Register-eligible Forest Hill Historic District. 35 Ventura Avenue is a non-contributing resource located in the eligible Forest Hill Historic District. Therefore, staff evaluated the Proposed Project design for compatibility within the surrounding context and for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary Standards). After reviewing the Proposed Project and the character-defining features of the California Register-eligible Forest Hills Historic District, the Department determined that the Proposed Project would meet the Secretary Standards and that the proposed alterations to the subject property would not result in a significant impact to the California Register-eligible Forest Hill Historic District.

Contrary to Appellant's claims, the Department both acknowledged the presence of the historic resource (the historic district) and considered impacts to the historic resource in the Categorical Exemption document under Step 5, Section 8: *Other work consistent with the Secretary of the Interior Standards for the Treatment of Historic Properties*, with the following statement:

35 Ventura is a non-contributor to the California Register-Eligible Forest Hill Historic District. The Proposed Project is in conformance with the Secretary of the Interior's Standards and would not have a significant impact on the historic district or any off-site historical resources. The proposed design at would be would be [sic] of its own time and is consistent with the size, scale, massing, and materials of the existing [development along Ventura Avenue and the CR-eligible Historic District. The project would not physically impact nearby buildings.]⁸

Specifically, staff finds that the Proposed Project conforms to applicable Secretary Standards, such as maintaining its historic use as a residential property within a planned residential district (Standard 1) and avoiding removal of historic features or elements (Standard 2). In conformance with Standard 9, which is related specifically to additions and new construction, the proposed alterations are compatible with character defining features of this historic district without being conjectural, or falsely appearing as historic, and new work at the subject property is differentiated from original architectural features. Additionally, the proposed work will not diminish the integrity of the California Register-eligible Forest Hills District because the Proposed Project is compatible with the massing, size, scale, and architectural features of the California Register-eligible Forest Hills District. For example, the Proposed Project will maintain features common to the neighborhood and will not

⁸ The bracketed form of staff's analysis did not display correctly on the published Categorical Exemption due to a formatting error:

deviate from the neighborhood's pattern of development, including materials (stucco) and setting (a detached home on a large lot). Further the proposed additive elements to the existing building will be in keeping with other features associated with the neighborhood and surrounding context such as scale (two stories), roof form (varied), windows (wood, multi-lite, casement), and style (Mediterranean Revival-inspired). In accordance, with Standard 10, future removal of the Proposed Project elements would not impair or impact the integrity of the historic district. As a result, the Proposed Project meets the Secretary Standards and would continue to function as a compatible and non-contributing property to the Forest Hills Historic District; therefore, there is no material change, let alone material impairment, to the historic resource, the California Register-eligible Forest Hill Historic District.

In addition to the CEQA review process, the Proposed Project underwent the Department's design review process. The application of the Department's Residential Design Guidelines is intended to result in building designs that are compatible with the patterns of existing context, such that a contemporary building can fit aesthetically with the context of older buildings. When evaluating conformance with applicable design guidelines, Department staff determined that the massing, composition, materials, proportions, and details of the proposed building at 35 Ventura Avenue would be consistent with and compatible with the other buildings in the surrounding neighborhood.

The Department finds that CEQA review adequately analyzed the Proposed Project's effect on the historic resource, the California Register-eligible Forest Hill Historic District. As stated above, under CEQA, projects that meet the Secretary Standards are presumed not to have an impact on historic resources. (CEQA Guidelines Section 15064.5(b)(3)). Therefore, the Proposed Project would not have a significant impact on the historic resource. As such, the Department found that the Proposed Project would not trigger the need for further environmental review or an Environmental Impact Report (EIR) per CEQA Guidelines Section 15064 and 15064.5.

Response 3: No Substantial Evidence has been Provided to Support a Fair Argument that the Project May Cause a Substantial Adverse Change in the Significance of a Historical Resource

Where the historic resource is a California Register-eligible Historic District, as here, a significant impact would exist if the Proposed Project would result in a substantial adverse change to the district. As explained in Response #1 above, the Proposed Project would not cause a substantial adverse change in the significance of a historic resource because the existing building on the Proposed Project site is not, individually, a historic resource. Second, the proposed alteration to this single building would not result in a substantial adverse change to the California Register-eligible Forest Hills Historic District. This finding is based on the Department's determination of the overall compatibility of the Proposed Project with the historic district, the location of the existing residence on the Proposed Project site in relation to other nearby historic resources, and the overall size of the district.

