Laurel Heights Improvement Association of San Francisco, Inc.

BY EMAIL November 7, 2019

San Francisco Board of Supervisors
c/o Clerk of the Board of Supervisors
City and County of San Francisco
City Hall, Room 244
San Francisco, CA 94102

Re: 3333 California Street, San Francisco, CA
Record Number: 2015-014028CUA/PCA/MAP/DUA
Appeal of Certification of Final Environmental Impact Report
Board of Supervisors File No: 191035

1. The Findings Are Not Supported by Substantial Evidence.

The statement of Petree A. Powell, MCP, JD submitted today is further evidence that there are feasible measures that would substantially reduce the Project's significant impact upon the historical resource which the EIR failed to describe and that substantial evidence does not support the City's finding that "where feasible, changes or alterations have been required, or incorporated into, the Project to reduce the significant impacts as identified in the EIR." (Planning Commission Motion No. 20513, p. 39) Similarly, the Planning Commission's finding that "all significant effects on the environment from implementation of the Project have been eliminated or substantially lessened where feasible," is not supported by substantial evidence. (Planning Commission Motion No. 20513, pp. 62-63)

2. There is Further Evidence of the Unstable Project Description.

The City's Response to LHIA's appeal states that the "uses occupying any of the ground floor space designated in the EIR as retail could be social and philanthropic uses." (Response to appeal, p. 14) However, those spaces are now designated as retail spaces in the plan sheets submitted to the Planning Department, and office uses were removed from the Walnut building.

At the October 21, 2019 hearing before the Board of Supervisors Land Use and Transportation Committee, Mr. Craig Salgado, Chief Executive Officer of the JCCSF, testified that the JCC supported the inclusion of the Social Services and Philanthropic Facilities as a use in the Special Use District and "this description provides a helpful pathway as we consider how to serve our growing community." (See Ex. A, transcript of Mr. Salgado's October 21, 2019 statements)

Before the October 21, 2019 hearing before the Board of Supervisors Land Use and Transportation Committee, Mr. Craig Salgado, told me that the JCC was full and he had been looking for office spaces along Sacramento Street. Yet, the project description and EIR did not disclose that expanded space for the JCC was among the uses that could be made of the site.

It would be important for the public to know how much of the retail space could be transferred to Social Service and Philanthropic Facility Use, both to formulate feasible alternatives as well as to analyze the feasibility of alternatives because retail uses bring more vehicular traffic than office uses. The amount of retail use that could be eliminated (to accommodate Social Service uses) would also show the minimum amount of retail space that the developer would regard as acceptable. The public could have used this information in formulating alternatives to the Proposed Project. Also, had the public known of the potential Social Services and Philanthropic Facilities uses, they could have asked questions about the nature and extent of the uses and their potential environmental impacts, to which the City would have been required to respond in the Final EIR.

Moreover, designating social service uses as permitted uses in the Special Use District could facilitate a future request to add additional space to the site plan to accommodate such uses. Before the October 21, 2019 hearing, I also asked Mr. Salgado what uses of the property the JCC could make under the Memorandum of Understanding between the JCC and the developer that was referred to in a recorded document that did not disclose the substance of the understanding. (See Ex. J to LHIA's October 7, 2019 appeal of certification of Final EIR, recorded document referring to a Memorandum of Understanding between developer and JCCSF) Mr. Salgado told me that the Memorandum of Understanding was a private agreement and that he would not disclose it. Based upon the evidence above, it is reasonable to assume that the JCC may make some use of the property. However, this potential use was not disclosed in the EIR so that the public could understand the nature of the uses proposed to be made of the site.

Respectfully submitted,

Laurel Heights Improvement Association of SF, Inc.

Kathryn Devincenzi

By: Kathryn Devincenzi, President

Attachments: Exhibit A

EXHIBIT A

"Good afternoon

I am Craig Salgado, Chief Operating Office of the JCCSF.

I am here today to speak in support of the proposed project at 3333 California St.

For 86 years the JCCSF has served the people of SF from the corner of Presidio and California directly across the street from the project site.

We provide a vibrant public Community space for people of all ages and backgrounds to gather, explore, connect and flourish.

You'll find little children and their care-givers, school age youth, young adults, families, robust and aging seniors as well as folks in mid-life like me walking through our doors for wellness and sports activities, hands on arts and recreation as well as thought provoking arts and cultural events.

The JCC believes that the 3333 Cal. St. development as proposed will create a more vibrant neighborhood with more housing, activities and open spaces which will benefit the broad community that we serve.

We understand the acute need for more housing, especially affordable housing for senior in our city, and are pleased to see that this as an element of the proposed project.

We appreciate that the project includes publicly accessible open spaces and the design thoughtfully stitches together the neighborhood by continuing the street grid.

We believe that this will benefit everybody by encouraging walking and access to outdoor space in an urban neighborhood.

The open space in this project also allows the JCC to continue to have an emergency evacuation location nearby which is critical to our community serving purpose.

The JCC also supports the inclusion of the Social Services and Philanthropic Facilities as a use in the SUD and this designation provides a helpful pathway as we consider how to serve our growing community.

We'd like to thank the Pardo/SKS group for its diligent efforts to involve the community. In the past four years the JCC has been a regular participant on the project neighborhood advisory committee as well as a venue and attendee.

Re: 3333 California Street, San Francisco, CA
Record Number: 2015-014028ENV/CUA/PCA/MAP/DVA

Laurel Heights Improvement Association Appeal of Planning Commission's Certification of Final EIR/ CEQA Findings

Board of Supervisors File No: 191035

Exhibits to Statement of Petree A. Powell, MCP, JD

EXHIBITS B-E

EXHIBIT B

IMPACT EVALUATION

Impact CR-1: The proposed project or project variant would cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5 of the CEQA Guidelines. ***(Significant and Unavoidable with Mitigation)***

The Midcentury Modern-designed corporate campus at 3333 California Street, built between 1956 and 1966, is eligible for listing in the California Register of Historical Resources as an individual property under Criterion 1 for its association with the broad pattern of development in San Francisco as a unique urban adaptation of a typically suburban property type (corporate campus) and under Criterion 3 for its uniform Midcentury Modern architectural qualities, and for its association with master landscape design firm Eckbo, Royston & Williams and master engineering firm of John J. Gould & H. J. Degenkolb & Associates. As such, the property is considered a "historical resource" for the purposes of the CEQA.

The HRER identifies "Character-Defining Features," presented on pp. 4.B.20-4.B.21, that are the distinctive qualities and characteristics of 3333 California Street site that convey the property's historic and architectural significance and justify its eligibility for listing in the California Register of Historical Resources.

The proposed project or the project variant would demolish portions of the office building, demolish the annex building, and remove all of the project site's existing designed landscape elements and features, including, but not limited to, the curvilinear shapes in pathways, driveways, and planting areas; integrated landscape features, including planter boxes and seating; brick perimeter walls; and the concrete pergola and terraced planting feature facing Laurel Street. The clearing of the perimeter of the site under the proposed project or project variant, including hardscape features and mature plantings, would eliminate most of these character-defining landscape features that contribute to and convey the historic and architectural significance of the project site as a Midcentury Modern corporate campus.

The proposed project or project variant would replace the landscaped and open setbacks that characterize the Midcentury Modern corporate campus with a mix of 13 new buildings and new designed landscapes along the periphery of the site. Construction of the proposed new infill buildings would line the street perimeter of the site, obstructing prominent views of the existing office building from public rights-of-way through open landscaped grounds to a greater degree than under current conditions.

Additionally, under the proposed project or project variant, the office building would undergo a series of alterations including demolition of approximately half of the building, including a parking garage, two wings, and a section of the middle of the building, effectively dividing one building into two; replacement of the existing glass curtain wall; replacement of the projecting

floor plates with updated projecting floorplates; and construction of new projecting vertical bays. These alterations would materially alter the character-defining Midcentury Modern characteristics of the office building. Overall, the proposed project or project variant would result in substantial changes to the massing and materiality of the office building such that the project site would no longer convey its historic and architectural significance as a Midcentury Modern corporate campus.

The planning department's HRER evaluated project impacts using the relevant Secretary's Standards, which are described in full on pp. 4.B.31-4.B.32. The planning department determined that the proposed project or project variant would not be in conformance with the Secretary's Standards and would materially impair the historic resource at the project site.[27] Standard 1 states that "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." Regarding Standard 1, alteration of the main building for renovation into housing would entail demolition of approximately half of the building footprint and replacement of the existing glass curtain wall, which has been identified as a character-defining feature. Although the floor plates that reveal a deep eave would still be visible in the portions of the main building that would be retained, the changes proposed to adapt the building for a new use would be far beyond the minimal changes identified as being acceptable under Standard 1. Also, the large open landscaped site that contains design elements integrated with the existing office building, which has also been identified as a character-defining feature of the subject property, would largely be infilled with new construction and the site would no longer feel like a corporate campus, thus altering the environment of the property. Thus, the proposed project or project variant would not conform with Standard 1.

Standard 2 states that "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." Standard 5 states that "distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved." Regarding Standard 2 and 5, the proposed project or project variant would involve substantial modifications to both the main building and surrounding landscape such that its historic character would not be retained or preserved. The proposed project or project variant would involve removal of many of the materials of the main building and surrounding landscape that have been identified as character-defining features. The setting would be lost with redevelopment of the open space and construction of 13 new buildings along the periphery of the site. The replacement of the glass curtain wall system would be with a system more weighted toward a residential design, which

[27] Justin Greving, Preservation Planner, San Francisco Planning Department, *Historic Resource Evaluation Response (Part 2), Case No. 2015-014028ENV, 3333 California Street*, May 14, 2018. (See EIR Appendix C-4.)

could result in material changes to its distinctive features and finishes, which are present on each of the building's façades. For this reason, the alterations to the building and landscape, through the infill of open spaces and removal of specific elements of the character-defining landscape features, would not conform with Standard 2 and would alter distinctive design elements of the building which would not conform with Standard 5. Additionally, the proposed alterations to the main building would also not preserve the historic character of the property. Altogether, the loss of 50 percent of the building footprint, which would include separating the main building into two distinct forms, and the removal and replacement of the glass curtain wall, would not conform with Standard 2 or 5.

Standard 3 states that "each property shall be recognized as a physical record of its time, place, and use," and, "changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken." Because the proposed project does not include Rehabilitation of the building or retention of the landscape and does not introduce features or elements that create a false sense of historical development, Standard 3 does not apply.

Standard 4 states, "changes that have acquired historic significance in their own right shall be retained and preserved." Aside from the previously determined phases of construction that have all taken on significance, there are no other changes to the property that have taken on significance. Therefore Standard 4 does not apply.

Standard 6 states, "deteriorated historic features shall 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 proposed project or project variant will replace the glass curtain wall with a new glass curtain wall that will not match the existing glass curtain wall in design, color, texture or materials. Thus, the proposed project or project variant would not conform with Standard 6.

Standard 7 states that "chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used." Because the proposed project does not include the retention of historic materials, Standard 7 does not apply. Rehabilitation Standard 8 states that "significant archeological resources affected by a project shall be protected and preserved" and that "if such resources must be disturbed, mitigation measures shall be undertaken." Mitigation has been identified to reduce the potential impact to archaeological resources to a less-than-significant level (see Topic E.3, Cultural Resources, pp. 125-135, of the initial study [EIR Appendix B]). Thus, the proposed project or project variant would conform with Standard 8.

Standard 9 states that "new additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The

new work will 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." Regarding Standard 9, the proposed project or project variant would include the construction of 13 new buildings that would alter the spatial configuration of the large open designed landscape of the subject property, which is considered a character-defining feature. These open areas help create the campus-like feel of the subject property, and to infill these areas would alter the sense of a corporate campus setting. Other character-defining landscape details, such as curvilinear shapes within the pathways, driveways, and planting areas, and hardscape features such as the brick perimeter and retaining walls, integrated planter boxes and seating would also be removed. Exterior alterations to the main building would substantially alter the general form of the building, both in its general massing but also in the materiality of the exterior elevations. Although the casual observer may infer that the new construction does incorporate the existing building, the alterations in their entirety would not meet the goal of Standard 9 in protecting the integrity of the property and its surrounding environment. Thus, the proposed project or project variant would not conform with Standard 9.

Standard 10 states that "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." Regarding Standard 10, the proposed project or project variant would involve the removal of most character-defining landscape and site features and substantial modifications to the main building. If new construction were removed in the future, the landscape and site features would not be able to be replaced, and the changes to the main building could not be reversed, leaving the essential form and integrity of the historic property impaired. Thus, the proposed project or project variant would not conform with Standard 10.

For these reasons, including the removal of elements that convey the project site's history as a corporate campus, the construction of new buildings on formerly open and/or landscaped space at the project site, and the changes to the massing and materiality of the office building, the proposed project and project variant would not be in conformance with Standards 1, 2, 5, 6, 9, and 10, and would materially alter the physical characteristics of 3333 California Street that convey its historic significance and that justify its inclusion in the California Register. As such, the proposed project or project variant would cause a substantial adverse impact on 3333 California Street, a historical resource, and would be considered a significant impact under CEQA.

Chapter 6, Alternatives, presents a range of alternatives that would meet most of the project objectives and could avoid or substantially lessen significant effects of demolition under the proposed project. The Alternatives chapter includes alternatives that would retain, in whole or in part, existing elements of the project site.

Implementation of Mitigation Measures M-CR-1a: Documentation of Historical Resource and M-CR-1b: Interpretation of the Historical Resource, shown below, would lessen the impact of the proposed demolition and new construction within the project site by documenting and presenting the complex's history and character as a Midcentury Modern-designed corporate campus. However, these mitigation measures would not reduce this impact to a less-than-significant level.

Mitigation Measure M-CR-1a: Documentation of Historical Resource

Prior to issuance of demolition or site permits, the project sponsor shall undertake Historic American Building/Historic American Landscape Survey-like (HABS/HALS-like) documentation of the building and associated landscape features. The documentation shall be undertaken by a professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History, History, or Architecture (as appropriate) to prepare written and photographic documentation of 3333 California Street. The specific scope of the documentation shall be reviewed and approved by the Planning Department but shall include the following elements:

Measured Drawings – A set of measured drawings shall be prepared that depict the existing size, scale, and dimension of the historic resource. Planning Department Preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (e.g., plans, sections, elevations). Planning Department Preservation staff will assist the consultant in determining the appropriate level of measured drawings;

Historic American Buildings/Historic American Landscape Survey-Level Photographs – Either Historic American Buildings/Historic American Landscape Survey (HABS/HALS) standard large-format or digital photography shall be used. The scope of the digital photographs shall be reviewed by Planning Department Preservation staff for concurrence, and all digital photography shall be conducted according to the latest National Park Service (NPS) standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS/HALS photography. Photograph views for the data set shall include contextual views; views of each side of the building and interior views, including any original interior features, where possible; oblique views of the building; and detail views of character-defining features, including landscape elements.

All views shall be referenced on a photographic key. This photographic key shall be on a map of the property and shall show the photograph number with an arrow to indicate the direction of the view. Historic photographs shall also be collected, reproduced, and included in the data set.

HABS/HALS Historical Report – A written historical narrative and report shall be provided in accordance with the HABS/HALS Historical Report Guidelines. The written history shall follow an outline format that begins with a statement of significance supported by the development of the architectural and historical context in which the structure was built and subsequently evolved. The report shall also include architectural description and bibliographic information.

Video Recordation – Video recordation shall be undertaken before demolition or site permits are issued. The project sponsor shall undertake video documentation of the affected historical resource and its setting. The documentation shall be conducted by a professional videographer, one with experience recording architectural resources. The documentation shall be narrated by a qualified professional who meets the standards for history, architectural

history, or architecture (as appropriate) set forth by the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations Part 61). The documentation shall include as much information as possible—using visuals in combination with narration—about the materials, construction methods, current condition, historic use, and historic context of the historical resource. This mitigation measure would supplement the traditional HABS/HALS documentation, and would enhance the collection of reference materials that would be available to the public and inform future research.

Softcover Book – A Print-on-Demand softcover book shall be produced that includes the content from the historical report, historical photographs, HABS/HALS photography, measured drawings, and field notes. The Print-on-Demand book shall be made available to the public for distribution.

The project sponsor shall transmit such documentation to the History Room of the San Francisco Public Library, San Francisco Architectural Heritage, the Planning Department, and the Northwest Information Center. The HABS/HALS documentation scope will determine the requested documentation type for each facility, and the project sponsor will conduct outreach to identify other interested groups. All documentation will be reviewed and approved by the Planning Department's Preservation staff before any demolition or site permit is granted for the affected historical resource.

Mitigation Measure M-CR-1b: Interpretation of the Historical Resource

The project sponsor shall facilitate the development of an interpretive program focused on the history of the project site. The interpretive program should be developed and implemented by a qualified professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, such as a museum or exhibit curator. This program shall be initially outlined in a proposal for an interpretive plan subject to review and approval by Planning Department Preservation staff. The proposal shall include the proposed format and location of the interpretive content, as well as high-quality graphics and written narratives. The proposal prepared by the qualified consultant describing the general parameters of the interpretive program shall be approved by Planning Department Preservation staff prior to issuance of the architectural addendum to the site permit. The detailed content, media and other characteristics of such interpretive program shall be approved by Planning Department Preservation staff prior to issuance of a Temporary Certificate of Occupancy.

The interpretative program shall include but not be limited to the installation of permanent on-site interpretive displays or screens in publicly accessible locations. Historical photographs, including some of the large-format photographs required by Mitigation Measure M-CR-1a, may be used to illustrate the site's history.

The primary goal is to educate visitors and future residents about the property's historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts. These themes would include but not be limited to the subject property's historic significance as a Midcentury Modern corporate campus designed by Edward B. Page with a landscape designed by Eckbo, Royston & Williams. The interpretive program should be developed in coordination with the archaeological program, which would likely include interpretation of the subject property's inclusion in the larger site of California Registered Landmark 760, Former Site of Laurel Hill Cemetery.

Although the site's past use as the Laurel Hill Cemetery was not part of the determination of historic significance under this evaluation of the historic architectural resource, the former use of the project site as a cemetery was studied in the Cultural Resources section of the initial study (see EIR Appendix B, pp. 125-135). The initial study includes Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting, pp. 129-132; Mitigation Measure M-CR-2b: Interpretation, p. 133; and Mitigation Measure M-CR-4: Tribal Cultural Resources Interpretive Program, p. 135; which require testing, monitoring, and data recovery, and preparation of interpretive programs to document the former use of the site as a cemetery as well as to document subsurface tribal cultural resources.

Impact CR-2: The proposed project or project variant would not materially alter, in an adverse manner, the physical characteristics of any off-site historical resources that justify their inclusion in the California Register of Historical Resources. ***(Less than Significant)***

As discussed under "Nearby Historic Resources Outside of the Project Site" on pp. 4.B.25-4.B.30, there is one historic resource on the block faces that border the project site: San Francisco Fire Station No. 10 at 655 Presidio Avenue. San Francisco Fire Station No. 10 is located directly southeast of the project site across Masonic Avenue. This two-story reinforced concrete building was constructed in 1955 as part of the 1952 Firehouse Bond Act (Bond Act). In 2010, a potential discontiguous historic district, tentatively named the San Francisco 1952 Firehouse Bond Act Thematic Historic District and composed of 20 firehouses including Station No. 10, was identified.

Due to its date of construction, architectural style, and integrity, Station No. 10 appears to contribute to the potential San Francisco 1952 Firehouse Bond Act Thematic Historic District. Despite its proximity to the corporate campus at the project site and its near simultaneous year of construction, the corporate campus and Station No. 10 have no contextual or architectural relationship. Additionally, while the two historic resources were constructed with one year of each other and are both generally designed in the Midcentury Modern architectural style, they express different interpretations of that broadly defined style. The fire station is more utilitarian in design. It includes areas of stucco cladding and a low-pitched roof with overhanging eaves, while the corporate campus reflects uniformly higher-style design and emphasizes horizontality through the use of a flat roof and extensive areas of continuous glazing. Finally, the fire stations that are included in the San Francisco 1952 Firehouse Bond Act Thematic Historic District are discontiguously located within a variety of urban contexts, and do not depend on any one specific type of setting in order to be able to convey their historic significance. Overall, the corporate campus at the project site and the fire station at 655 Presidio Avenue do not share a contextual or architectural relationship. Thus, changes to the corporate campus at the project site would not have an impact on the historic significance of the fire station.

EXHIBIT C

STATE OF CALIFORNIA - THE NATURAL RESOURCES AGENCY
EDMUND G. BROWN, JR., Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov

August 31, 2018

John Rothman, President
Kathryn Devincenzi, Vice President
Laurel Heights Improvement Association of San Francisco
22 Iris Avenue
San Francisco, California 94118

RE: **Fireman's Fund Insurance Company, Determination of Eligibility National Register of Historic Places**

Dear Mr. Rothman and Ms. Devincenzi:

I am writing to inform you that on August 29, 2018, Fireman's Fund Insurance Company was determined eligible for the National Register of Historic Places (National Register). As a result of being determined eligible for the National Register, this property has been listed in the California Register of Historical Resources, pursuant to Section 4851(a)(2) of the California Code of Regulations.