The Appellant disputes the finding that the Proposed Project development would not result in a significant impact to the California Register-eligible Forest Hills Historic District. Under CEQA, an EIR is required if substantial evidence supports a fair argument that a project may have a significant effect on the environment. (Pub. Res. Code Secs. 2100, 21151, 21080, 21082.2.) A "project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." (CEQA Guidelines Section 15064.5(b).) In this case, the "historic resource" is the California Register-eligible Forest Hills Historic District.

A substantial adverse change is defined as: “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired.” (CEQA Guidelines Section 15064.5(b)(1).) The significance of a historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify or account for its inclusion in, or eligibility for inclusion in a local register of historical resources pursuant to local ordinance or resolution.” Thus, a project may cause a change in a historic resource, but still not have a significant adverse effect on the environment as defined by CEQA, as long as the impact of the change on the historic resource is determined to be less than significant, negligible, neutral or even beneficial.

The Appellant does not provide a fair argument based on substantial evidence that the Proposed Project would result in the inability of the California Register-eligible Forest Hill Historic District to express its historical significance. The Proposed Project proposes to alter a non-contributing building in an architecturally compatible manner that meets the Secretary Standards (as outlined above in Response #2); therefore, after project completion, the Forest Hill Historic District would remain eligible for the California Register as a significant example of early twentieth century residential park design. Ultimately, the proposed alteration of one building in a large historic district (see map above in Response #1 for extent of the district), particularly if those proposed building alterations meet the Secretary Standards, does not meet the threshold for a significant impact to the historic resource (the Forest Hill Historic District). It is also important to note that even in cases where a project involves the alteration or even removal of a contributor to a historic district, there may still be no impact on the district. In such cases, the size and overall integrity of a district is considered when determining whether removal or modification of one part of a district would diminish historic integrity to the extent that a district is no longer able to convey its significance as a whole.⁹ Additionally, the Proposed Project does not propose to remove any contributing properties, and as such, the collection of similar buildings, including types, periods, and styles, would still be strongly represented in the Forest Hill Historic District. Further, the proposed construction on the detached single-family home at the Proposed Project site allows for physical separation between the new construction and neighboring buildings, which further reduces the potential for direct impacts to adjacent potential historic resources. As such, the Department determined that the District would still express its historical significance as an excellent example of early twentieth century residential park design. In other words, the physical characteristics of the historic district (the historical resource at issue here) that convey its historical significance would remain intact and would not be materially impaired by the Proposed Project, within the meaning of CEQA. (CEQA Guidelines Section 15074.5(b)(2)(A)).

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

Conclusion

The Department has determined that the Proposed Project is categorically exempt from environmental review under CEQA on the basis that: (1) the Proposed Project meets the definition of one or more of the classes of

⁹ One recent example in support of this finding is the case involving the removal of the Early Days Statue in the Civic Center Historic District (Planning Department Case No. 2017-015491COA).

projects that the Secretary of Resources has found do not have a significant effect on the environment, and (2) none of the exceptions specified in CEQA Guidelines section 15300.2 prohibiting the use of a categorical exemption are applicable to the Proposed Project.¹⁰ The Appellant has not demonstrated that the Department's historic resource determination is not supported by substantial evidence in the record. Nor has the appellant presented a fair argument based on substantial evidence that the Proposed Project would result in a substantial adverse change to a historic resource, which is the California Register-eligible Forest Hill Historic District in this case.

For the reasons stated above and, in the November 8, 2018 categorical exemption determination, the CEQA determination complies with the requirements of CEQA, and the Proposed Project is appropriately exempt from environmental review pursuant to the cited exemption. The Department therefore respectfully recommends that the board uphold the CEQA categorical exemption determination and deny the appeal of the CEQA determination.

¹⁰ The Appellant only raises one of the exceptions (related to historic resources) specified in CEQA Guidelines Section 15300.2 that prohibits the use of a categorical exemption; all the other exceptions specified in CEQA Guidelines Section 15300.2 are inapplicable to this project's environmental review.