There are no restrictions placed upon a private property owner with regard to normal use, maintenance, or sale of a property determined eligible for the National Register. However, a project that may cause substantial adverse changes in the significance of a registered property may require compliance with local ordinances or the California Environmental Quality Act. In addition, registered properties damaged due to a natural disaster may be subject to the provisions of Section 5028 of the Public Resources Code regarding demolition or significant alterations, if imminent threat to life safety does not exist.

If you have any questions or require further information, please contact Jay Correia of the Registration Unit at (916) 445-7008.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Enclosure

August 31, 2018

Previous Weekly Lists are available here: http://www.nps.gov/history/nr/nrlist.htm

Please visit our homepage: http://www.nps.gov/nr/

Check out what's Pending: https://www.nps.gov/nr/pending/pending.htm

Prefix Codes:

SG - Single nomination
MC - Multiple cover sheet
MP – Multiple nomination (a nomination under a multiple cover sheet)
FP - Federal DOE Project
FD - Federal DOE property under the Federal DOE project
NL - NHL
BC - Boundary change (increase, decrease, or both)
MV - Move request
AD - Additional documentation
OT - All other requests (appeal, removal, delisting, direct submission)
RS – Resubmission

WEEKLY LIST OF ACTIONS TAKEN ON PROPERTIES: 8/16/2018 THROUGH 8/31/2018

KEY: State, County, Property Name, Address/Boundary, City, Vicinity, Reference Number, NHL, Action, Date, Multiple Name

CALIFORNIA, SAN FRANCISCO COUNTY,
Fireman's Fund Insurance Company Home Office,
3333 California St.,
San Francisco, RS100002709,
OWNER OBJECTION DETERMINED ELIGIBLE, 8/29/2018

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form.* If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

1. Name of Property

Historic name: Fireman's Fund Insurance Company Home Office

Other names/site number: University of California at San Francisco Laurel Heights Campus

Name of related multiple property listing:

N/A

(Enter "N/A" if property is not part of a multiple property listing

2. Location

Street & number: 3333 California Street

City or town: San Francisco 94118 State: CA County: San Francisco 075

Not For Publication: ☐ Vicinity: ☐

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___national ___statewide ___local

Applicable National Register Criteria:

___A ___B ___C ___D

Signature of certifying official/Title: **Date**
State or Federal agency/bureau or Tribal Government

In my opinion, the property ___ meets ___ does not meet the National Register criteria.
Signature of commenting official: **Date**
Title : **State or Federal agency/bureau or Tribal Government**

7. Description

Architectural Classification
(Enter categories from instructions.)
MODERN MOVEMENT International Style
MODERN MOVEMENT

Materials: (enter categories from instructions.)
Principal exterior materials of the property:
Foundation: concrete
Walls: glass
Walls: aluminum
Walls: brick
Walls: concrete
Roof: asphalt
Other: metal
Landscape walls: brick
Gates in landscape walls: metal
Sidewalks: exposed aggregate concrete
Terraces and patios: exposed aggregate concrete divided into panels by inlaid rows of brick
Circular tree beds: modular sections of concrete

Narrative Description
(Describe the historic and current physical appearance and condition of the property. Describe contributing and noncontributing resources if applicable. Begin with **a summary paragraph** that briefly describes the general characteristics of the property, such as its location, type, style, method of construction, setting, size, and significant features. Indicate whether the property has historic integrity.)

Summary Paragraph

The Fireman's Fund Insurance Company Home Office is a 10.2-acre property in a central, predominantly residential area of San Francisco called Laurel Heights. From the property there are views in various directions to distant parts of San Francisco. The property consists of two buildings and a landscape that were designed to function as a single entity. The main building, referred to in this nomination as the Office Building, is a large three- to seven-story structure

located in the center of the property. There is also a much smaller, one-story Service Building in the northwest corner of the property. The two buildings were designed to complement each other in character and materials. The Office Building is a glass walled structure with an open character. The Service Building is a brick building with a closed character. The Office Building is an International Style structure which despite its size is built into its sloping hillside site in such a way as to minimize its presence. Its four wings, each built for different functions, range from three floors to seven floors. It is characterized by its horizontality, its bands of windows separated by the thin edges of projecting concrete floors, and brick trim. The wings of the building frame outdoor spaces whose landscape design connects the outdoors with the indoors both functionally and conceptually. The landscape design includes outdoor spaces for use by employees, parking lots, circulation paths, and vegetation. The principal outdoor spaces are the Entrance Court, the Terrace, and small areas around the Auditorium.

Narrative Description

Section 7 - Table of Contents

The Service Building is a steel frame and reinforced concrete structure enclosed in brick. Its openings are limited to glass and aluminum doors, a few window openings, and ventilating louvers in the boiler room.

LANDSCAPE

Landscape Features Associated with the Mid-1950s Design

The landscape was an integral part of the original design for the new corporate headquarters commissioned by Fireman's Fund in the mid-1950s. The San Francisco-based firm of Eckbo, Royston, and Williams (ERW) was the landscape architect for the original landscape design, completed in 1957, and its successor firm Eckbo, Dean, Austin, and Williams (EDAW) designed the landscape associated with the mid-1960s additions. The landscape setting around the modernist Office Building integrates functional needs (such as parking lots and internal circulation) with large areas of lawns and structured outdoor spaces (the Terrace, Entrance Court, and the Auditorium's outdoor spaces). The landscape is designed to promote the integration between architecture and landscape and uses forms and materials that are characteristic of modernist designs from the mid-twentieth century. (See Map 2 and Map 3)

Brick Wall

A brick wall, which takes different forms, provides a continuous and unifying element around the edges of the site. It exists as a retaining wall along the perimeter of the property's northeast, north, and west sides. Three gated entrances—one for the employees on California Street and the service and executive/visitor entrances on Laurel Street—are integrated into these sections of the wall. Each of these three entrances has a separate vehicular and pedestrian opening framed by brick pillars and secured by a double-leaf, metal rail gate when the property is closed. On the south side of the Executive/Visitor Gate, the perimeter wall is transformed into low retaining walls that define a series of planting beds along the west end and south side of the Executive Wing. The wall continues along the outer edge of the Terrace garden, along the bank that parallels Masonic Avenue, and then reconnects to the southeast corner of the Office Wing (east). Here rectangular brick planting beds have been incorporated into the wall, creating a zig-zag alignment similar to that found in other locations (i.e., on the bank along Laurel Street in the vicinity of the Entrance Court, on the southwest side of the Terrace, and in the bench wall that frames the eastern side of the Terrace).

Parking Lots and Internal Circulation

Two parking lots occupy the land in front (north) of the Office Building. The East Parking Lot and the West Parking Lot sit on either side of the entry drive, which aligns with the Employee Gate and an employee entrance (E2) into the Office Building.

The entry drive from California Street branches near the front of the Office Building; it continues to the east to provide access into the East Parking Lot and the circular ramps to the Garage. The western branch provides access to the West Parking Lot, and exits at the Laurel Street Service Gate. A short service road connects this branch of the entry drive to the Entrance Court parking lot and provides access to a service area at the west end of the Office Wing.

Topography in Relationship to the Spatial Organization and Function of the Site

The site slopes downward from its southwest corner, at the intersection of Euclid and Laurel streets. Grading has modified the topography so that the main outdoor spaces are located at different levels of the Office Building, as appropriate to their functions. Although the East and West Parking Lots are at a slightly lower elevation than the Office Building, the design of the landscape links these directly to its first floor. The Terrace garden, framed by the Office and Cafeteria Wings and originally intended to provide employees an outdoor setting for lunch and breaks, provides a direct connection into the Cafeteria Wing. And the Entrance Court, which originally provided parking for the executives and visitors, is at the same grade as the Executive/Visitor Entrance.

Major Vegetation Features

Lawns create the setting for the Office Building along the west and south sides of the property (and create a compatible connection between the property and the surrounding residential neighborhood) and slope downward toward California and Masonic Streets, respectively.

Some of the large trees which were part of the Laurel Hill cemetery vegetation were saved and incorporated into planting islands in the East and West Parking Lots by ERW in their mid-1950s design. Two Monterey cypress trees on a low mound in the East Parking Lot and a blue gum eucalyptus and several Monterey cypress in the West Parking Lot are remnants of this design feature. Monterey cypress, which were planted at some point after the addition of the Garage in the mid-1960s, occupy the land between the East Parking Lot and California Street. These trees, and the brick perimeter wall, buffer views of the parking lots from the street and lessen the apparent size of the Office Building.

Landscaped banks along the west and southeast sides of the site provide a transition between different elevations of the land within the property and the surrounding streets. The presence of these landscaped banks (planted mainly with grass, some larger shrubs, and several trees) help to reduce the need for tall retaining walls and also increase the amount of green space around the edges of the property.

Entrance Court

The Entrance Court on the west side of the Office Building—in the outdoor space between the Office, Cafeteria, and Executive Wings—provides parking and access to the building's

Executive/Visitor Entrance and was one of the two structured outdoor spaces in ERW's mid-1950s design. A narrow, rectangular planting bed (10' x 55') at the center of the asphalt paving creates a U-shaped drive, which connects to the Executive/Visitor Gate on Laurel Street. Sidewalks (exposed aggregate concrete) and narrow planting beds (with Japanese maple trees, azaleas, rhododendron, New Zealand flax, and decorative rocks) line the sides of the Entrance Court's parking lot.

Terrace

In ERW's mid-1950s design, the principal structured outdoor space was the Terrace, which was intended as a place for employees to sit outside during lunch and at breaks. The Terrace is framed by the south side of the Office Wing and the east side of the Cafeteria Wing, where it is protected from the prevailing west wind and provides views to the east and south of San Francisco. This garden area has two levels. The lower level contains a biomorphic-shaped lawn and a paved patio, which wraps around the lawn's north and east sides. Steps along the east side of the upper-level terrace connect down to the lower level of the garden. Both the terrace and patio are paved with exposed aggregate concrete which is divided into rectangular panels by inlaid rows of red brick aligned with the window frames of the building. A brick retaining wall runs along the east and north sides of the lower-level patio. A raised planting bed, to the east of this wall, provides a visual boundary along the Terrace garden's east side. Three raised, circular beds (one on the upper-level terrace, one at the western edge of the lawn, and one at the north end of the lawn) each contain a tree; the sides of these circular beds are constructed of modular sections of pre-cast concrete. (See Map 3)

The plan for the Terrace provides a classic modernist composition. The biomorphic-shaped lawn contrasts with the rectilinear pattern of the pavement and the geometric form of the three , three circular tree beds, the zig-zag alignment of the wall along its eastern edge, and the curved arch of hedge in the raised planting bed along its eastern edge. The triangular relationship between the three circular tree beds adds yet another level to the geometry of the composition.

Benches, which appear to have been custom-built for the mid-1950s design, are attached to the interior face of the wall along the Terrace's east side. The wooden boards for the seat and back are attached by metal bolts to a metal frame, which is attached to the wall; both the wood and metal are painted black. Benches of a similar design (three wood boards mounted on a bent metal frame) are mounted onto the patio at various places along its inner edge.

Landscape Features Associated with the Mid-1960s Design

EDAW, the successor firm to the ERW partnership which was dissolved in 1958, prepared the landscape design that accompanied the mid-1960s additions to the Office Building. Just as the mid-1960s architectural additions were intended to be compatible with the original Office

Building's design vocabulary, EDAW's design was intended to compliment and reference the original, mid-1950s ERW design. The key parts of the mid-1960s landscape design included the addition of paved features around the east, south, and west sides of the new Auditorium—to create outdoor sitting areas and to facilitate pedestrian circulation—and rebuilding a portion of the brick perimeter wall along Masonic Avenue. These two outdoor sitting areas—one on the east side of the Auditorium and one on its west side—connect to entrances into the Auditorium. (See Map 3)

The Auditorium is located below and to the east of the Terrace. A ramp begins on the south side of the Terrace and leads down to the Auditorium. The ramp bisects the landscaped bank that extends from the Terrace down to Masonic Avenue. The ramp, a part of the original mid-1950s design, is paved in the same exposed aggregate concrete as the Terrace, but lacks the inlaid rows of brick.

The outdoor area on the Auditorium's west side is paved with exposed aggregate concrete divided into panels by a double row of inlaid brick that references, but is not identical to, the pavement in the mid-1950s Terrace. Black metal benches are mounted along the eastern and western sides of the pavement. A raised circular tree bed (with concrete walls identical to the three circular tree beds at the Terrace) is located on its western side.

The outdoor area on the Auditorium's east side is paved with concrete divided into rectangular panels by wood inserts. The east and south sides of this area are enclosed by rectangular brick planting beds which are incorporated into the Masonic Avenue brick perimeter wall. The arrangement of these beds creates a zig-zag alignment for the wall, which is similar to that found in other locations (i.e., the brick perimeter wall along Laurel Street below/west of the Entrance Court, in the retaining wall at the southwest corner of the Terrace, and along the bench wall that frames the east side of the Terrace).

The landscape along the east side of the property—which is at the same grade as Presidio Avenue—consists of a row of redwood trees planted across the eastern façade of the building, a level lawn between the building and street, and the Presidio Avenue Service Drive which provides access to the sub-level three of the Garage.

INTEGRITY

For the period of significance 1957-1968, alterations to the property are addressed below for the buildings and the landscape separately, followed by an evaluation of integrity of the property as a whole.

for sidewalks; the exposed aggregate concrete divided into panels by rows of brick in the pavement at the Terrace and in the Auditorium's west-side sitting area; the metal for the entrance gates; the custom-designed wood benches found in the Terrace and at the Entrance Court's outdoor sitting area; and the circular tree beds constructed of modular sections of concrete found in the Terrace the Auditorium's west-side sitting area.

Combined Buildings and Landscape

Together the buildings and landscape of the Fireman's Fund Home Office constitute a single resource that possesses integrity as measured by the seven aspects of integrity, as follows:

1) Location: The property is in its original location. It has not been moved.
2) Design: The property retains the essential elements of its design and the relationship between the parts of the design. Alterations to the design since the period of significance are relatively minor. It retains integrity of design.
3) Setting: The setting of the property is the same in all major respects as at the time it was first built. It retains integrity of setting.
4) Materials: The materials used in the buildings and landscape during the period of significance are all present. The property retains integrity of materials.
5) Workmanship: Evidence of workmanship, both from craftsmanship (brick and landscape features) and industrial processes (glass manufacture, concrete finishing, extrusion of aluminum) are all present. The property retains integrity of workmanship.
6) Feeling: Because the property as a whole – its buildings and landscape – are little altered and have been well-maintained, it retains integrity of feeling from the period of significance.
7) Association: Apart from the lettering on the outside wall near two entrance gates with the name of the current owner and occupant of the property, the property is almost indistinguishable from the time of its ownership by Fireman's Fund Insurance Company. Thus it retains integrity of association.

CHARACTER DEFINING FEATURES

Office Building

Plan of the building with wings open along the sides to the immediate landscape and to views of the distant city.

Horizontality of massing

Horizontal lines of projecting edges of concrete floors

Horizontal bands of nearly identical window units

Uninterrupted glass walls

Window units of aluminum and glass

Circular garage ramps

Exposed concrete piers over the Garage

Wrought iron deck railings that match gates in the landscape

Brick accents and trim

Service Building

Massing of rectangular volumes

Brick walls with a minimum of openings

Landscape

Terrace, as the "centerpiece" of the landscape, designed to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco); key character-defining features include its biomorphic-shaped lawn surrounded by a paved terrace and patio (paved with exposed aggregate concrete divided into panels by rows of brick); brick retaining wall and large planting bed around the east and north sides of the paved patio, custom-designed wood benches, and three circular tree beds constructed of modular sections of concrete.

Entrance Court, providing a connection between the Executive/Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria Wing; key character-defining features include a central paved parking lot surrounded on its north, east, and west sides by narrow planting beds; exposed aggregate sidewalks along the north, east, and west sides of the parking lot; and a low free-standing brick wall along its north side.

Two outdoor sitting areas—one on the east side of the Auditorium and one on its west side—that connect to entrances into the Auditorium; key character-defining features for the area on the west side of the Auditorium include the pavement (exposed aggregate divided into panels by rows of bricks), circular tree bed constructed of modular sections of concrete; and metal benches; key character-defining features for the area on the east side of the Auditorium include the pavement (concrete divided into panels by wood inserted into expansion joints).

Brick wall (constructed of red brick set in running bond pattern similar in appearance to brick used in exterior of main building) that takes several forms and which forms a continuous and unifying element around the edges of the site.

Three gated entrances—one for the employees on California Street and the service and executive/visitor entrances on Laurel Street—that are integrated into the brick perimeter wall.

Internal Circulation System (entrance drive, service drive, East and West Parking lots)

Vegetation features that helps to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods including (1) the large trees in and around the East and West Parking Lots, (2) the lawns on the west, south, and east sides of the property, and (3) the planted banks along Laurel and Masonic streets.

Statement of Significance Summary Paragraph (Provide a summary paragraph that includes level of significance, applicable criteria, justification for the period of significance, and any applicable criteria considerations

The Fireman's Fund Insurance Company Home Office is eligible for the National Register under Criteria A and C at the local level. Under Criterion A, it is significant in the area of Commerce for its association with the San Francisco insurance industry, an important industry in the history of the city from the Gold Rush to the present. In particular, it represents the postwar boom in San Francisco's insurance industry when many companies built new office buildings. At that time, Fireman's Fund was one of the largest insurance companies in the United States. It was the only major insurance company headquartered in San Francisco. It was a leader among all insurance companies in San Francisco in its embrace of new ideas, symbolized by its move away from downtown to an outlying location. Under Criterion C, the Fireman's Fund Home Office is significant in several ways. It is significant as one of the principal embodiments of the postwar decentralization and suburbanization of San Francisco. Fireman's Fund was the first major office building to be built outside of downtown in a suburban setting and it was the first whose design was fully adapted to the automobile. It is significant as the work of three masters, the architect Edward B. Page, the engineering firm of John J. Gould & H.J. Degenkolb/Henry J. Degenkolb & Associates, and the landscape architectural firm of Eckbo, Royston, & Williams (ERW)/Eckbo, Austin, Dean, and Williams (EDAW). As a modernist, through his experiences in Paris in 1930, Edward Page had direct links to the birth of modern architecture and to its development in the United States. The Fireman's Fund Home Office is his best known and most important work. The Gould and Degenkolb engineering firms were among the leading firms in San Francisco for decades after World War II and the Fireman's Fund Home Office was the first designed after Henry Degenkolb became a partner. During the period of significance, both ERW and EDAW were recognized as one of the country's leading landscape architectural firms. In the post-World War II era, ERW/EDAW led the way in expanding the profession of landscape architecture and contributed to the popularization of the modernist design vocabulary and to modernism as an approach to creating outdoor spaces that addressed contemporary needs. The Fireman's Fund Insurance Company Home Office, a single property including both architectural and landscape architectural elements which were designed to complement each other, is significant under National Register Criterion C as an example of a corporate headquarters in San Francisco that reflects mid-twentieth-century modernist design principles. The period of significance is 1957 to 1968, covering the period from the year when the first phase of the buildings and landscape were completed to fifty years ago, after which the Fireman's Fund company continued on this site as a leading insurance company in San Francisco and nationally until it sold the property in 1983. Although there are numerous alterations, these alterations do not alter the essential character of the property and it retains a high level of integrity.

EXHIBIT D

l'architecture d'aujourd'hui

André BLOC directeur général
Pierre VAGO président du comité de rédaction
Alexandre PERSITZ rédacteur en chef

bureaux

Numéro réalisé par Renée DIAMANT-BERGER sous la direction d'André BLOC

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Suisse : 69 Fr. suisses
Allemagne : 70 D.M.
Amérique du Nord, du Sud, Belgique, Japon et tous pays non mentionnés : 16 $

Prix de ce numéro :
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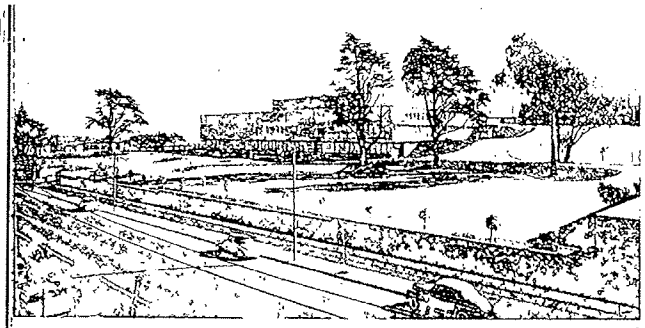

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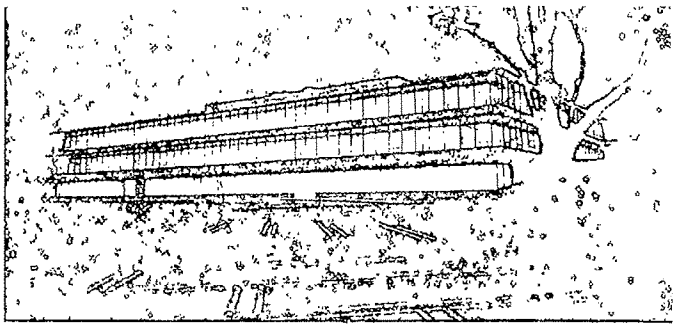


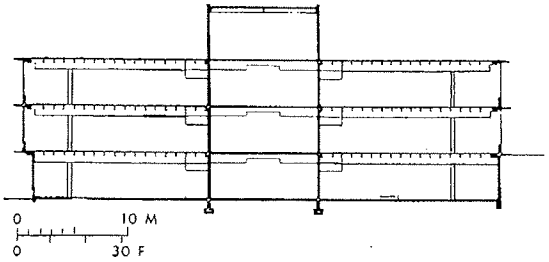
Photos Silvain 2

LE SIÈGE D'UNE COMPAGNIE D'ASSURANCES, A SAN FRANCISCO

EDWARD B. PAGE, ARCHITECTE.

JOHN J. GOULD ET HENRY J. DEGENKOLB, INGÉNIEURS.

ECKBO, ROYSTON ET WILLIAMS, ARCHITECTES PAYSAGISTES.



Le Siège de la « Fireman's fund Insurance Co » se développe dans un vaste terrain de 5 ha situé sur l'une des collines de San Francisco, dans un quartier résidentiel.

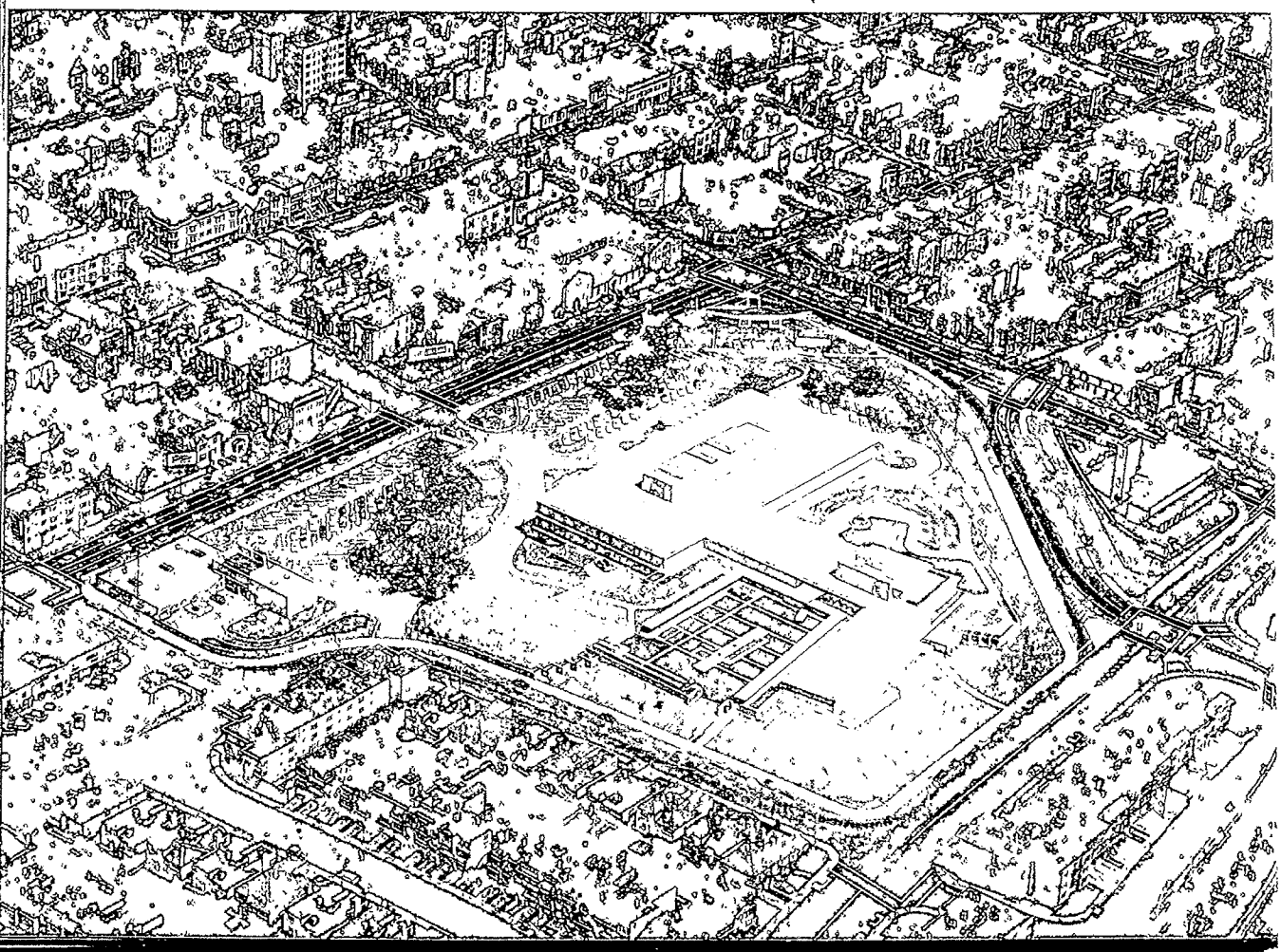
Si l'on vient du centre de la ville, on aperçoit de loin les longs bandeaux de baies vitrées qui affirment l'horizontalité du bâtiment. En effet, à l'opposé de la plupart des grands centres d'affaires construits en hauteur, il a été recherché ici un rythme différent obtenu en fonction d'un terrain libre de dimensions exceptionnelles. Ainsi, les bâtiments sont mis en valeur par les jardins qui ont fait l'objet d'une étude particulière des architectes Eckbo, Royston et Williams.

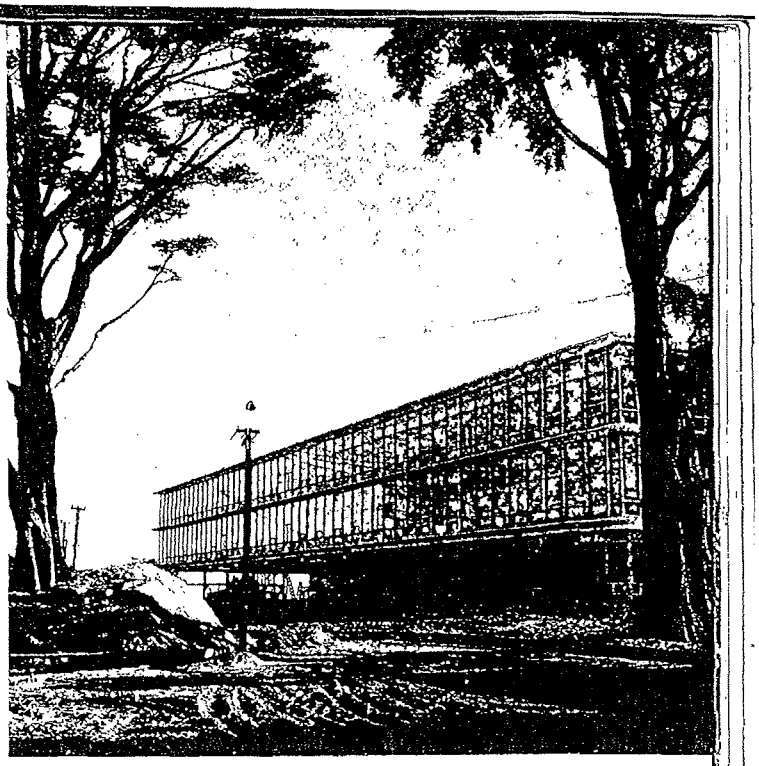
L'ensemble se compose d'un bâtiment de plan rectangulaire, à trois niveaux, abritant des bureaux, et d'un bloc en forme de L à deux niveaux, destiné à l'administration disposant d'une entrée indépendante et lié au bâtiment principal par le hall d'entrée.

Le public accède à ce hall d'entrée, situé à l'étage, depuis la cour d'honneur. Cette entrée distribue à la fois le grand hall du public et les bureaux de direction répartis dans l'aile basse.

Le personnel entre au niveau inférieur où ont été prévus également : une partie réception, les services courrier, archives, vestiaires, le grand bureau du « cerveau élec-

Photo G. Moulin 5





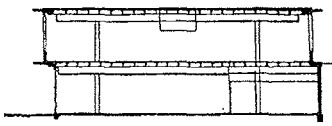
tos E. Braun

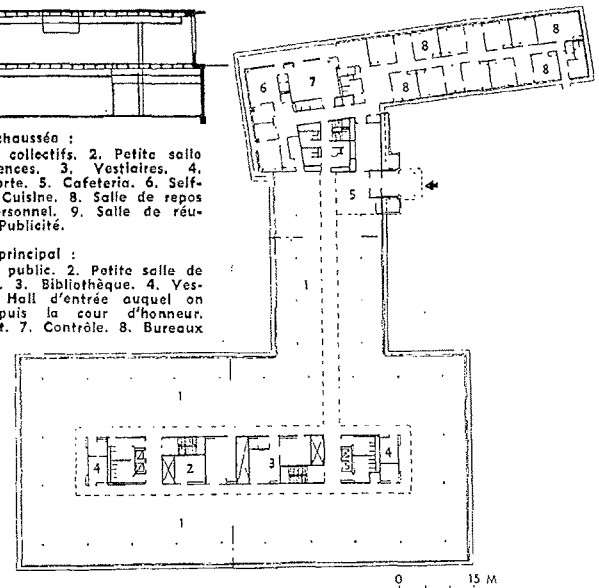
nique » qui forme en soi un tout isolé par un double plancher pour le réglage des bles et un système d'air conditionné spécial pour le bon fonctionnement de cet équipe- nt de précision particulièrement sensible aux variations de température. Au rez-de- aussée ont été répartis les services de statistiques, de comptabilité, de publicité et les nexes sociales : salles de repos, de jeux et d'enseignement mises à la disposition du rsonnel, ainsi que le cafeteria de 300 places occupant une surface de 700 m² ; ce teteria, d'où l'on dispose d'une vue magnifique sur la ville, les collines et la baie, ut être transformé en salle de réunions pour 800 personnes. Le niveau supérieur est tièrement aménagé en bureaux.

Le bâtiment est réalisé au moyen d'une ossature en B.A. avec des colonnes en acier ; murs-rideaux sont entièrement en verre et profilé d'aluminium. Le bâtiment principal t établi sur une poutraison de 9 × 12 m avec porte-à-faux de 5 m vers l'extérieur ; centre ont été placés des murs de contreventement de 0,35 d'épaisseur. Les planchers nt faits de dalles nervurées en B.A. de 9 m de portée entre les poutres principales.

Pour obtenir la meilleure flexibilité fonctionnelle, un module de 0,90 × 0,90 a été lopté. Les plafonds sont établis sur la base de ce module, de même que les panneaux s cloisons amovibles normalisées. Les plafonds suspendus, au-dessus desquels ont été sposées les installations d'éclairage, les bouches d'air conditionné et les émetteurs de dio qui transmettent parfois une musique légère pour faciliter le travail, sont consti- és d'une grille en aluminium en forme de nids d'abeilles.

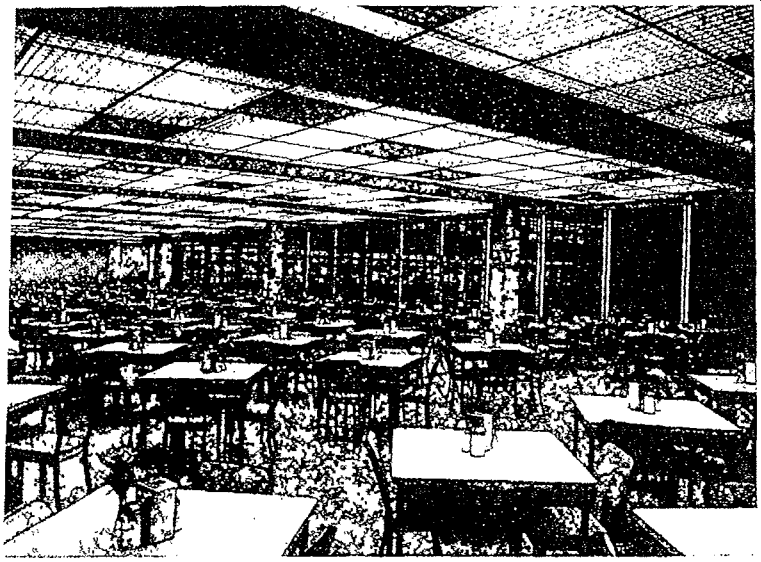
V. JANSON DE FISCHER.

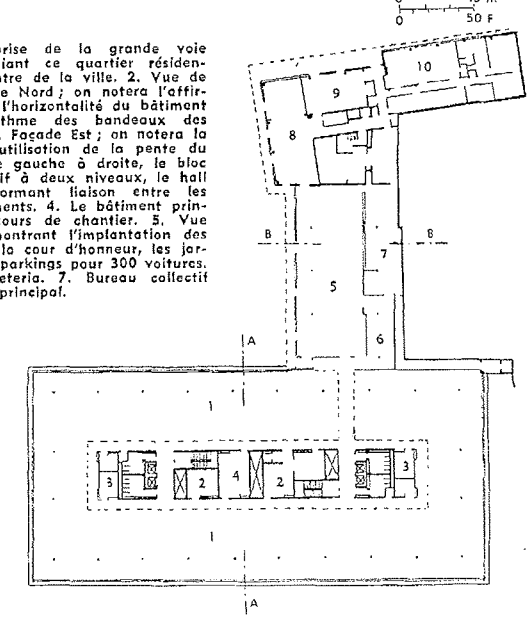




A. Rez-de-chaussée :
1. Bureaux collectifs. 2. Petite salle de conférences. 3. Vestiaires. 4. Chambre forte. 5. Cafeteria. 6. Self-service. 7. Cuisine. 8. Salle de repos pour le personnel. 9. Salle de réunions. 10. Publicité.

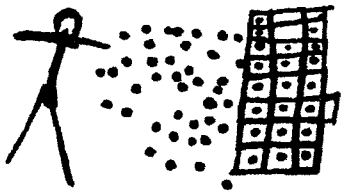
B. Niveau principal :
1. Hall du public. 2. Petite salle de conférences. 3. Bibliothèque. 4. Vestiaires. 5. Hall d'entrée auquel on accède depuis la cour d'honneur. 6. Président. 7. Contrôle. 8. Bureaux individuels.





1. Vue prise de la grande voie d'accès reliant ce quartier résidentiel au centre de la ville. 2. Vue de nuit, façade Nord ; on notera l'affirmation de l'horizontalité du bâtiment par le rythme des bandeaux des fenêtres. 3. Façade Est ; on notera la judicieuse utilisation de la pente du terrain ; de gauche à droite, le bloc administratif à deux niveaux, le hall d'entrée formant liaison entre les deux bâtiments. 4. Le bâtiment principal en cours de chantier. 5. Vue aérienne montrant l'implantation des bâtiments, la cour d'honneur, les jardins et les parkings pour 300 voitures. 6. La cafeteria. 7. Bureau collectif au niveau principal.

EXHIBIT E



URBAN LANDSCAPE DESIGN

GARRETT ECKBO

McGRAW-HILL BOOK COMPANY

New York San Francisco Toronto London Sydney

CONTENTS

BUILDING AND SITE

The single building on a site larger than its ground floor area has been the typical concentration of modern architectural and landscape thinking. Much good work has been done, and many good examples publicized, particularly in the residential field. The problem may be summarized as follows: the site is a piece of real estate, variable in size, form, and topography, produced by land subdivision. The building, dominated by the economics of construction and the demands of functional design, will tend to establish its own size and form, even if conditioned by some preconception of form from without. Thus the landscape design problem is to achieve the best possible development of a space or series of spaces determined by the relationship between the building and the site boundaries. Within these, the specific demands of the program must be satisfied. Problems of orientation and climate control—sun, wind, heat, glare, reflection—must be resolved. Visual demands created by the form and height of the building and the size and position of glass areas must be satisfied. The exterior landscape, beyond the site boundaries, must be analyzed and included or excluded by judicious screening or framing elements. Finally, yard spaces which do not relate to building or specific function must be developed in meaningful forms. All of this will be more difficult if the building has been conceived as a self-sufficient unit, and less difficult if the organization of building and site spaces is conceived as one coherent pattern at one time.

The relation between building size, lot area, and auto-parking requirements will also be critical. More and more the auto becomes the enemy of the landscape, as its asphalt requirements destroy or make impossible green space around buildings. Our land-use patterns are so pinched and penurious that we seem unable to control this expanding force by recognizing the positive value of landscape and pedestrian space in land-use and coverage controls. Another factor might be the control of car sizes in the public interest. This would, of course, be considered a gross violation of the individual freedom of choice between large and small cars. We are reminded of the famous freedom of choice of rich and poor alike to sleep beneath bridges.

On sites larger than the joint requirements of building and parking—a shrinking and idyllic condition—we have a range in scale from the bare minimum and almost useless strip of foundation planting around the building, through walled patio spaces of minimum or adequate size, to that expansion in comfort and luxury which allows lawns, trees, and the ultimate richness of woods and meadows. The growing tendency for housing and productive enterprises to migrate into the open country may provide them with the temporary illusion of manor house affluence, overlooking other people's farms or woods. But, unless this outlook is over some guaranteed land-use such as a water district or regional park, the forces of exurbanization will soon catch up with them. The peculiar hodgepodge checkerboard leapfrog pattern of modern urbanization renders no open country safe without adequate planning controls by local government. Even these tend to give before the pressure of big-time power structures.

Within basically similar land subdivision patterns, we may have a range in building-site concepts as wide as that from the New England colonial house, standing four-square with its neighbors on a sea of grass with only occasional trees or shrubs to suggest boundaries between them, to the Latin patio house which encloses the entire lot for private living space, creating structural continuities in which individualized architecture is hard to find. These extreme contrasting forms have obvious roots in severe and mild climates, but perhaps are related even more to social attitudes: the puritan combination of tight economy with "I have nothing to hide from my neighbors"; the Latin expansive and rich concept of daily living, combined with demand for absolute family privacy. In our heterogeneous culture the relations between privacy and neighborliness are more variable. The former tends to be self-centered and antisocial while the latter tends to produce self-conscious do-goodism and social maneuvering. Balanced relations between the two are made difficult by social conflicts between individualism and togetherness, competition and cooperation; and by our heavily institutionalized structures of subdivided land-use, with minimum consideration for relations between the parts. The pressures of technology and of community needs are forcing their way through these structures; larger and larger parcels of land are being assembled for unified design and development.

1

FIREMAN'S FUND INSURANCE COMPANY
San Francisco, Calif.

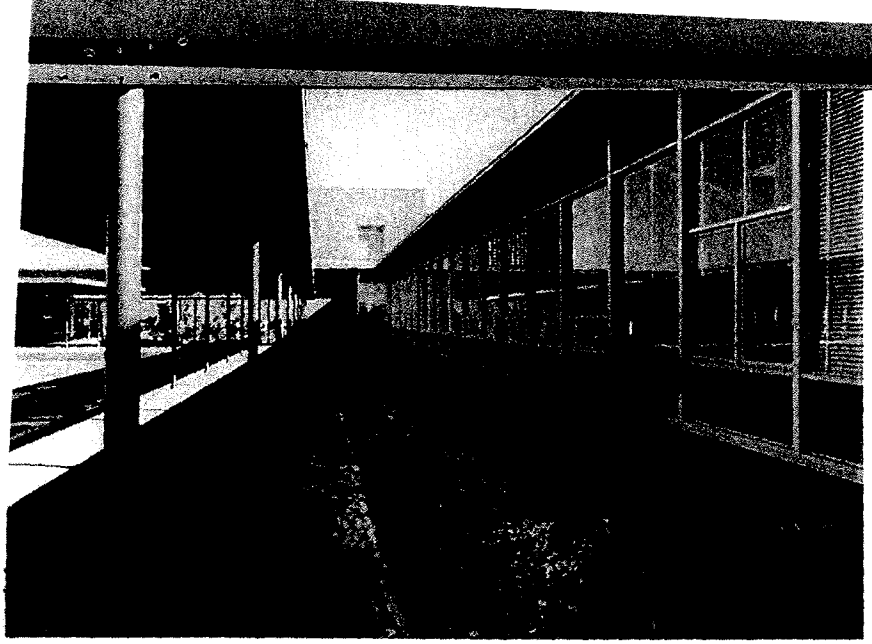
Of the 10.2 acres in the Fireman's Fund Insurance Company site, approximately 1¾ acres are devoted to the building and 2¾ acres to parking, leaving the major portion of the site for gardens.

Considerable care was taken in the arrangement of the building, parking areas, and levels to save all the existing trees. Some of the trees were left on mounds of earth, where the ground was depressed, and others were contained in wells where the ground was raised. In all cases, special pruning, feeding, aeration, and watering were done during construction to help the trees make the necessary adjustments.