Attachment A

35 Ventura Avenue Categorical Exemption and
Preservation Team Review, dated November 8,
2018



SAN FRANCISCO PLANNING DEPARTMENT

CEQA Categorical Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)
35 VENTURA AVE		2816008
Case No.		Permit No.
2016-013505ENV		201608054402
<input checked="" type="checkbox"/> Addition/ Alteration	<input type="checkbox"/> Demolition (requires HRE for Category B Building)	<input type="checkbox"/> New Construction
<p>Project description for Planning Department approval. 2nd floor addition of 15 feet in height. The proposed property would consist of an approximately 30 ft tall, 3,000 square foot, single family home.</p>		

STEP 1: EXEMPTION CLASS

Note: If neither class applies, an <i>Environmental Evaluation Application</i> is required.	
<input checked="" type="checkbox"/>	Class 1 - Existing Facilities. Interior and exterior alterations; additions under 10,000 sq. ft.
<input type="checkbox"/>	Class 3 - New Construction. Up to three new single-family residences or six dwelling units in one building; commercial/office structures; utility extensions; change of use under 10,000 sq. ft. if principally permitted or with a CU.
<input type="checkbox"/>	<p>Class 32 - In-Fill Development. New Construction of seven or more units or additions greater than 10,000 sq. ft. and meets the conditions described below:</p> <p>(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.</p> <p>(b) The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses.</p> <p>(c) The project site has no value as habitat for endangered rare or threatened species.</p> <p>(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.</p> <p>(e) The site can be adequately served by all required utilities and public services.</p> <p>FOR ENVIRONMENTAL PLANNING USE ONLY</p>
<input type="checkbox"/>	Class _____

STEP 2: CEQA IMPACTS
TO BE COMPLETED BY PROJECT PLANNER

<p>If any box is checked below, an <i>Environmental Evaluation Application</i> is required.</p>	
<input type="checkbox"/>	<p>Air Quality: Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities within an Air Pollution Exposure Zone? Does the project have the potential to emit substantial pollutant concentrations (e.g., backup diesel generators, heavy industry, diesel trucks, etc.)? (refer to EP_ArcMap > CEQA Catex Determination Layers > Air Pollution Exposure Zone)</p>
<input type="checkbox"/>	<p>Hazardous Materials: If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? If yes, this box must be checked and the project applicant must submit an Environmental Application with a Phase I Environmental Site Assessment. <i>Exceptions: do not check box if the applicant presents documentation of enrollment in the San Francisco Department of Public Health (DPH) Maher program, a DPH waiver from the Maher program, or other documentation from Environmental Planning staff that hazardous material effects would be less than significant (refer to EP_ArcMap > Maher layer).</i></p>
<input type="checkbox"/>	<p>Transportation: Does the project create six (6) or more net new parking spaces or residential units? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities?</p>
<input type="checkbox"/>	<p>Archeological Resources: Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non -archeological sensitive area? (refer to EP_ArcMap > CEQA Catex Determination Layers > Archeological Sensitive Area)</p>
<input type="checkbox"/>	<p>Subdivision/Lot Line Adjustment: Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? (refer to EP_ArcMap > CEQA Catex Determination Layers > Topography)</p>
<input type="checkbox"/>	<p>Slope = or > 20%: Does the project involve any of the following: (1) square footage expansion greater than 1,000 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (refer to EP_ArcMap > CEQA Catex Determination Layers > Topography) If box is checked, a geotechnical report is required.</p>
<input type="checkbox"/>	<p>Seismic: Landslide Zone: Does the project involve any of the following: (1) square footage expansion greater than 1,000 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones) If box is checked, a geotechnical report is required.</p>
<input type="checkbox"/>	<p>Seismic: Liquefaction Zone: Does the project involve any of the following: (1) square footage expansion greater than 1,000 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones) If box is checked, a geotechnical report will likely be required.</p>
<p>If no boxes are checked above, GO TO STEP 3. If one or more boxes are checked above, an <i>Environmental Evaluation Application</i> is required, unless reviewed by an Environmental Planner.</p>	
<p>Comments and Planner Signature (optional): Laura Lynch</p>	

**STEP 3: PROPERTY STATUS - HISTORIC RESOURCE
TO BE COMPLETED BY PROJECT PLANNER**

PROPERTY IS ONE OF THE FOLLOWING: (refer to Parcel Information Map)	
<input checked="" type="checkbox"/>	Category A: Known Historical Resource. GO TO STEP 5.
<input type="checkbox"/>	Category B: Potential Historical Resource (over 45 years of age). GO TO STEP 4.
<input type="checkbox"/>	Category C: Not a Historical Resource or Not Age Eligible (under 45 years of age). GO TO STEP 6.