The most impressive of the trees saved are the beautiful specimens of Monterey cypress in the parking areas on the California Street side of the building. Here, too, three very large blue gums are retained. In some ways, the most distinctive specimens saved are the large red-flowering eucalyptus near the corner of California street and Presidio, and the magnificent native toyon or Christmas berry in the parking area above Presidio. In addition to these, six live oaks and a very large redwood and Monterey pine are saved.

Taking the cue from the existing trees and from the special climate features of the site, the live oak and red-flowering eucalyptus were chosen to predominate. Secondary themes are carried by the Monterey cypress, olives, redwoods, and Bishop pines.

In addition to the general landscaping of the areas between the building and the streets on all sides, there are two special gardens of note. The first is the entrance court, and the second is the terrace adjacent to the cafeteria.



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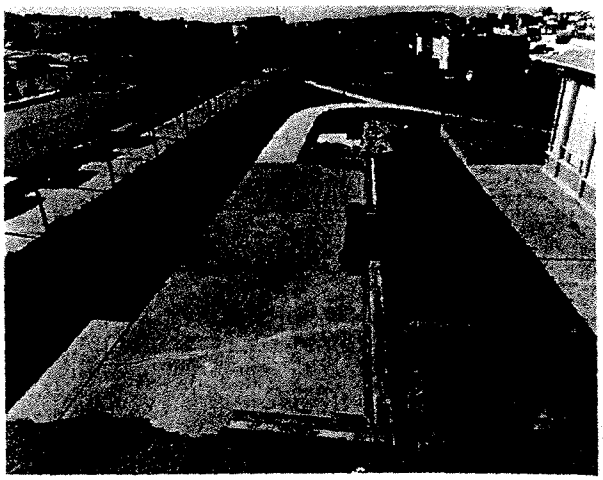

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The entrance court off Presidio Avenue is U-shaped, its major paving of brick and asphalt, with adequate parking space for those visiting the executive offices. Dominating this court is the 80-ft reflection pool in the center, planted with water lilies. Two planting areas straddling the pool contain a specimen live oak and ground covers of creeping myrtle and pink-flowering sunrose. All along the arbor-covered walks around this court, between arbors and building, are shade-loving plants in great variety, including rhododendrons, azaleas, ferns, fuchsias, and bluebells. Along one side, a long row of alternating blue and white Agapanthus *provide a splash of color against a low brick wall.*

The terrace off the cafeteria and lounges is particularly useful and colorful. Since it is situated on the east side of the building, it is protected from the prevailing west wind and is elevated so that there is a good view of a large part of San Francisco. Benches have been provided, so that employees can relax in the sun during lunch or coffee breaks. Specimen oaks and magnolias have been planted in this area, and springtime is particularly colorful when the flowering cherry, wild lilac, camellias, Mediterranean broom, wild strawberry, and St.-John's-wort are in bloom. One bed is filled with star jasmine, which provides a delicious fragrance in the summertime.

Careful attention has been paid to the arrangement of the shrubs to provide interesting combinations of foliage, color, and texture, so that at all times of the year there will be something of special interest for the passerby to see.

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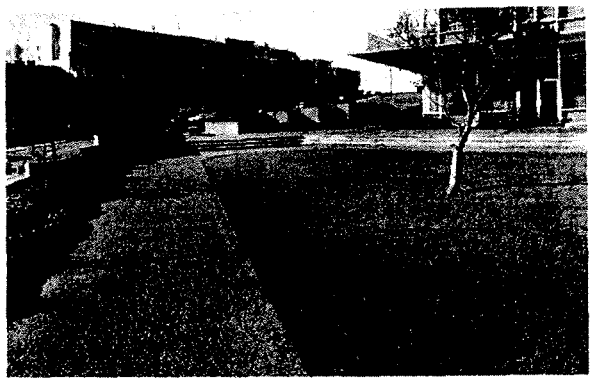

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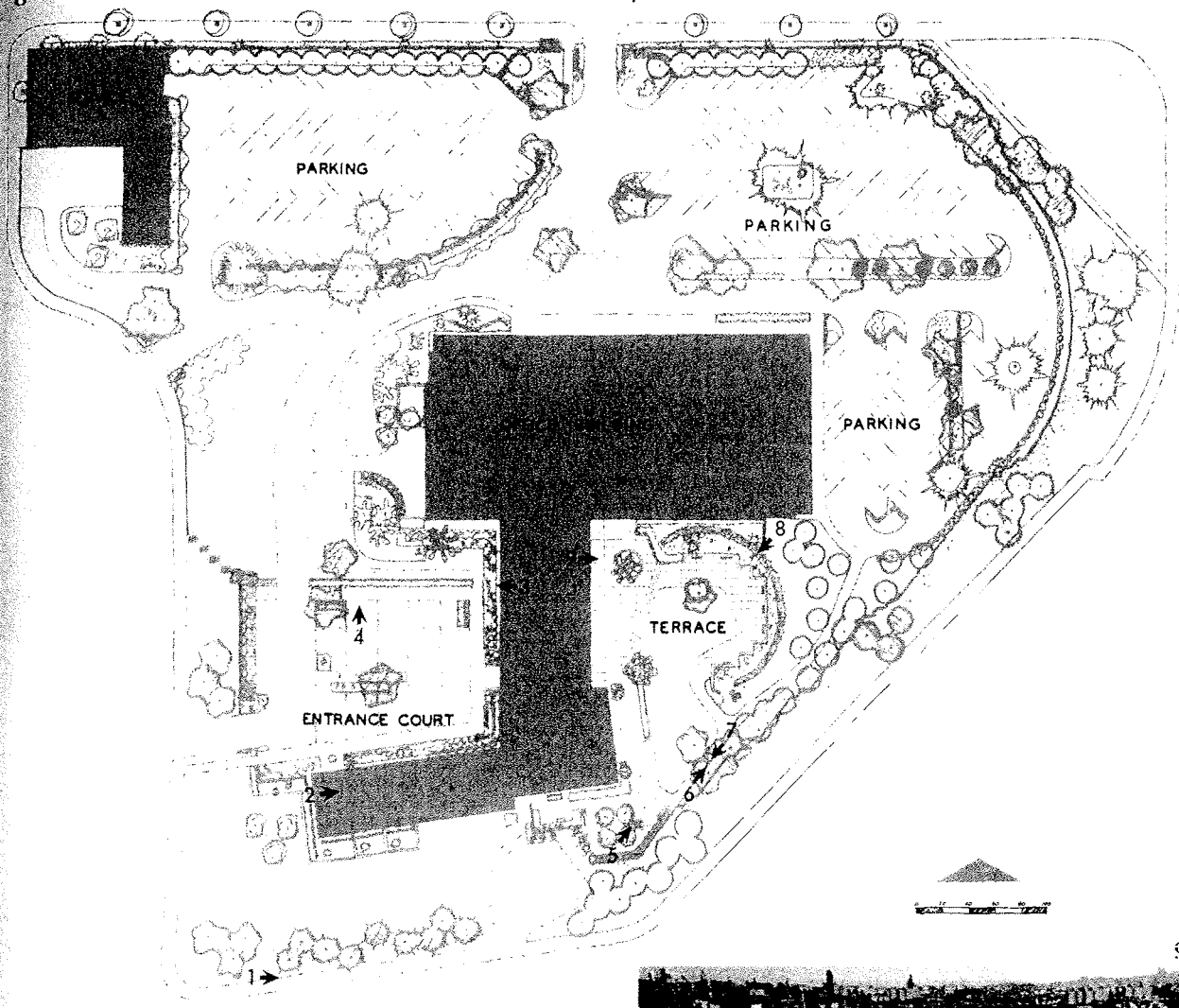

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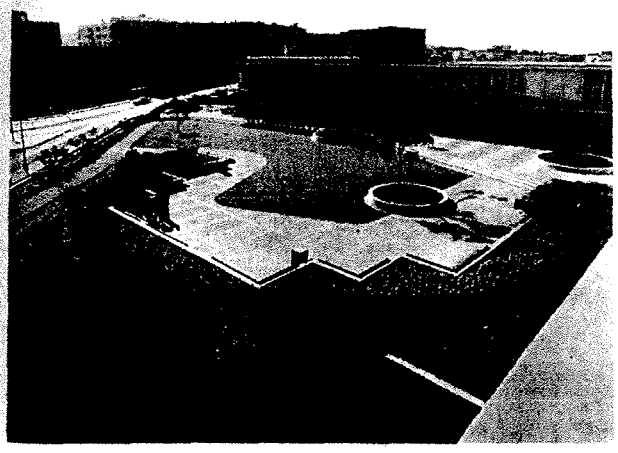

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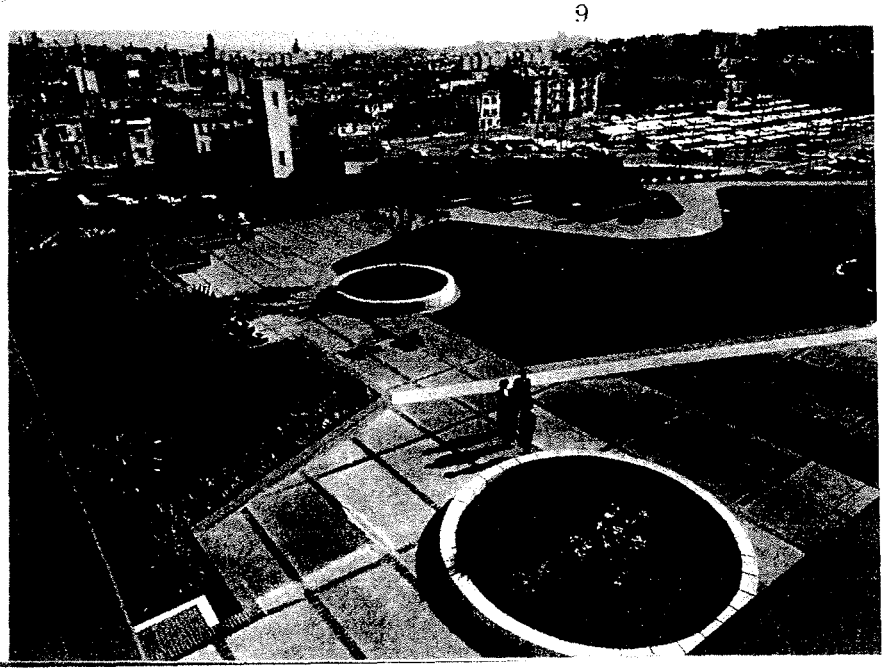


Re: 3333 California Street, San Francisco, CA
Record Number: 2015-014028ENV/CUA/PCA/MAP/DVA

Laurel Heights Improvement Association Appeal of Planning Commission's Certification of Final EIR/ CEQA Findings

Board of Supervisors File No: 191035

Exhibits to Statement of Petree A. Powell, MCP, JD

EXHIBITS F - H

EXHIBIT F

ARCHITECT AND ENGINEER

PACIFIC MUTUAL BUILDING

APRIL 1956

Vol. 205 No. 1

★

Cover Picture

NEW
PACIFIC MUTUAL
BUILDING
San Francisco, Calif.
Lloyd & Glynn,
Architects

One of San Francisco's newest downtown buildings. See page 10 for additional data.

ARCHITECT AND ENGINEER

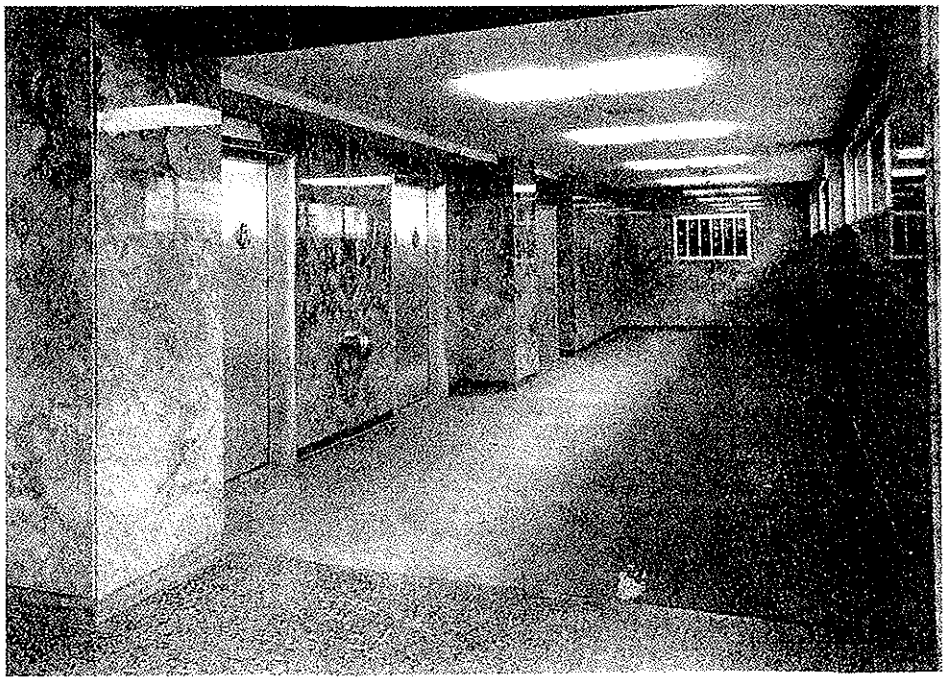
ARCHITECT & ENGINEER is indexed regularly by ENGINEERING INDEX, INC.; and ART INDEX

Contents for

APRIL

THE OLDEST PROFESSIONAL MONTHLY BUSINESS MAGAZINE OF THE ELEVEN WESTERN STATES

ARCHITECT AND ENGINEER (Established 1905) is published on the 15th of the month by The Architect and Engineer, Inc., 68 Post St., San Francisco 4; Telephone EXbrook 2-7182. President, K. P. Kierulff; Vice-President and Manager, L. B. Ponhorwood; Treasurer, E. N. Kierulff. — Los Angeles Office: Wentworth F. Green, 439 So. Western Ave., Telephone DUnkirk 7-8135. — Portland, Oregon, Office: R. V. Vaughn, 7117



ELEVATOR LOBBY

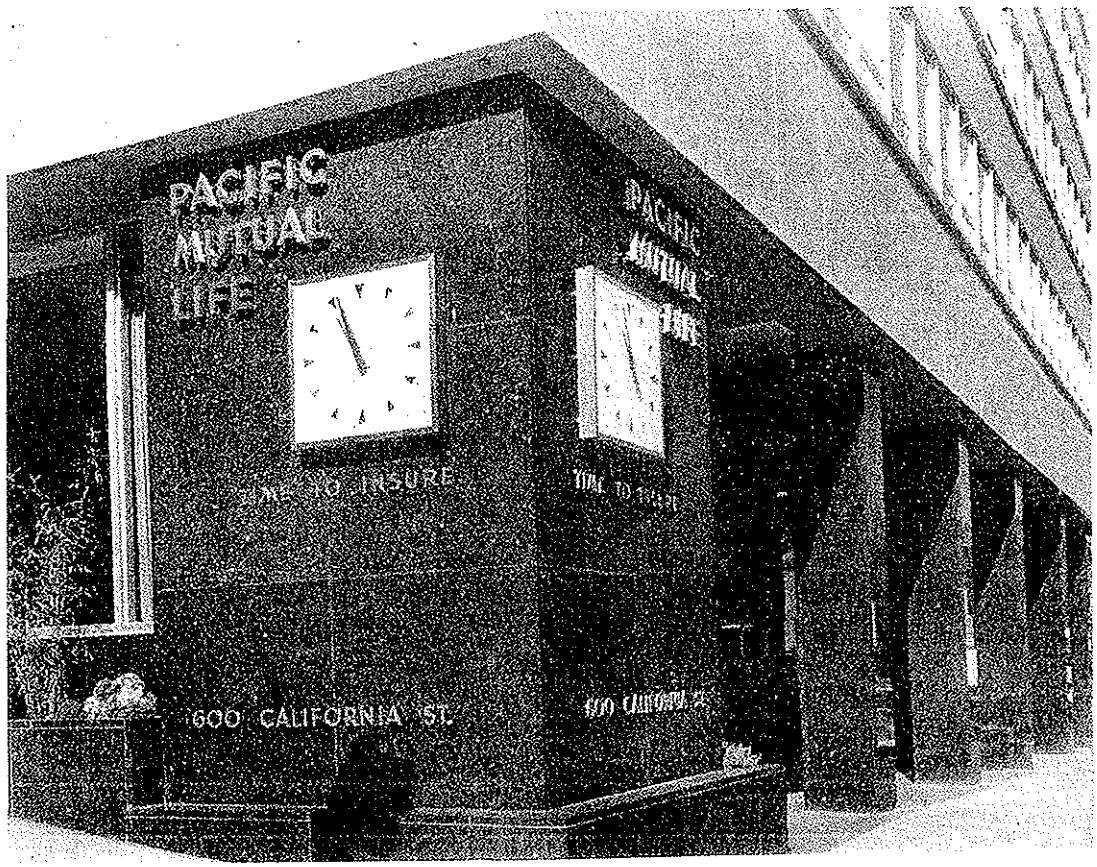
Pacific Mutual Life Insurance Company

San Francisco

Featured in the terrazzo floor entrance lobby is a deeply carved redwood plaque, nine feet in diameter, executed by Spero Anargyros, and depicting California's world famous giant redwood tree "Wawona," modeled after the Sequoia Big Tree in Yosemite National Park, and which is the Pacific Mutual's trade mark. The lobby itself is finished in red Porta Santa marble, imported from Italy.

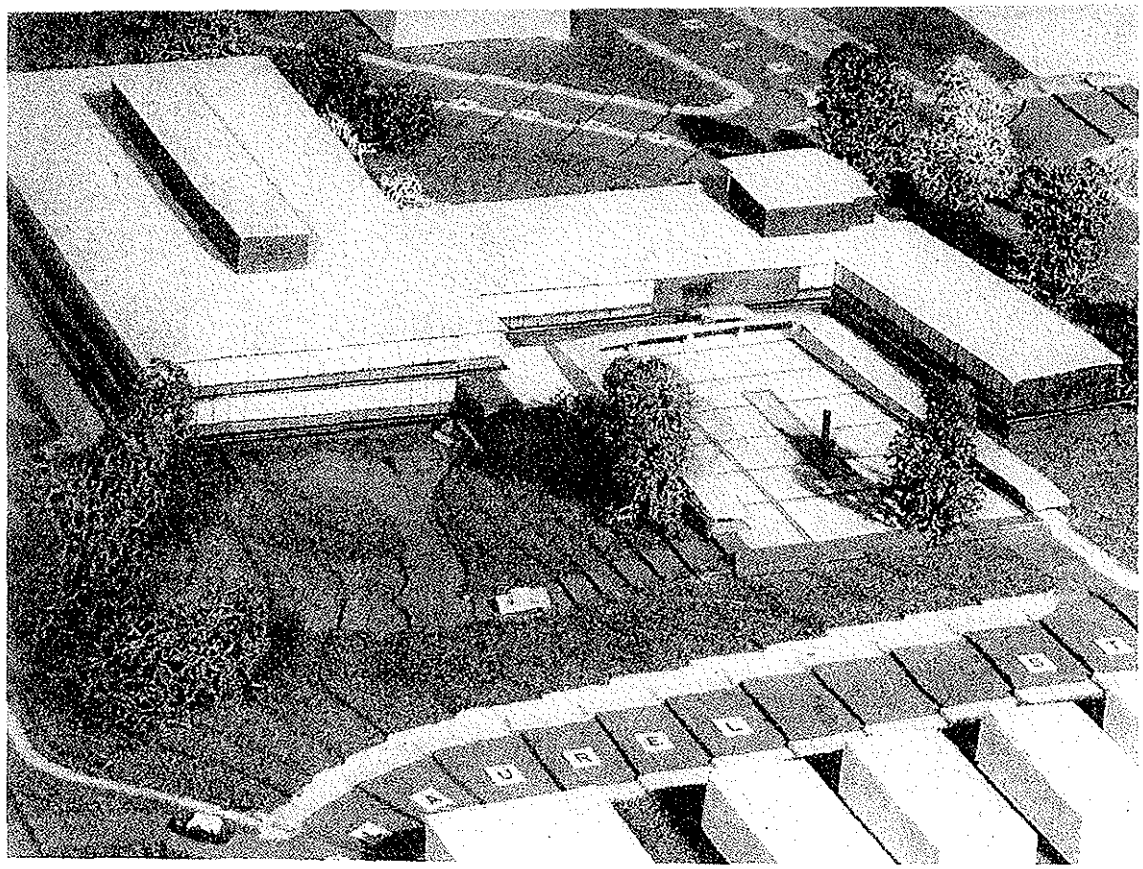
The entrance lobby is banked with the very latest equipment in elevator engineering. Automatic control replaces the old style cars with their attendant operators. A push button panel in each cage enables the passenger to reach his desired floor with dependable speed. Each car carries a maximum of 20 persons.