**STEP 4: PROPOSED WORK CHECKLIST
TO BE COMPLETED BY PROJECT PLANNER**

Check all that apply to the project.	
<input type="checkbox"/>	1. Change of use and new construction. Tenant improvements not included.
<input type="checkbox"/>	2. Regular maintenance or repair to correct or repair deterioration, decay, or damage to building.
<input type="checkbox"/>	3. Window replacement that meets the Department's <i>Window Replacement Standards</i> . Does not include storefront window alterations.
<input type="checkbox"/>	4. Garage work. A new opening that meets the <i>Guidelines for Adding Garages and Curb Cuts</i> , and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
<input type="checkbox"/>	5. Deck, terrace construction, or fences not visible from any immediately adjacent public right-of-way.
<input type="checkbox"/>	6. Mechanical equipment installation that is not visible from any immediately adjacent public right-of-way.
<input type="checkbox"/>	7. Dormer installation that meets the requirements for exemption from public notification under <i>Zoning Administrator Bulletin No. 3: Dormer Windows</i> .
<input type="checkbox"/>	8. Addition(s) that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.
Note: Project Planner must check box below before proceeding.	
<input checked="" type="checkbox"/>	Project is not listed. GO TO STEP 5.
<input type="checkbox"/>	Project does not conform to the scopes of work. GO TO STEP 5.
<input type="checkbox"/>	Project involves four or more work descriptions. GO TO STEP 5.
<input type="checkbox"/>	Project involves less than four work descriptions. GO TO STEP 6.

**STEP 5: CEQA IMPACTS - ADVANCED HISTORICAL REVIEW
TO BE COMPLETED BY PROJECT PLANNER**

Check all that apply to the project.	
<input type="checkbox"/>	1. Project involves a known historical resource (CEQA Category A) as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.
<input type="checkbox"/>	2. Interior alterations to publicly accessible spaces.
<input type="checkbox"/>	3. Window replacement of original/historic windows that are not "in-kind" but are consistent with existing historic character.
<input type="checkbox"/>	4. Façade/storefront alterations that do not remove, alter, or obscure character-defining features.
<input type="checkbox"/>	5. Raising the building in a manner that does not remove, alter, or obscure character-defining features.
<input type="checkbox"/>	6. Restoration based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.

<input type="checkbox"/>	7. Addition(s) , including mechanical equipment that are minimally visible from a public right-of-way and meet the <i>Secretary of the Interior's Standards for Rehabilitation</i> .
<input checked="" type="checkbox"/>	8. Other work consistent with the <i>Secretary of the Interior Standards for the Treatment of Historic Properties</i> (specify or add comments): 35 Ventura is a non-contributor to the California Register-Eligible Forest Hill Historic District. The proposed project is in conformance with the Secretary of the Interior's Standards and would not have a significant impact on the historic district or any off-site historical resources. The proposed design at would be of its own time and is consistent with the size, scale, massing, and materials of the existing
<input type="checkbox"/>	9. Other work that would not materially impair a historic district (specify or add comments): (Requires approval by Senior Preservation Planner/Preservation Coordinator)
<input type="checkbox"/>	10. Reclassification of property status. (Requires approval by Senior Preservation Planner/Preservation <input type="checkbox"/> Reclassify to Category A <input type="checkbox"/> Reclassify to Category C a. Per HRER dated (attach HRER) b. Other (specify): Building determined to be a non-contributor in a Historic District as per PTR form signed 11.8.18.
Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST check one box below.	
<input type="checkbox"/>	Further environmental review required. Based on the information provided, the project requires an <i>Environmental Evaluation Application</i> to be submitted. GO TO STEP 6.
<input checked="" type="checkbox"/>	Project can proceed with categorical exemption review. The project has been reviewed by the Preservation Planner and can proceed with categorical exemption review. GO TO STEP 6.
Comments (optional):	
Preservation Planner Signature: Michelle A Taylor	

**STEP 6: CATEGORICAL EXEMPTION DETERMINATION
TO BE COMPLETED BY PROJECT PLANNER**

<input type="checkbox"/>	Further environmental review required. Proposed project does not meet scopes of work in either (check all that apply): <input type="checkbox"/> Step 2 - CEQA Impacts <input type="checkbox"/> Step 5 - Advanced Historical Review STOP! Must file an <i>Environmental Evaluation Application</i>.	
<input checked="" type="checkbox"/>	No further environmental review is required. The project is categorically exempt under CEQA. There are no unusual circumstances that would result in a reasonable possibility of a significant effect.	
	Project Approval Action: Building Permit	Signature: Michelle A Taylor
	If Discretionary Review before the Planning Commission is requested, the Discretionary Review hearing is the Approval Action for the project.	11/08/2018
	Once signed or stamped and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter 31 of the Administrative Code. In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination can only be filed within 30 days of the project receiving the first approval action. Please note that other approval actions may be required for the project. Please contact the assigned planner for these approvals.	