Now under construction is the home office building for the Fireman's Fund Insurance Group at California



STREET ENTRANCE

Pacific Mutual Life Insurance Company



MODEL of NEW HOME OFFICE BUILDING for Fireman's Fund Insurance Company, San Francisco
EDWARD B. PAGE, Architect

and Laurel Streets, San Francisco.

The horizontal, country-type structure will be unique among the typically vertical office buildings in San Francisco to conform to the lines of the surrounding area, which is predominantly residential. The 10-acre, tree-shaded lot is an historic site bounded by California Street on the north, Presidio Avenue on the east, Euclid Avenue on the south, and Laurel Street on the west.

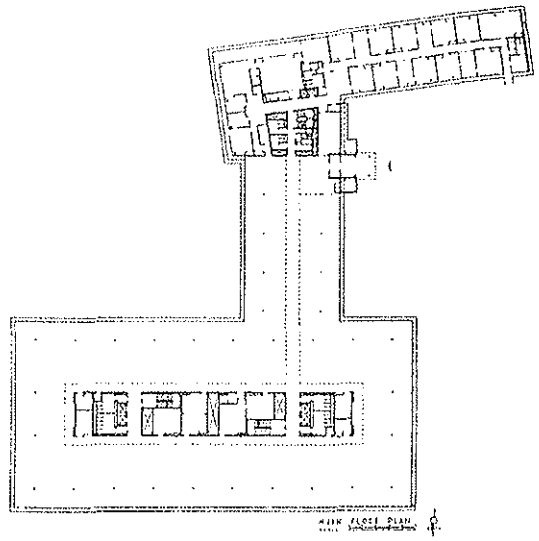
The structure, which will overlook San Francisco, has been designed to relate to its park-like setting. A flat roof will cover the 190,000 square feet of building area. Graduating from one floor, at the highest portion of the lot facing Laurel Street, to three floors facing California Street and Presidio Avenue, the building will have two main entrances—a formal court with parking facilities on Laurel Street and an entrance on California Street adjacent to an off-street parking area for more than 200 cars. The exterior of the building will be aluminum and glass with brick facing. Cantilevered construction will provide window walls on all floors.

Interior design and facilities of the completely air-conditioned building have been planned for the comfort and convenience of the company's staff of nearly 1,000. Highlighting this planning is a new concept of office lighting, area illumination, which will furnish maximum light quality for optimum working conditions. The modern lighting fixtures will be suspended above an open metal grid, so efficient area illumination will be achieved without the usual forest of visible fixtures. Pleasing, light colors on walls, floors and equipment will eliminate distracting contrasts and complement the over-all feeling of openness.

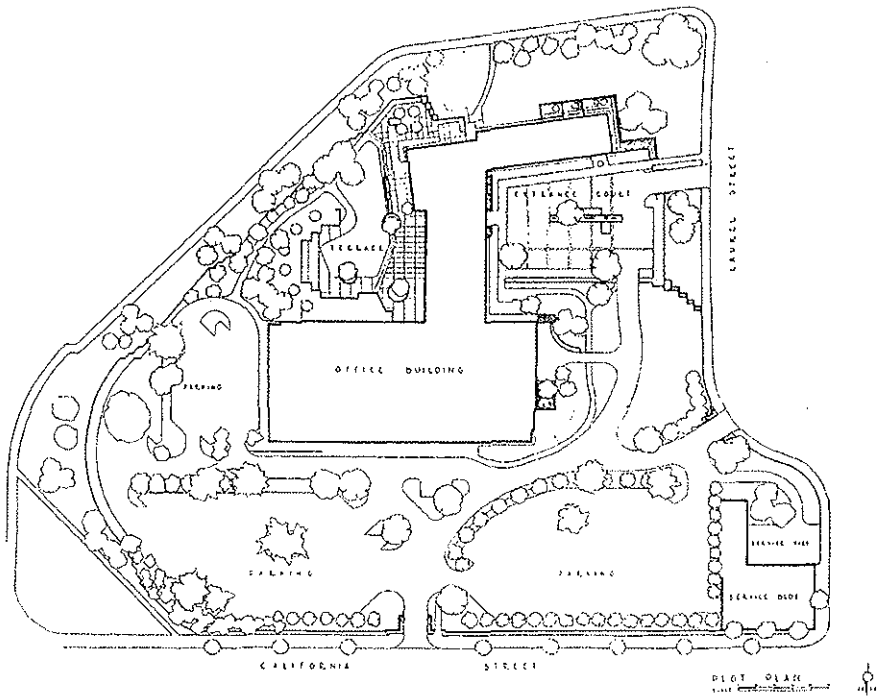
Although the major three-story working areas is almost the size of a football field — 300′ x 144′ — most employees will be no more than 40 feet from an outside window. Desk areas will surround a central "core" in which service facilities and conference rooms are grouped.

Sunny and light, yet efficient, the employee cafeteria will incorporate modern cafeteria practices in pleasant, relaxed surroundings. Planned to seat 400 employees at

MAIN FLOOR PLAN



PLOT PLAN



one time, the cafeteria can—when tables are removed—seat 800 people for large staff meetings. The cafeteria will open to a large, sunny wind-shielded terrace which will have facilities for relaxation and recreation.

Extensive landscaping will surround the Fireman's Fund plant. Of the total estimated $4 million cost, more than $3 million will go into the building proper, $600,000 on new furniture, and $300,000 on landscaping and parking facilities.

MEMORIAL TEMPLE

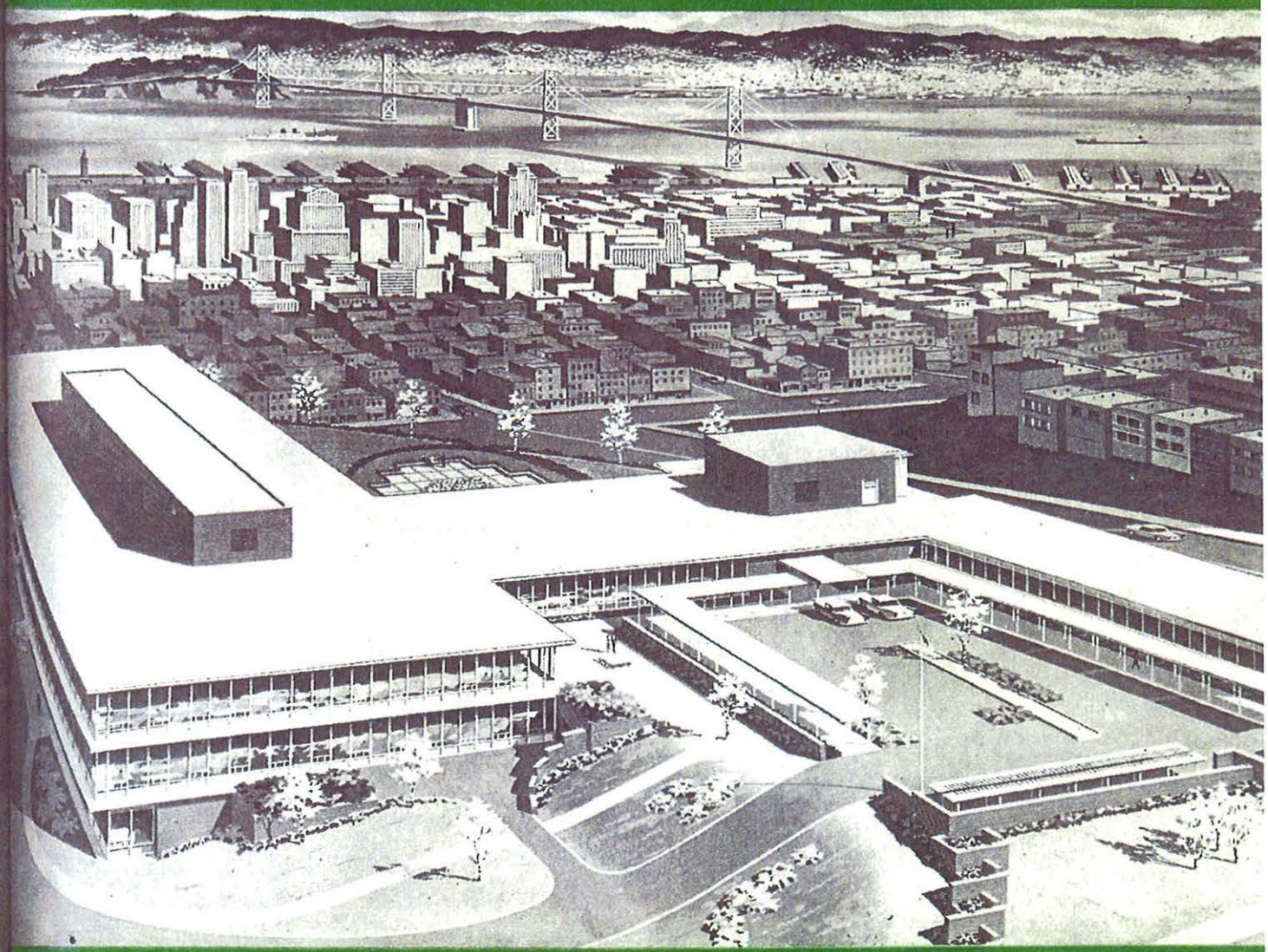
The new California Masonic Memorial Temple is the latest major contract to be awarded MacDonald, Young & Nelson, Inc. The structure will be located on the corner of Taylor and California Streets, San Francisco—one of the last historic sites on famed Nob Hill of early California history.

The $5,000,000 structure will be faced with white

EXHIBIT G

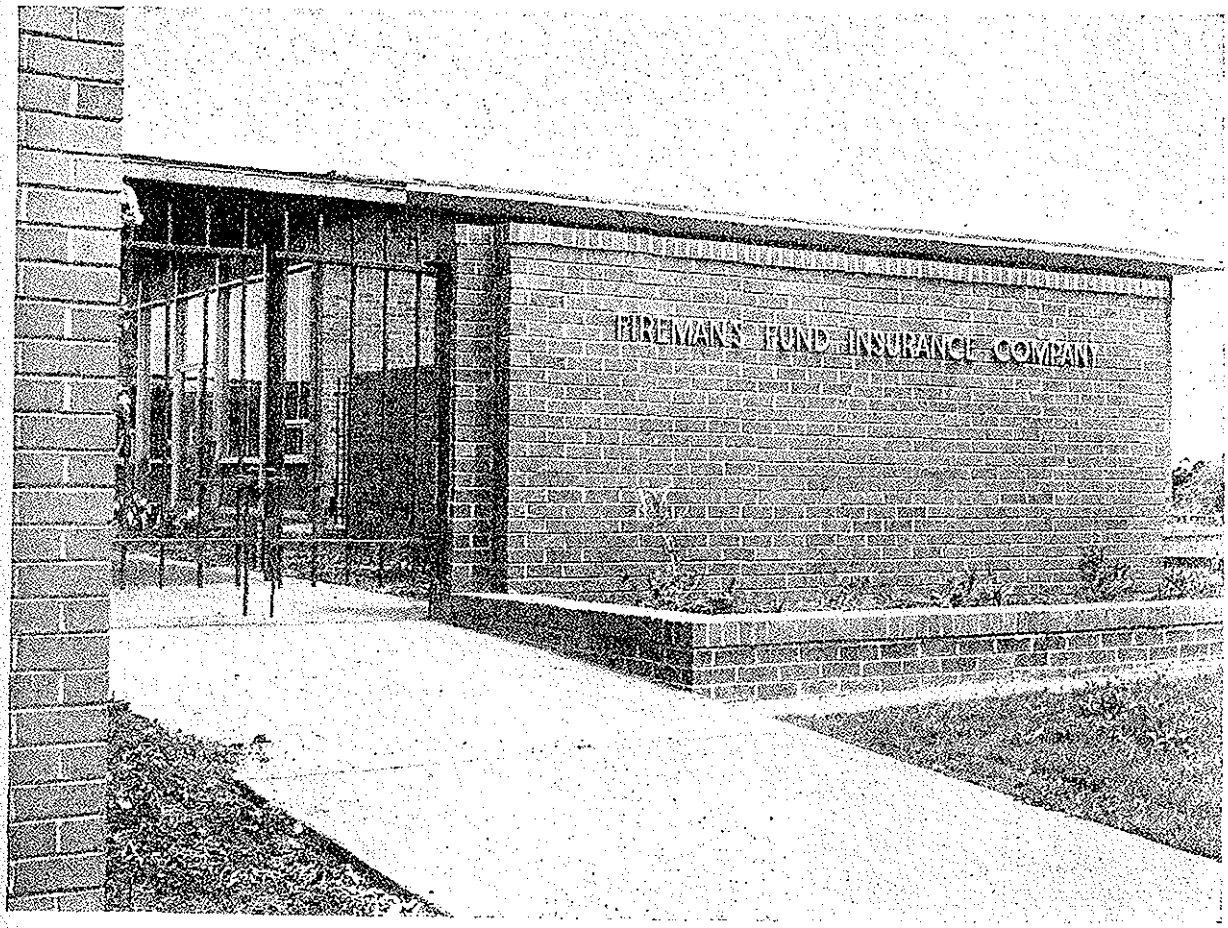
ARCHITECT AND ENGINEER

FIREMAN'S FUND INSURANCE COMPANY



SAN FRANCISCO, CALIFORNIA

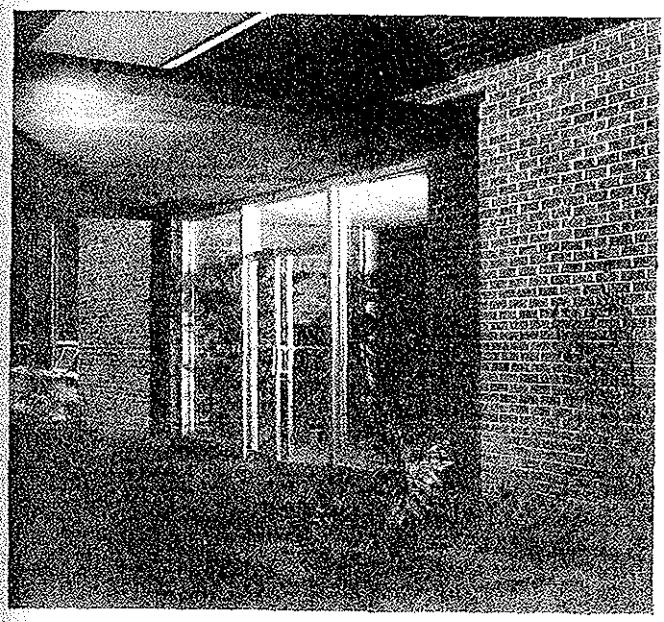
SEPTEMBER 1957



New Fireman's Fund Building

INCORPORATES MANY CONSTRUCTION INNOVATIONS AND IDEAS

SAN FRANCISCO, CALIFORNIA



Architect: EDWARD B. PAGE, A.I.A.

Structural Engineers: JOHN J. GOULD and HENRY J. DEGENKOLB

Mechanical Engineer: R. ROLLESTON WEST

Electrical Engineer: CLYDE E. BENTLEY

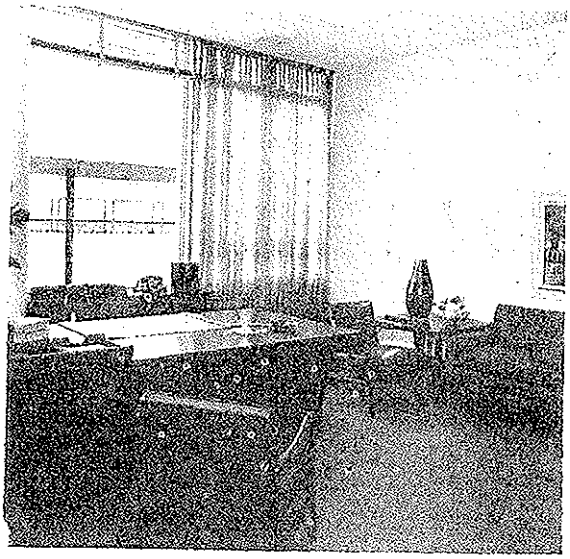
Interior Designer and Consultant: MAURICE SANDS

Landscape Architect: ECKBO, ROYSTROM & WILLIAMS

General Contractors: MacDONALD, YOUNG & NELSON

ENTRANCE is simple in design, opens onto the large court on Laurel Street—250 car parking area adjacent to California Street wing of the building.

FIREMAN'S FUND BUILDING . . .



EXECUTIVE OFFICE

Carpeted in two-tone teak brown, the entire Executive area adjoining Laurel Court is planned around variations of grayed blue-green, lacquer red and gold with neutral chamois-color walls and walnut furnishings.

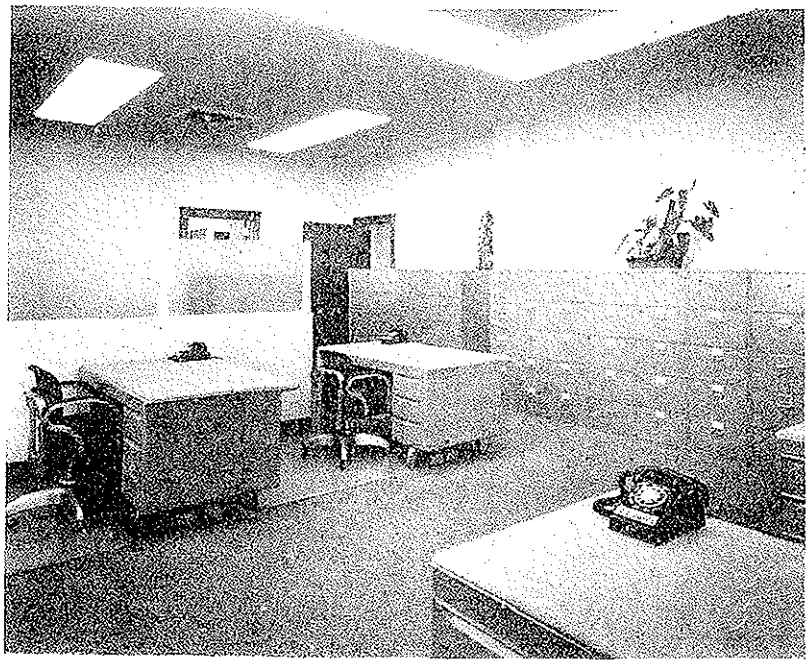
By GRAEME K. MacDONALD, President
MacDonald, Young and Nelson, Inc.
General Contractors

When the Fireman's Fund Insurance Companies decided to erect a new headquarters, they were determined that the new structure would be the finest and most efficient possible for the conduct of the firm's business and the welfare of its staff. Such ambitious requirements posed important challenges in the design and construction of the building. The result is that the building incorporates many new techniques and ideas.

One vital requirement was, that the main building should have the largest-possible un-interrupted floor and working area—an important consideration in the operation of a major insurance firm's Home Office. Likewise, particular attention had to be given to providing the greatest amount of daylight and other factors conductive to excellent working conditions for the Home Office staff of nearly 1,000 employees.

As a result of these and other requirements, the

EXECUTIVE WING is treated with fissured mineral tile to match the luxuriant appearance of surroundings. Light fixtures and air diffusers are recessed in pattern with the acoustical tile.



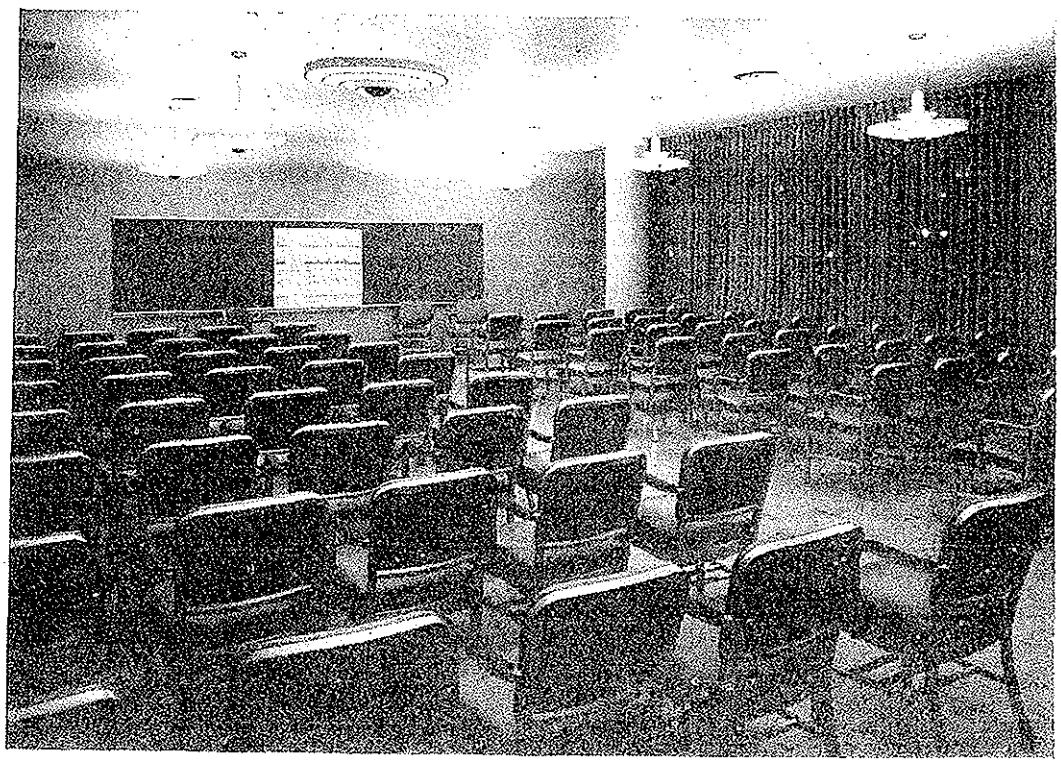
WORK AREA, EXECUTIVE WING

Furniture is finished in warm suede brown accented by bronze gold anodized aluminum trim, features modernaker style desks and posture chairs.

project's Architects and Engineers evolved a type of cantilevered construction which has been described as a "significant innovation in the commercial building field." This method made it possible to provide a 40-foot span from the core of the building to a series of support columns with an additional 15-foot cantilever to the outside wall of the building, plus a large overhang. This outside wall is actually a "curtain wall" composed entirely of windows, since the weight of the ceiling is borne by the series of columns.

UNIQUE CONSTRUCTION METHOD USED

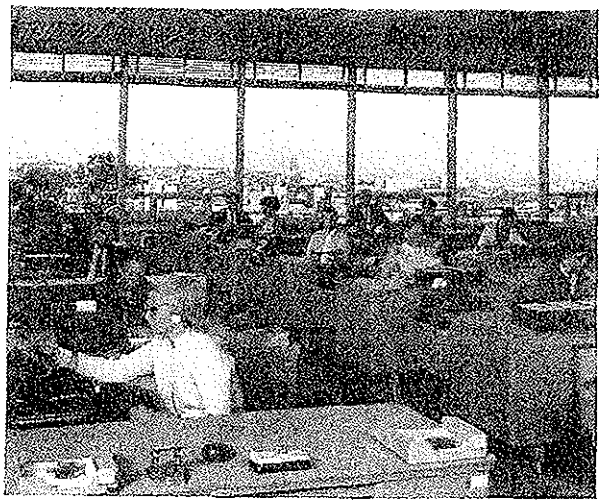
Since the maximum utilization of inside space, with the least possible interruption, was regarded as vital, the bearing columns had to have high loading for their size. But, there was a problem: suitable solid steel beams to handle this load were not available as a practical matter. To solve this problem, a method of



CLASSROOM

One of two such areas, is equipped with sound projection equipment, blackboards and display facilities for use of Educational Department.

Completely air conditioned.



ACCOUNTING DEPARTMENT

Centered on Terrace Level of California Street wing . . . glare-free light and surrounded by easy on the eyes color scheme.

construction was adopted which is, as far as we know, unique. Instead of solid steel beams, we built up these support columns from laminated steel plates held together by massive high strength bolts, thus achieving the effect of a solid mass of steel measuring eight inches on one side by eight to twelve inches (depending on the requirements for a specific column) on the other.

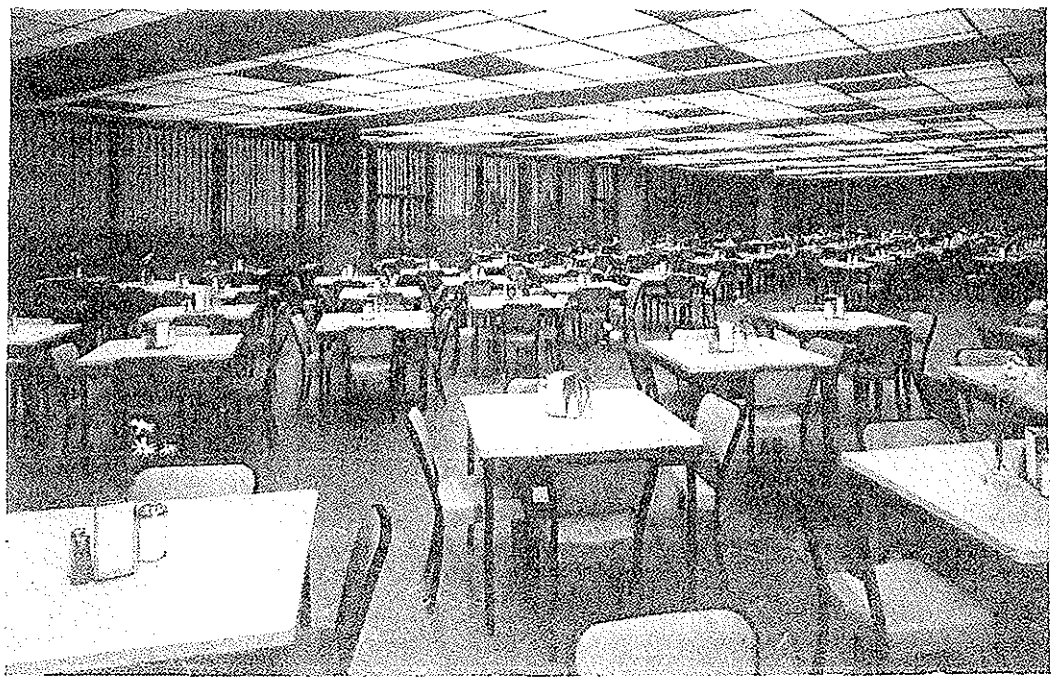
The net result of this construction method was that it was possible to have the columns' finished dimensions (after the plaster was applied) of no more than 12 inches on one side and from 12 to 20 inches on the other — far smaller than would have been required by conventional methods. The effect in these large room areas is one of extreme lightness and openness.

The core of the building, at which one end of the floor is anchored, takes care of any horizontal load. The concrete core, in a three-level section, was heavily reinforced with 14-inch walls. The girders are of reinforced concrete at 30 foot intervals. The structural framing between the girders is by reinforced concrete joists on 35½ inch centers.

The construction features just described apply to the three-story-high California Street wing of the building which, because it is the largest, is usually referred to as the "main building," but is properly referred to as the "California Avenue Wing." However, the building also has a center section, referred to as the "Laurel Street Wing," and on the South end, the "Euclid Avenue Wing." These two wings are two stories high.

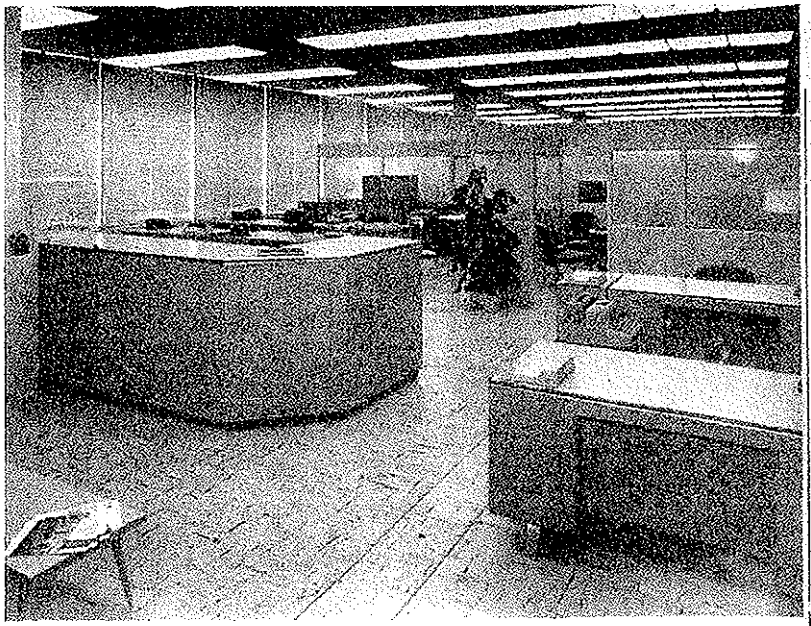
Although these two latter wings are important parts of the entire building, they posed no particular problems from the standpoints of design or construction. Like the rest of the building, these wings are built of reinforced steel and concrete. The entire building has a uniform appearance.

Another structural innovation was the burying of



EMPLOYEES' CAFETERIA

Colorful, clean, pleasant cafeteria—aluminum chairs and tables; upholstered chairs in pale yellow plastic and raspberry plastic.



MODEL AGENCY OFFICE

Park Level

Semi-permanent display of typical insurance agency office illustrates vividly equipment and furniture installation.

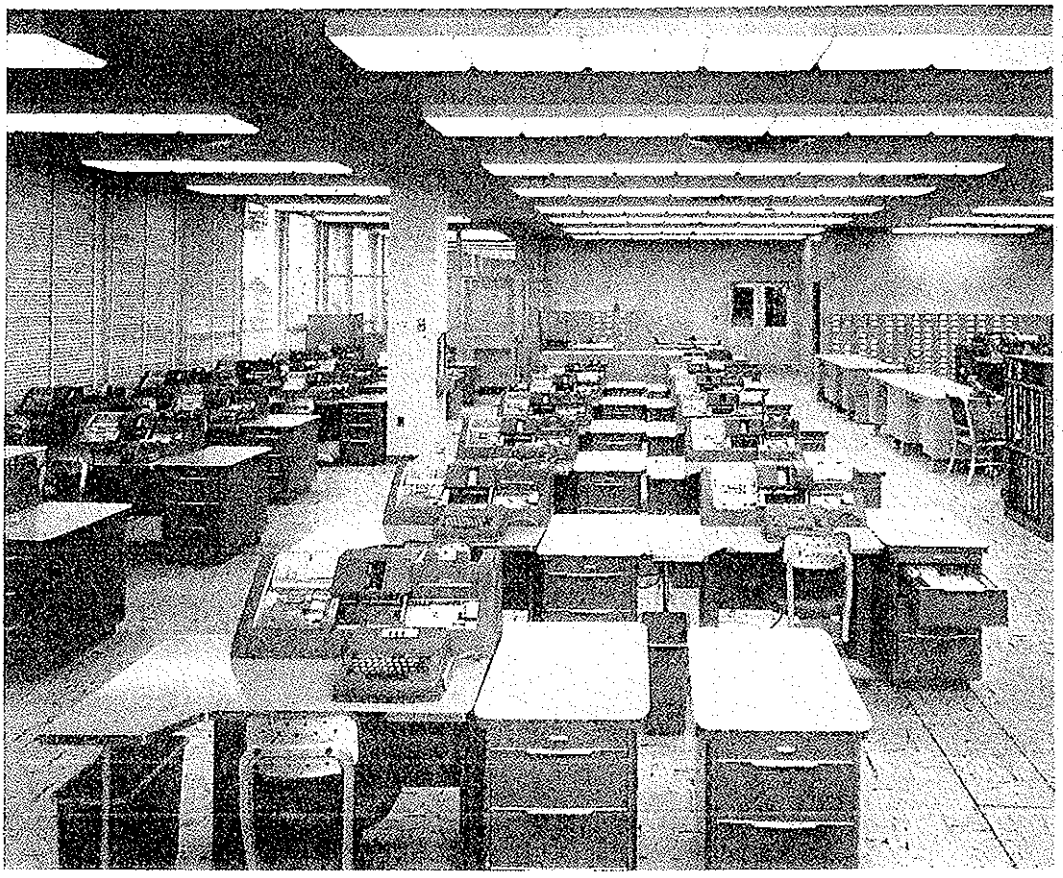
Photo Courtesy General Fireproofing Co.

Walker Ducts for electrical conduits in 4½ inch structural concrete floor slab. This differs from ordinary procedure in that normal non-structural concrete fill was eliminated.

BUILDING EXTERIOR ALL WINDOWS

The exterior of the building is glass with aluminum window casings. Nearly an acre of glass was required for the floor-to-ceiling exterior of the structure. The spandrels on the lower part of each window are a heat-strengthened glass with ceramic color fused on. As a result, the building has no wood or other surfaces requiring painting. The only exterior upkeep required is washing windows—a job which is facilitated by the wide flat roof overhang which serves as a working platform.

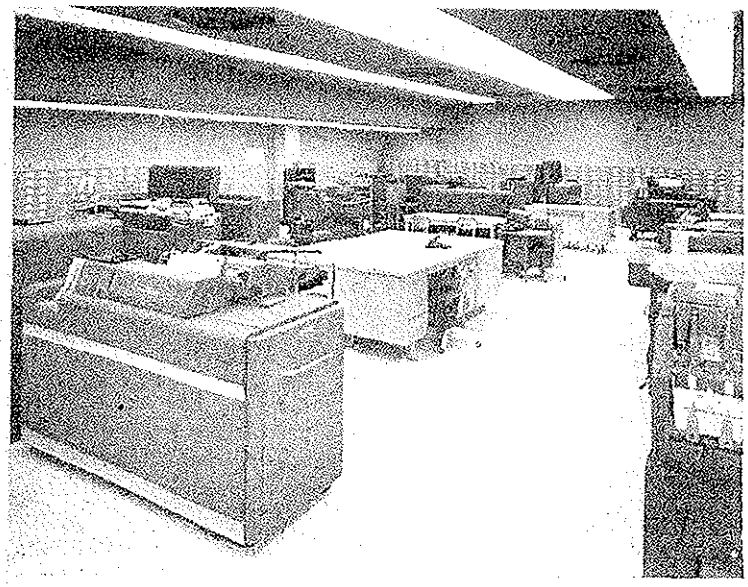
The three-level main portion of the building covers



PARK LEVEL

Combined overhead lighting and natural daylight at a side of this modern office area offers a perfect combination for automatic machine operators.

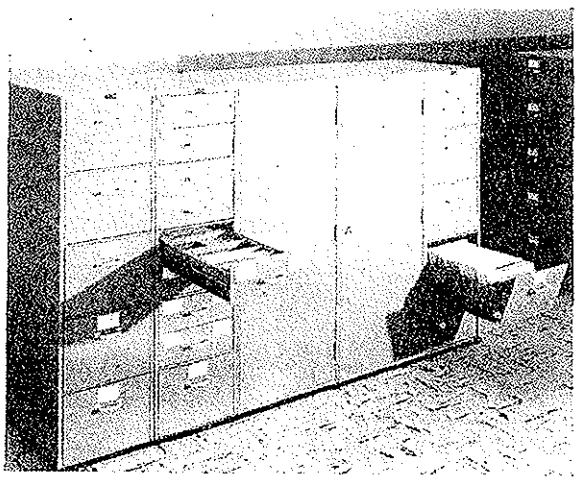
Photo Courtesy General Fireproofing Co.



TABULATION ROOM ON PARK LEVEL

Illustrates portion of automatic tabulating machines which are in constant use . . . room is lined with tabulating card files. Overhead lighting, ventilating and air conditioning.

Photo Courtesy
General Fireproofing Co.



NEWLY DESIGNED
"Point of Service" storage

300 by 144 feet—the size of a football field. It is laid out in such a way that most employees are within 45 feet of an outside window.

The entire building provides 195,000 square feet. It has been estimated that, if the building were on an average 100 foot square downtown lot, it would have to be 20 stories high and would have cost another million dollars to build.

The building has been planned for an expansion factor of 30 per cent. Future needs will be satisfied by adding a complete floor above the present floors or by adding wings.

BUILDING TAKES SMALL PART OF LAND AREA

Actually, the building takes only a minor fraction of

COURT LEVEL

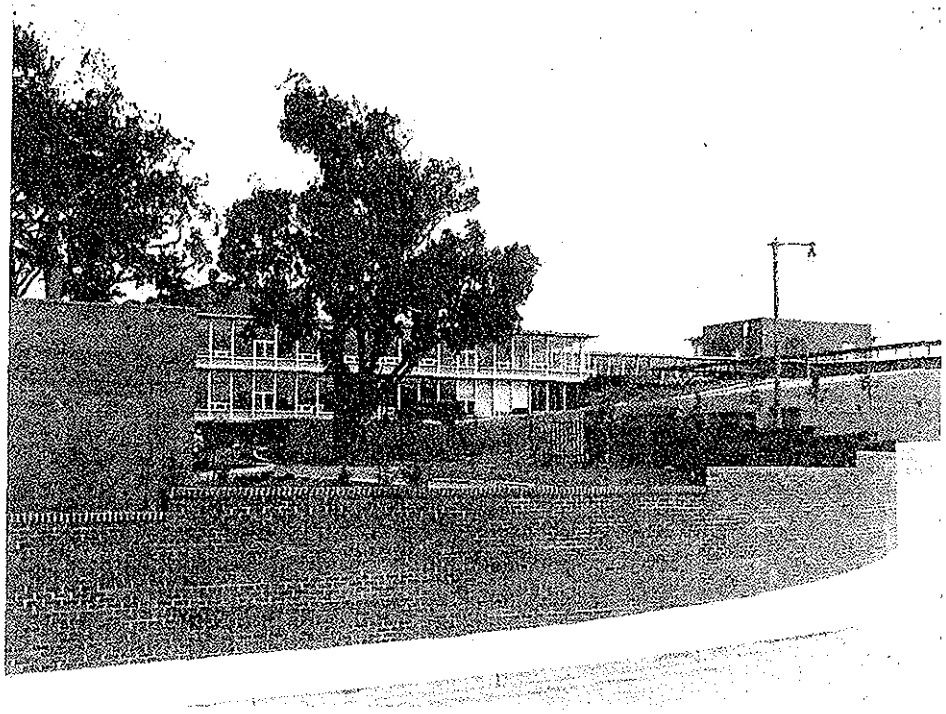
Illustrates the spaciousness of the general office area. Indirect lighting together with the modern office equipment and file system contribute to comfort of employees.

Photo Courtesy
General Fire Proofing Co.

POPULAR BRICK

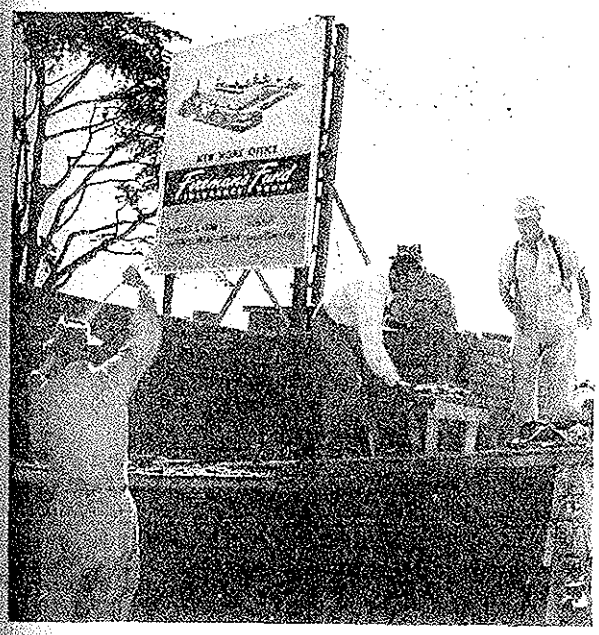
Some 500,000 bricks were used in the grouted brick masonry wall and building trim.

Photo Courtesy United Materials and Richmond Brick Co.



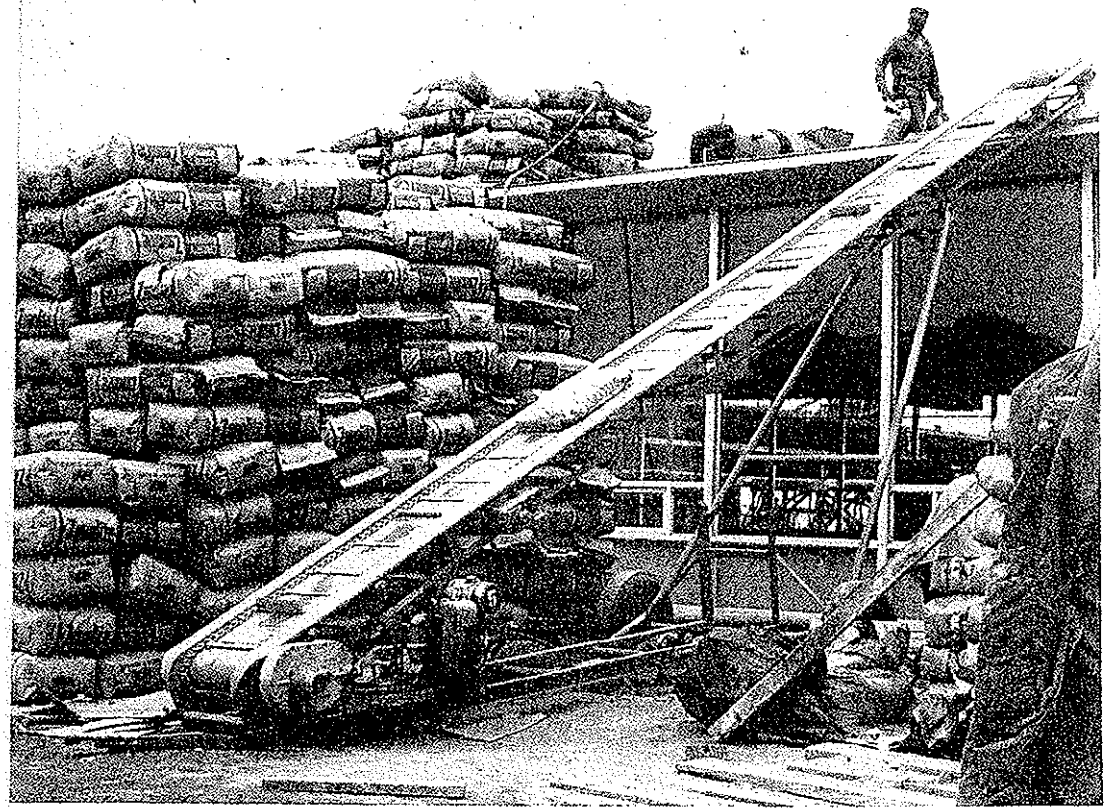
the property's 10.2 acres. The building itself occupies 1.74 acres, and there are 2.75 acres of off-street parking for more than 250 cars. On the rest of the land area, a truly superb job of landscaping has been done. This includes 110 varieties of trees, plants and ground cover that give the area surrounding the building a park-like aspect.