STEP 7: MODIFICATION OF A CEQA EXEMPT PROJECT

TO BE COMPLETED BY PROJECT PLANNER

In accordance with Chapter 31 of the San Francisco Administrative Code, when a California Environmental Quality Act (CEQA) exempt project changes after the Approval Action and requires a subsequent approval, the Environmental Review Officer (or his or her designee) must determine whether the proposed change constitutes a substantial modification of that project. This checklist shall be used to determine whether the proposed changes to the approved project would constitute a "substantial modification" and, therefore, be subject to additional environmental review pursuant to CEQA.

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address (If different than front page)		Block/Lot(s) (If different than front page)
35 VENTURA AVE		2816/008
Case No.	Previous Building Permit No.	New Building Permit No.
2016-013505PRJ	201608054402	
Plans Dated	Previous Approval Action	New Approval Action
	Building Permit	
Modified Project Description:		

DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

Compared to the approved project, would the modified project:	
<input type="checkbox"/>	Result in expansion of the building envelope, as defined in the Planning Code;
<input type="checkbox"/>	Result in the change of use that would require public notice under Planning Code Sections 311 or 312;
<input type="checkbox"/>	Result in demolition as defined under Planning Code Section 317 or 19005(f)?
<input type="checkbox"/>	Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption?
If at least one of the above boxes is checked, further environmental review is required.	

DETERMINATION OF NO SUBSTANTIAL MODIFICATION

<input type="checkbox"/>	The proposed modification would not result in any of the above changes.
If this box is checked, the proposed modifications are categorically exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice.	
Planner Name:	Date:



SAN FRANCISCO PLANNING DEPARTMENT

PRESERVATION TEAM REVIEW FORM

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Preservation Team Meeting Date:		Date of Form Completion	10/26/2018
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PROJECT INFORMATION:		
Planner:	Address:	
Michelle Taylor	35 Ventura Avenue	
Block/Lot:	Cross Streets:	
2816/008	Linares Avenue and Castenada Avenue	
CEQA Category:	Art. 10/11:	BPA/Case No.:
A	N/A	2016-013505ENV

PURPOSE OF REVIEW:			PROJECT DESCRIPTION:	
<input checked="" type="radio"/> CEQA	<input type="radio"/> Article 10/11	<input type="radio"/> Preliminary/PIC	<input checked="" type="radio"/> Alteration	<input type="radio"/> Demo/New Construction

DATE OF PLANS UNDER REVIEW:	2/28/2016
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PROJECT ISSUES:	
<input checked="" type="checkbox"/>	Is the subject Property an eligible historic resource?
<input type="checkbox"/>	If so, are the proposed changes a significant impact?
Additional Notes:	
<p>Historic Resource Evaluation prepared by Ver Planck Historic Preservation Consulting (dated October 1, 2018).</p> <p>Project scope: 2nd floor addition: Add master bedroom & master bathroom, family room, den, 2nd bathroom, & laundry room, add 2 front decks. New construction overlays previous remodel under permit 2003.1203.1546: (add to exist house at rear of the property-deck addition on east side-terrace at front of property.</p>	

PRESERVATION TEAM REVIEW:				
Category:		<input checked="" type="radio"/> A	<input type="radio"/> B	<input type="radio"/> C
Individual		Historic District/Context		
Property is individually eligible for inclusion in a California Register under one or more of the following Criteria:		Property is in an eligible California Register Historic District/Context under one or more of the following Criteria:		
Criterion 1 - Event:	<input type="radio"/> Yes <input checked="" type="radio"/> No	Criterion 1 - Event:	<input checked="" type="radio"/> Yes <input type="radio"/> No	
Criterion 2 -Persons:	<input type="radio"/> Yes <input checked="" type="radio"/> No	Criterion 2 -Persons:	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Criterion 3 - Architecture:	<input type="radio"/> Yes <input checked="" type="radio"/> No	Criterion 3 - Architecture:	<input checked="" type="radio"/> Yes <input type="radio"/> No	
Criterion 4 - Info. Potential:	<input type="radio"/> Yes <input checked="" type="radio"/> No	Criterion 4 - Info. Potential:	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Period of Significance:	<input type="text"/>	Period of Significance:	1912-1939	
		<input type="radio"/> Contributor <input checked="" type="radio"/> Non-Contributor		