The entire building is completely air-conditioned,



BRICK MASONS doing their part in constructing this modern building.

Photo Courtesy, George W. Reed & Co.



ROOF FILL

Preparation of final roof construction included a large quantity of a soft concrete roof fill.

Photo Courtesy Fraser-Edwards Co.

and the indoor climate is controlled by two boilers and two large cooling units. A low-level, high fidelity sound system has been installed for music and occasional special announcements. Nearly 600 speakers are set above the louvered metal "ceiling."

In the core of the California Street Wing, there are three fully automatic elevators. The Euclid Avenue Wing has one hydraulic elevator.

A few figures indicate the size of the new Fireman's Fund headquarters. The equivalent of 50 freight car loads of steel—1,500 tons—were used. A total of 70 miles of copper were needed to bring power for lights and equipment to every corner of the building. The new furniture for the building filled 45 freight cars when it was shipped by the manufacturer. More than 500,000 bricks went into the grouted brick masonry wall and building trim.

ALL-AROUND CO-OPERATION RESULTED IN A SMOOTH, SWIFT PROJECT

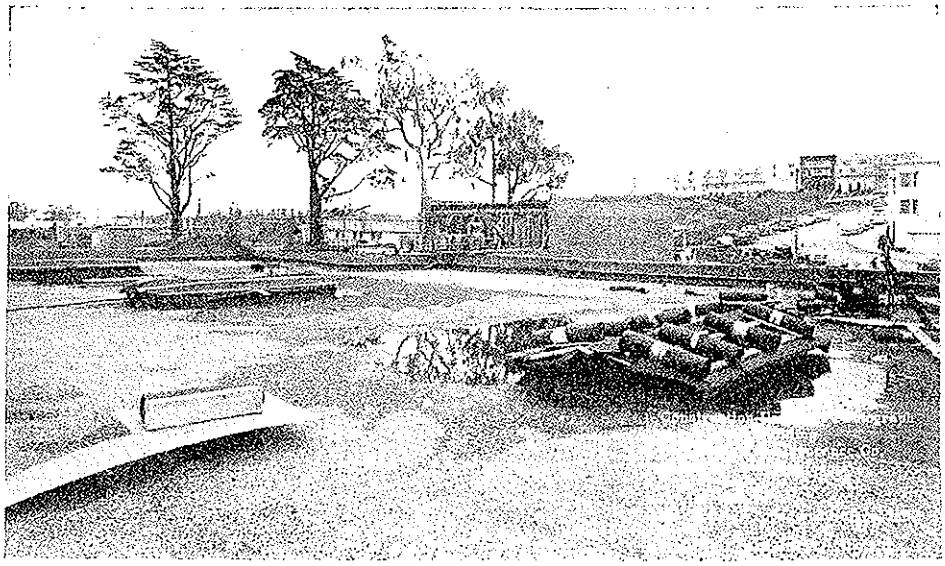
Ground was broken on the project in August, 1956. The building was completed in early June and occupied on June 17, 1957.

It would be difficult to imagine a construction project which, as a practical matter, could have gone

ROOF

Is completely damp and water proofed, with tar paper and gravel finish.

Photo Courtesy Regal Roofing Co.



more smoothly, and with more pleasant relationships all around, than the Fireman's Fund Headquarters Building. The outside success of the building and the notable innovations in its structure, were the result of an "all hands" effort. Obviously, it was a pleasure to work with, and for, the management personnel of Fireman's Fund. It was a particular privilege, also, to be associated with such people and firms as:

Edward B. Page, A.I.A., the Architect
John J. Gould and Henry J. Degenkolb, Structural Engineers
R. Rolleston West, Mechanical Engineer
Clyde E. Bentley, Electrical Engineer
Maurice Sands, Interior Designer and Consultant
Eckbo, Royston and Williams, Landscape Architects

And, last but not least, I would like to give credit, also, to all the personnel of MacDonald, Young and Nelson, who, from top to bottom, played important roles in doing a fine job in which we all take immense pride!

EXHIBIT H

3333 CALIFORNIA STREET SAN FRANCISCO, CA

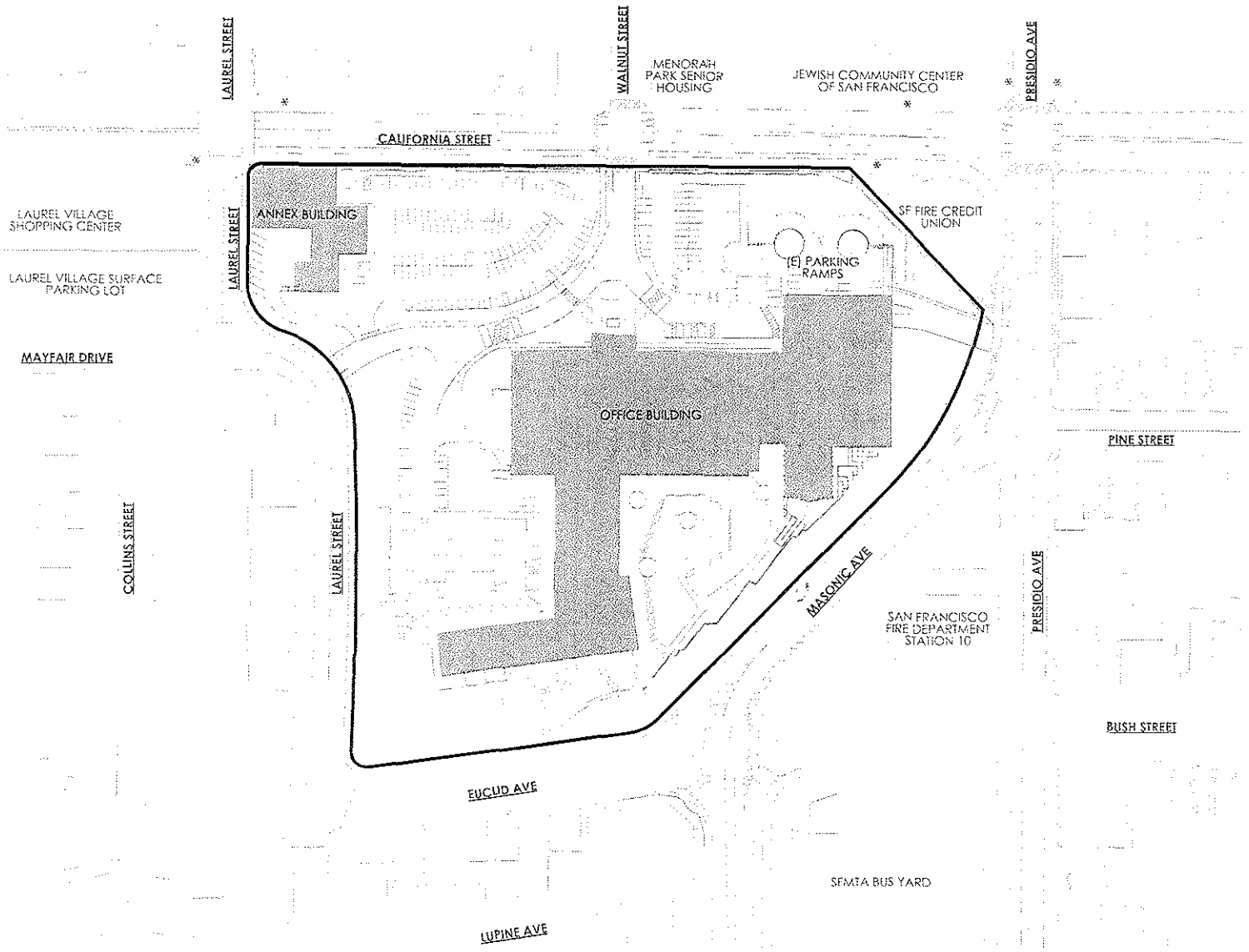
LANDSCAPE SITE PLAN

SKS | JAMES CORNER FIELD OPERATIONS | LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 25 50 100 150

VAR.04



* DENOTES (E) BUS STOP

3333 CALIFORNIA STREET SAN FRANCISCO, CA

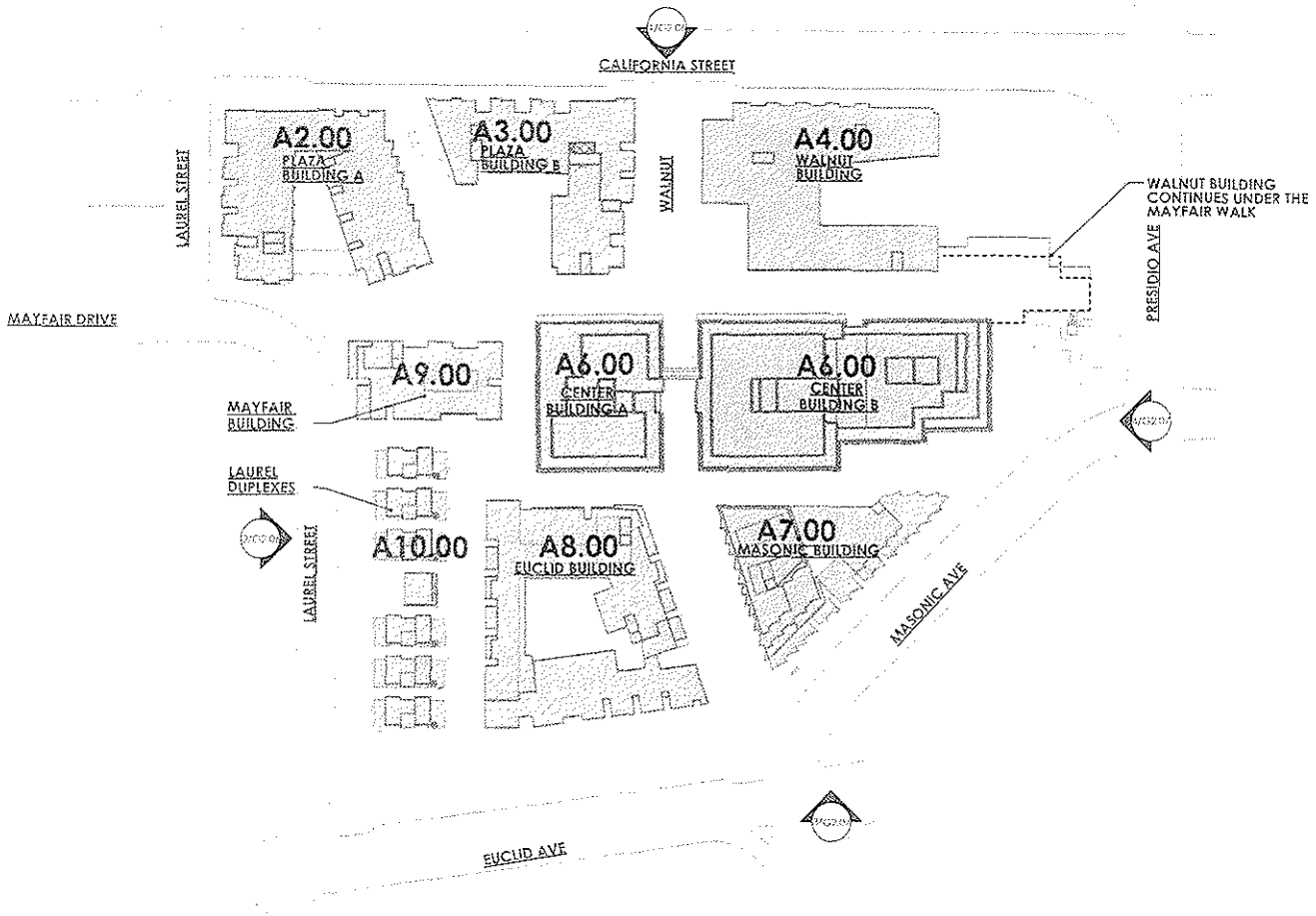
SITE PLAN - EXISTING

SKS | JAMES CONNER FIELD OPERATIONS | SLA ARUP BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30' 60' 120' 180'

G1.04



FOLLOWING THE PPA SUBMITTAL THE "PRESIDIO BUILDING" WAS REMOVED FROM THE PROJECT - A5 SERIES IS OMITTED FROM DRAWING SET.

3333 CALIFORNIA STREET SAN FRANCISCO, CA

KEYING SITE PLAN - PROPOSED

SKS | JAMES CORNER FIELD OPERATIONS | SLA | ARUP BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30 60' 120' 180

G1.05

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November 6, 2019
3333 California Street
San Francisco, California

Use of Secretary of Interior's Standards as Mitigation for Significant Impacts

INTRODUCTION

This report evaluates the feasibility of use of *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, Weeks & Grimmer (1995) (Secretary's Standards) as design Guidelines to mitigate adverse impacts of the proposed Project and proposed Project Variant for 3333 California Street (collectively "Proposed Project," unless otherwise indicated). (Ex. A, excerpts, Secretary's Standards and Guidelines) The site is recognized as a masterpiece of modern architecture artistically designed with a landscape that is integrated with building forms to create a seamless connection between indoor and outdoor spaces.

The Fireman's Fund Insurance Company Home Office located at 3333 California Street is listed as a historic resource in the California Register of Historical Resources. (Ex. C) The California Environmental Quality Act, Public Resources Code sections 21000 *et seq.* (CEQA) provides protection for historic resources listed in the California Register of Historical Resources and deems a project that may cause a substantial adverse change in the significance of a listed historical resource "a project that may have a significant impact on the environment."

CEQA specifically identifies the historical design Guidelines set forth in the Secretary's Standards as the methods for mitigating impacts upon a historic resource. 14 Cal.Code Regs. section 15126.4(b)(1) and (2). The Secretary's Standards contain both general standards and very specific design Guidelines that provide very detailed instructions on methods that will mitigate impacts. However, the EIR for the Proposed Project failed to discuss use of the Secretary's Standards as measures to mitigate the Project's impacts upon the historic resource, and thus failed to provide the information required to be set forth in an EIR that would have been highly important to the decisionmaker and the public.

Pursuant to Public Resources Code section 21002.1(a), the purpose of an environmental impact report (EIR) is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. The Legislative mandate for mitigation or avoidance of significant effects on the environment where feasible is set forth in Public Resources Code section 21002.1 (b), as follows:

> Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.

The informational failure of the EIR violated fundamental CEQA requirements that an EIR "shall describe feasible measures which could minimize significant adverse impacts." 14 Cal. Code Regs. sections 15126.4(a)(1), 15121(a); Public Resources Code sections 21002.1(a), 21100(b)(3).

Moreover, the failure to discuss the mitigation that could be provided by application of the Secretary's Standards violated the special CEQA rule applicable to historical resources that makes it mandatory for the lead agency to identify potentially feasible mitigation measures:

> A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. 14 Cal.Code Regs. section 15064.5(b)(4).

The Draft EIR states that the developer's Proposed Project would cause a substantial adverse change in the significance of the historical resource at the property, so it was certainly mandatory that the EIR analyze potential measures that could mitigate the physical impacts upon the historic resource that the Project would cause, and the failure of the EIR to do so violated CEQA. (FEIR 4.B.41) Where the failure to comply with CEQA "results in a subversion of the purposes of CEQA by omitting information from the environmental review process, the error is prejudicial." *Rural Landowners Association v. Lodi City Council* (1983) 143 Cal.App.3d 1013, 1023. Here, the decisionmaker and public were not informed of State-sanctioned Guidelines that specified methods that would mitigate adverse impacts.

This analysis will discuss specific design Guidelines set forth in the Secretary's Standards that can reduce adverse impacts to character-defining features of the historic resource located at 3333 California Street. A mitigation measure may reduce or minimize a significant impact without avoiding the impact entirely. 14 Cal.Code Regs. section 15370(b); Public Resources Code sections 21002.1(a), 21081(a)(1), 21100(b)(3).

The Draft EIR failed to discuss use of these Guidelines as mitigation measures to reduce adverse impacts of the Proposed Project on one of more character-defining characteristics of the resource. (Ex. B, DEIR 4.B. 46-48) The Draft EIR merely discussed mitigation measures consisting of documentation of the resource by photographs and other means, which do not reduce actual physical impacts on character-defining features of the resource. (DEIR 4.B.46-48)

CEQA requires analysis of both mitigation measures and alternatives. Alternatives provide less flexibility to the decisionmaker because they present fixed configurations of alternative site plans. (DEIR 6.1-6.218) However, use of the Secretary's Standards and Guidelines provides a full collection of measures that can be used to mitigate significant effects on character-defining features of a historic resource whenever feasible. A full mitigation measure compilation also provides information that is important to members of the public in formulating modifications that can be requested to reduce impacts on a historical resource. Despite the fact that CEQA requires

analysis of both mitigation measures and alternatives, the EIR for 3333 California Street only evaluated alternatives that could reduce some physical effects of the Proposed Project.

METHODOLOGY

I reviewed the project description, mitigation section, and alternatives discussion of the Draft EIR, pertinent excerpts of the architectural plans for the Proposed Project and the Secretary of the Interior's Standards Compliancy Evaluation for 3333 California Street prepared by TreanorHL, October 2, 2019. I also reviewed the Preservation Alternative – Feasibility Evaluations for 3333 California Street prepared by TreanorHL, August 20, 2019. In addition, I reviewed the nomination of the site for listing on the National Register, which was approved by the State Historical Resources Commission.

FEASIBILITY SUMMARY

The CEQA Guidelines specify that project modifications which conform with the Secretary's Standards are means to reduce or eliminate significant impacts on the historic resource, as follows:

> (1) Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.
>
> (2) In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur. (14 Cal.Code Regs. section 15126.4(b)(1) and (2))

With respect to the Proposed Project, the EIR admits that documentation would be inadequate to reduce the adverse impact on the resource to a less than significant level. (FEIR 4.B.41, 4.B.45-47) It should be noted that destruction of a historic resource is irreversible. Likewise if a historic resource loses its essential character-defining features, the resource is destroyed and such destruction cannot be reversed. It is the nature of resource. Historic resources are placed on the national, state and/or local registers because they have some unique affiliation with time, whether it be its architecture, its architect, its engineer, its landscape design, its landscape architect or affiliation with a historic event or person. Not all old structures and sites are nationally, regionally or locally considered worthy of inclusion on a historic register. There must be some feature, some connection to a building style, some uniqueness to the place, building and/or site, or some connection to a person or event in history. If one would tear down the house where Abraham Lincoln wrote the Gettysburg address, it could not be rebuilt and say to the

world, this is where Abraham Lincoln wrote the Gettysburg address. The historic place is simply gone and we are the lesser for it.

The same is true when you strip a historic resource of its essence, even if some hints remain. Here the Proposed Project strips the historic resource of its essential and character-defining features, namely the horizontality of the Office Building, the Terrace, and the landscaping (both hard and soft) from Presidio, Masonic, Euclid to Laurel. Demolishing half the structure that seamlessly blends into the slope of the hill, removing the unique garden Terrace and replacing it with a triangular shaped monolithic structure, and removing the hard and soft landscaping that melds the building into the hillside minimizing the impact to the surrounding homes, is in fact a complete destruction of the essence of the historic resource itself. This is precisely why CEQA prescribes the Secretary of Interior's Standards and Guidelines to mitigate a project's impact on a historic resource's character-defining features.