Complies with the Secretary's Standards/Art 10/Art 11:	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
CEQA Material Impairment to the individual historic resource:	<input type="radio"/> Yes	<input checked="" type="radio"/> No	
CEQA Material Impairment to the historic district:	<input type="radio"/> Yes	<input checked="" type="radio"/> No	
Requires Design Revisions:	<input type="radio"/> Yes	<input checked="" type="radio"/> No	
Defer to Residential Design Team:	<input checked="" type="radio"/> Yes	<input type="radio"/> No	

PRESERVATION TEAM COMMENTS:

According to Planning Department records and the Historic Resource Evaluation prepared by Ver Planck Historic Preservation Consulting, 35 Ventura Avenue is a single-family residence in the California Register-eligible Forest Hill Historic District. Constructed in 1938, the building was designed by local architect Edmund H. Denke in the Mediterranean Revival style. The subject property is located on a downward sloping lot and presents as a one-story building at the street and a two-story building at the rear. The building is clad in smooth stucco and features cross-gable red tile roof. The building is located on a large triangular lot with a deep front setback. The front (southwest) portion of the property is dominated by heavy vegetation and a low seat wall with a pedestrian gate. A flagstone walkway at the gate provides access to an entry portico with metal-clad square columns and a red clay-tile hip roof. Fenestration at the primary elevations includes two casement windows in historic openings, one of which retains an original decorative security grille. East of the portico is a French door with sidelights. The east elevation is partially visible from the public right of way and features an original chimney re-clad with flagstones. A long sloping driveway east of the building wraps around to a garage on the rear elevation.

According to the permit history, the subject building has undergone several alterations including installation of three aluminum-frame windows at the rear of the building (1977), interior remodel at basement level (1990), construction of two horizontal additions to accommodate a porch from living room and a porch from bedroom (1990), interior remodel at basement and seismic retrofit (1992-1996), interior remodel of bedroom and bathroom (1994-1996), re-roofing (1998), construction of a horizontal addition on the east elevation and terracing at the front of the property (2004), reconfiguration of existing deck and installation of a skylight (2004), landscaping and extension of existing deck (2005), and installation of wrought iron gates at pedestrian and driveway entrances in addition to legalization of existing side yard fence, front garden walls, and garden/storage shed in rear yard (2008). A visual inspection of the building suggests additional undocumented alterations occurred after 1977 including, application of flagstones to the original stucco chimney, construction of a portico at the front entrance, removal of some decorative window grilles, replacement of original windows with wood casement and hung sash windows, and replacement of a primary elevation wood casement window with French doors.

(continued)

Signature of a Senior Preservation Planner / Preservation Coordinator:	Date:
Allison K. Vanderslice Digitally signed by Allison K. Vanderslice Date: 2018.11.08 11:47:07 -08'00'	

**35 Ventura Street, San Francisco
Preservation Team Review Form, Comments**

(continued)

The subject building is not eligible for individual listing in the California Register of Historical Resources under Criterion 1 (events), 2 (persons), 3 (architecture), or 4 (information potential). According to the information provided, the subject property is not associated with events found to be sufficiently important to be significant under Criterion 1. No person associated with the building is significant to history and therefore the property does not appear significant under Criterion 2. Architecturally, the building features a modest design that has undergone extensive alterations since construction. Although architect Edmund H. Denke is credited with designing several notable buildings throughout the city, including contributors to the National Register Uptown Tenderloin Historic District, 35 Ventura has undergone significant alterations and therefore the building is not eligible for listing under criterion 3. Based upon a review of information in the Department's records, the subject building is not significant under Criterion 4 since this significance criterion typically applies to rare construction types when involving the built environment. The subject building is not an example of a rare construction type. Assessment of archeological sensitivity is undertaken through the Department's Preliminary Archeological Review process and is outside the scope of this review.

The subject property is located within the boundaries of the Forest Hill California Register-eligible Historic District (see Case No. 2016-004294ENV). Although the building exhibits elements common among buildings within the district, staff finds that the subject property is not a contributor to the eligible district. The eligible district is significant under Criteria 1 (events) and 3 (architecture) as a middle class planned community that exhibits a high level of architectural cohesion, typically expressed with Revival styles. Although, the subject property was constructed in the Mediterranean Revival style in 1938, during the eligible district's proposed Period of Significance of 1912-1939, the building has undergone extensive alterations. It is therefore determined that the subject building lacks the integrity to be considered a contributor California Register-eligible Historic District under Criteria 1 or 3.