The requirement that an EIR present information as to feasible mitigation measures and alternatives implements fundamental legislative policies:

> The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives ***or*** feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives ***or*** feasible mitigation measures which will avoid or substantially lessen such significant effects. (Public Resources Code § 21002, emphasis added)

Identification of mitigation measures and alternatives is a fundamental purpose of an EIR:

> In order to achieve the objectives set forth in Section 21002, the Legislature hereby finds and declares that the following policy shall apply to the use of environmental impact reports prepared pursuant to this division: (a) The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. (b) Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so. (Public Resources Code § 21002.1)

Mitigation measures and alternatives are to be discussed in separate sections of the EIR:

> (a) All lead agencies shall prepare, or cause to be prepared by contract, and certify the completion of, an environmental impact report on any project which they propose to carry out or approve that may have a significant effect on the environment. Whenever feasible, a standard format shall be used for environmental impact reports. (b) The environmental impact report shall include a detailed statement setting forth all of the following: (1) All significant effects on the environment of the proposed project. (2) In a separate section: (A) Any significant effect on the environment that

> cannot be avoided if the project is implemented. (B) Any significant effect on the environment that would be irreversible if the project is implemented. (3) Mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. (4) Alternatives to the proposed project. (5) The growth-inducing impact of the proposed project. (Public Resources Code § 21100; 14 Cal. Code Regs. § 15126(e) and (f))

The CEQA Guidelines also require that the EIR distinguish between the mitigation measures proposed to be included in the Proposed Project and other measures which are not included but could reasonably be expected to reduce adverse impacts:

> 15126.4 CONSIDERATION AND DISCUSSION OF MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT EFFECTS. (a) Mitigation Measures in General. (1) An EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy. (A) The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR. (B) Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures shall not be deferred until some future time. (14 Cal. Code Regs. § 15126.4)

A mitigation measure may reduce or minimize a significant impact without avoiding the impact entirely. (14 Cal.Code Regs. section 15370(b, defining mitigation as including "[m]inimizing impacts by limiting the degree or magnitude of the action and its implementation.)

Use of one or more of the Secretary's Standards as design Guidelines would substantially reduce adverse impacts of the Proposed Project on various character-defining features of the 3333 California Street historical resource. The Rehabilitation Standards acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building's historic character. (Ex. A, Secretary's Standards, p. 2) However, the Draft EIR failed to evaluate use of any of the design Guidelines set forth in the Secretary's Standards as mitigation measures which could reduce or avoid adverse physical effects of the Proposed Project on one or more of the character-defining features of the listed historical resource. (Ex. B, DEIR 4.B.45-4.B.47)

It is feasible to design aspects of the Proposed Project according to the Secretary's Standards in part because a substantial portion of new construction can be located in the place of parking lots along California Street, where height limits can be increased.. The developer's design proposes to increase heights in those areas. Also, a new Mayfair building could be constructed, as proposed in the developer's plans. In addition, the main building can be converted to residential

use while retaining the character-defining characteristics of the building and site, rather than being divided in two and expanded vertically, as proposed by the developer. These factors plus the size of the site provide latitude to achieve the same amount of housing units as the Proposed 744-unit Project. In the Proposed Project, the Laurel duplexes would be two stories higher than the homes across Laurel Street, but the new Plaza A and Plaza B building zoning changes would extend existing height limits by only five feet. The heights of the Plaza A and Plaza B buildings along California Street could be increased by more than 5 feet without having a greater impact upon neighborhood compatibility than the Project's Laurel duplexes would have on the homes across Laurel Street.

Also, the California Historical Building Code provides flexibility with respect to any compliance issues, as it requires agencies to accept solutions to code compliance issues that are reasonably equivalent to regular code when dealing with qualified historical properties such as 3333 California Street. (Title 24 Cal. Code Regs. Part 8, section 8-102.1)

DESCRIPTION OF CHARACTER-DEFINING FEATURES OF HISTORIC RESOURCE

The Fireman's Fund Insurance Company Home Office is a 10.2-acre property in a predominantly residential area of San Francisco called Laurel Heights. From the property there are views in various directions to distant parts of San Francisco. The property consists of two buildings and a landscape that were designed to function as a single entity. The entity is the historic resource. And while it should be viewed as one entity, it is true that some portions of the resource are less important than others, such as the service building, parking lots and circular garage ramps.

The main building, referred to in the nomination as the Office Building, is a large three- to seven-story building located in the center of the property. (Ex. C, Nomination, section 7, pp. 4-5) The Office Building is a glass curtain-walled structure with an open character. The Office Building is an International Style building which despite its size is built into its sloping hillside site in such a way as to minimize its presence. Its four wings, each built for different functions, range from three floors to seven floors. It is characterized by its horizontality, its bands of windows separated by the thin edges of projecting concrete floors, and brick trim. The wings of the building frame outdoor spaces whose landscape design connects the outdoors with the indoors both functionally and conceptually. The landscape design includes outdoor spaces for use by employees, parking lots, circulation paths, and vegetation. (Ex. C, section 7, Nomination p. 5) The Proposed Project would eliminate the essential and most important character-defining features that largely make up the importance of the historic entity.

The landscape was an integral part of the original design for the new corporate headquarters commissioned by Fireman's Fund in the mid-1950s. The San Francisco-based firm of Eckbo, Royston, and Williams (ERW) was the landscape architect for the original landscape design, completed in 1957, and its successor firm Eckbo, Dean, Austin, and Williams (EDAW) designed the landscape associated with the mid-1960s additions. The landscape setting around the modernist Office Building integrates functional needs (such as parking lots and internal circulation) with large areas of lawns and structured outdoor spaces (the Terrace, Entrance Court, and the Auditorium's outdoor spaces). The landscape is designed to promote the integration

between architecture and landscape and uses forms and materials that are characteristic of modernist designs from the mid-twentieth century. (Ex. C, section 7, Nomination pp. 7-11)

A brick wall, which takes different forms, provides a continuous and unifying element around the edges of the site. It exists as a retaining wall along the perimeter of the property's northeast, north, and west sides. On the south side of the Executive/Visitor Gate, the perimeter wall is transformed into low retaining walls that define a series of planting beds along the west end and south side of the Executive Wing. The wall continues along the outer edge of the Terrace garden, along the bank that parallels Masonic Avenue, and then reconnects to the southeast corner of the Office Wing (east). Here rectangular brick planting beds have been incorporated into the wall, creating a zig-zag alignment similar to that found in other locations (i.e., on the bank along Laurel Street in the vicinity of the Entrance Court, on the southwest side of the Terrace, and in the bench wall that frames the eastern side of the Terrace). (Ex. C, Nomination, section 7, p. 11)

Lawns create the setting for the Office Building along the west and south sides of the property (and create a compatible connection between the property and the surrounding residential neighborhood) and slope downward toward California and Masonic Streets, respectively. (Ex. C, Nomination, section 7, p. 12)

Some of the large trees which were part of the Laurel Hill cemetery vegetation were saved and ERW incorporated these into planting islands in the East and West Parking Lots in their mid-1950s design. Two Monterey cypress trees on a low mound in the East Parking Lot and a blue gum eucalyptus and several Monterey cypress in the West Parking Lot are remnants of this design feature. Monterey cypress, which were planted at some point after the addition of the Garage in the mid-1960s, occupy the land between the East Parking Lot and California Street. These trees, and the brick perimeter wall, buffer views of the parking lots from the street and lessen the apparent size of the Office Building. (Ex. C, Nomination, section 7, p. 12)

Landscaped banks along the west and southeast sides of the site provide a transition between different elevations of the land within the property and the surrounding streets. The presence of these landscaped banks (planted mainly with grass, some larger shrubs, and several trees) help to reduce the need for tall retaining walls and also increase the amount of green space around the edges of the property. (Ex. C, Nomination, section 7, p. 12)

The Entrance Court on the west side of the Office Building—in the outdoor space between the Office, Cafeteria, and Executive Wings—provides parking and access to the building's Executive/Visitor Entrance and was one of the two structured outdoor spaces in ERW's mid-1950s design. A narrow, rectangular planting bed (10' x 55') at the center of the asphalt paving creates a U-shaped drive. (Ex. C, Nomination, section 7, p. 13)

In ERW's mid-1950s design, the principal structured outdoor space was the Terrace, which was intended as a place for employees to sit outside during lunch and at breaks. The plan for the Terrace provides a classic modernist composition. The biomorphic-shaped lawn contrasts with the rectilinear pattern of the pavement and the geometric form of the three, circular tree beds, the zig-zag alignment of the wall along its eastern edge, and the curved arch of hedge in the raised planting bed along its eastern edge. The triangular relationship between the three circular tree beds adds yet another level to the geometry of the composition. (Ex. C, Nomination, section 7, p. 13) The Proposed Project would entirely eliminate this key character-defining feature and

substitute it with a walkway which would be shaded during virtually the entirety of the day and act as a wind tunnel to pedestrians. Such a miserable substitute comes nowhere close to the current configuration and mature landscaping of the Terrace.

The landscape along the east side of the property—which is at the same grade as Presidio Avenue—consists of a row of redwood trees planted across the eastern façade of the building, a level lawn between the building and street, and the Presidio Avenue Service Drive which provides access to sub-level three of the Garage. (Ex. C, Nomination, section 7, p. 14)

Among the **CHARACTER DEFINING FEATURES** identified in the Nomination are the following:

Office Building

- Plan of the building with wings open along the sides to the immediate landscape and to views of the distant city
- Horizontality of massing
- Horizontal lines of projecting edges of concrete floors
- Horizontal bands of nearly identical window units
- Uninterrupted glass walls
- Window units of aluminum and glass
- Wrought iron deck railings that match gates in the landscape
- Brick accents and trim

Landscape

- Terrace, as the "centerpiece" of the landscape, designed to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco); key character-defining features include its biomorphic-shaped lawn surrounded by a paved terrace and patio (paved with exposed aggregate concrete divided into panels by rows of brick); brick retaining wall and large planting bed around the east and north sides of the paved patio, custom-designed wood benches, and three circular tree beds constructed of modular sections of concrete.
- Entrance Court, providing a connection between the Executive/Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria Wing; key character-defining features include a central paved parking lot surrounded on its north, east, and west sides by narrow planting beds; exposed

aggregate sidewalks along the north, east, and west sides of the parking lot; and a low free-standing brick wall along its north side.

- Brick wall (constructed of red brick set in running bond pattern similar in appearance to brick used in exterior of main building) that takes several forms and which forms a continuous and unifying element around the edges of the site.

- Three gated entrances—one for the employees on California Street and the service and executive/visitor entrances on Laurel Street—that are integrated into the brick perimeter wall.

- Internal Circulation System (entrance drive, service drive, East and West Parking lots)

- Vegetation features that help to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods including (1) the large trees in and around the East and West Parking Lots, (2) the lawns on the west, south, and east sides of the property, and (3) the planted banks along Laurel and Masonic streets. (Ex. C, Nomination, section 7, pp. 18-20)

The Fireman's Fund Home Office is also significant in the area of Commerce for its association with the San Francisco insurance industry, an important industry in the history of the city from the Gold Rush to the present. It represents the postwar boom in San Francisco's insurance industry when Fireman's Fund was one of the largest insurance companies in the United States. It was the only major insurance company headquartered in San Francisco. It was a leader among all insurance companies in San Francisco in its embrace of new ideas, symbolized by its move away from downtown to an outlying location. (Ex. C, Nomination, section 8, p. 23)

Under Criterion A, the Fireman's Fund Home Office is significant in the area of Community Planning and Development as one of the principal embodiments of the postwar decentralization and suburbanization of San Francisco. Fireman's Fund was the first major office building to be built outside of downtown in a suburban setting. (Ex. C., Nomination, section 8, p. 23)

Under Criterion C, the Fireman's Fund Home Office is significant as the work of three masters, the architect Edward B. Page, the engineering firm of John J. Gould & H.J. Degenkolb/Henry J. Degenkolb & Associates, and the landscape architectural firm of Eckbo, Royston, & Williams (ERW)/Eckbo, Austin, Dean, and Williams (EDAW). As a modernist, through his experiences in Paris in 1930, Edward Page had direct links to the birth of modern architecture and to its development in the United States. The Fireman's Fund Home Office is his best known and most important work. The Fireman's Fund Home Office—with its innovative structural design that provided open floors with minimal columns and exterior walls of glass—represents the beginning of the reputation of the Gould and Degenkolb engineering firms as among the leading structural engineers in San Francisco in the post-World War II period. (Ex. C, Nomination, section 8, p. 23)

ERW/EDAW was recognized as one of the country's leading landscape architectural firms during the period of significance, and their designs and writings contributed to the popularization of the modernist landscape design vocabulary and to modernism as an approach to creating outdoor spaces that addressed contemporary needs within a broad range of settings. The Fireman's Fund Home Office represents an example of the firm's mastery of modern design within a corporate landscape context. Additionally, the Fireman's Fund Insurance Company Home Office, a single property including both architectural and landscape architectural elements which were designed to complement each other, is significant under Criterion C as an example of a corporate headquarters in San Francisco that reflects mid-twentieth-century modernist design principles. (Ex. C, Nomination, section 8, p. 23)

The Fireman's Fund Home Office was the subject of wide popular and professional press coverage when it was first completed. In addition to numerous articles in the San Francisco press, *Business Week* ran an article on the company to coincide with the completion of the building. The most complete San Francisco newspaper article was *San Francisco Chronicle*, "Fireman's Fund Shows New Home," 9 July 1957; *Business Week*, "Casualty Insurer Faces the Music: Fireman's Fund, hardest hit by disasters of 1956, is pushing a comeback program that others may have to copy," 27 July 1957, pp. 92-98. (Ex. C, Nomination, section 8, pp. 29, 32)

The prominent French journal, *Architecture d'aujourd hui*, devoted two pages to the architecture and landscape design of the property in a special issue on office buildings around the world. Fireman's Fund was the only American building featured among forty-three buildings in sixteen countries on three continents. V. Janson de Fischer, "Le Siege d'une Compagnie d'assurance, a San Francisco," *Architecture d'aujourd'hui* 30, No. 82 (January 1959), 82-83. (*Ibid.* and Ex. D)

Garrett Eckbo included a description, site plan, and nine photographs of Fireman's Fund as one of the five projects he used to illustrate the "Building and Site" chapter of his book *Urban Landscape Design*. (Ex. E and Ex. C, Nomination, section 8, pp. 29, 32) Eckbo explained the theory behind this modernistic design:

> The single building on a site larger than its ground floor area has been the typical concentration of modern architecture and landscape thinking...the landscape design problem is to achieve the best possible development of a space or series of spaces determined by the relationship between the building and the site boundaries...yard spaces which do not relate to building or specific function must be developed in meaningful forms. All of this will be more difficult if the building has been conceived as a self-sufficient unit, and less difficult if the organization of building and site spaces is conceived as one coherent pattern at one time. (Ex. E, p. 45)

The April 1956 edition of *Architect and Engineer* , noted that "[t]he horizontal country-type structure will be unique among the typically vertical office buildings in San Francisco to conform to the lines of the surrounding area, which is predominantly residential;" the structure, which will overlook San Francisco, has been designed to relate to its park-like setting." (Ex. F, p. 12) An extensive article on the new headquarters, in the *Architect and Engineer* in September 1957, explained that "The building itself occupies 1.74 acres, and there are 2.75 acres of off-street parking for more than 250 cars. On the rest of the land area, a truly superb job of

landscaping has been done. This includes 110 varieties of trees, plants and ground cover that give the area surrounding the building a park-like aspect." (Ex. G, p. 17)

ANALYSIS OF USE OF SECRETARY'S STANDARDS AS MITIGATION FOR SIGNIFICANT IMPACTS ON VARIOUS CHARACTER-DEFINING FEATURES

The Secretary's Standards are listed below. (See also, DEIR 4.B.32) The Standards are shown in *italics*, the Secretary's RECOMMENDED Guidelines are highlighted in **bold** print, and actions NOT RECOMMENDED by the Secretary are stated in *underlined italics,* with analysis of how the Secretary's Standard or recommended Guideline can be used to mitigate adverse impacts which the Proposed Project would cause to various character-defining features of the resource.

Standard #1 is discussed at pages 11-19, Standard #2 at page19, Standard #4 at page 20, Standard #5 at pages 20, Standard #6 at page 21, Standard #9 at pages 21, and Standard #10 at pages 21-22.

Standard #1

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 accompanying Secretary's design Guidelines seek to avoid negative impacts to a historic building, its site and setting and recommend:

> ***Identifying, retaining, and preserving*** **features of the building site that are important in defining its overall historic character. Site features may include walls, fences, or steps; circulation systems, such as walks, paths or roads; vegetation, such as trees, shrubs, grass, orchards, hedges, windbreaks, or gardens; landforms, such as hills terracing, or berms; furnishings and fixtures, such as light posts or benches,; decorative elements, such as sculpture, statuary, or monuments; water features, including fountains, streams, pools, lakes, or irrigation ditches; and subsurface archeological resources, other cultural or religious features, or burial grounds which are also important to the site.** (Ex. A, p. 137)

The Secretary's Guidelines do not recommend:

> *NOT RECOMMENDED: Removing or substantially changing buildings and their features or site features which are important in defining the overall historic character of the property so that, as a result, the character is diminished.* (Ex. A. p. 137)

The Guidelines further recommend:

> **Retaining the historic relationship between buildings and the landscape…Minimizing disturbance of the terrain around buildings or elsewhere on**

the site, thereby reducing the possibility of destroying or damaging important landscape features, archeological resources, other cultural or religious features, or burial grounds. (Ex. A, p. 138)

Identifying, retaining, and preserving **building and landscape features that are important in defining the overall historic character of the setting. Such features can include circulation systems, such as roads and streets; furnishings and fixtures, such as light posts or benches; vegetation, gardens and yards; adjacent open space, such as fields, parks, commons, or woodlands; and important views or visual relationships.** (Ex. A, p. 143)

The Secretary's Guidelines do not recommend:

NOT RECOMMENDED: Removing or relocating buildings or landscape features, thereby destroying the historic relationship between buildings and the landscape.

Changing the grade level of the site if it diminishes its historic character. For example, lowering the grade adjacent to a building to maximize use of a basement, which would change the historic appearance of the building and its relation to the site. (Ex. A, p. 138)

Using heavy machinery or equipment in areas where it may disturb or damage important landscape features, archeological resources, other cultural or religious features, or burial grounds. (Ex. A, p. 138)

Removing or substantially changing those building and landscape features in the setting which are important in defining the historic character so that, as a result, the character is diminished. (Ex. A., p. 143)

Focusing new development with increased heights along California Street would allow the character-defining features of the resource located in the southern portion of the site to remain free of development. Such mitigation is exactly what the experts at the Architectural Review Committee of the San Francisco Historic Preservation Commission suggested when reviewing a "set of alternatives" prepared by the City, as follows:

> Additional height on new buildings along California Street could be added without a substantial effect on the character-defining features of the site because these features are not as discernible from vantage points along California Street. DEIR 6.7.

In reviewing the alternatives presented to them by Planning Department staff, the Architectural Review Committee recommended revisions to the alternatives including the following:

- Limit changes to the existing building (including additions) but explore conversion of office use to residential use to better meet one of the basic project objectives.

- Preserve character-defining site and landscape features that provide the site with its historically open corporate campus feel with greater development focus on the northern portion of the site to allow the southern portion of the site to remain free of development.

- Balance the retention of the character-defining features of the building and those of the site and designed landscape with emphasis on the retention of views of the southern portion of the site to better convey the integral relationship between the character-defining features of the building, the site, and the designated landscape.

- Preserve views of the site that best exemplify the integration of the character-defining features of the existing building and those of the site and designed landscape such as the building's stepped, multi-story massing and the curvilinear shapes in pathways, driveways, and planting areas; and other integrated landscape features such as the southeast courtyard, retaining wall and mature trees in dense landscaping evident from the south (Masonic and Euclid avenues) and east (Pine Street/Presidio Avenue); and

- Establish land use programs that focus development on limited portions of the site, but at greater intensities (e.g., additional height), particularly on the northern portion of the site along California Street, in order to incorporate more residential units. (DEIR 6.8)

These comments are evidence of the feasibility of using similar Secretary's design Guidelines discussed above which focus on minimal change to the defining characteristics of the building and site, preserving site features that are important in defining its overall character and minimizing disturbance of the terrain around buildings. Had the City presented the Secretary's design Guidelines as mitigation measures, the decisionmakers and members of the public could have applied the Guidelines to sculpt a development that achieved basic project objectives while preserving the defining characteristics of the resource. However, the EIR failed to provide the mitigation options to the decisionmaker, and the City found the alternative site plans described in the Draft EIR infeasible.

Applying the Secretary's Guidelines, I have marked with cross-hatching areas where proposed new residential construction in the Proposed Project can be removed from the southern portion of the site in order to mitigate impacts on character-defining features of the historically significant landscape. (Ex. H) This new residential development can be constructed inside the existing southern wing of the main building or the transferred to the northern portion of the site along California Street. These design changes would avoid adverse impacts on the historic green space which commands valued public views of the City and/or on the character-defining Terrace, which could be used as privately-owned, publicly accessible open space in a modified project. Views of the City and Golden Gate Bridge as seen from the historic green space and Terrace are shown in the attached photographs. (Ex. I)

The developer's renderings depict the manner in which views of the city would be impaired by new street trees proposed to be placed around the perimeter of this green space in the Proposed

Project. (Ex. Q) Removing new street trees from locations where they would impair these public vistas would substantially mitigate the Project's impairment of important landscape features of the site. Under Public Works Code section 806(d)(4)(B), the Director of Public Works may waive one or more required Street Trees by requiring the applicant to either "fulfill all or a portion of the requirement by providing alternative landscaping, including but not limited to sidewalk landscaping, in an amount comparable to or greater than the number of Street Trees waived" or by paying an In-lieu fee pursuant to Section 802.

Mitigation that conforms with the Secretary's Standards would also avoid excavating significant portions of the natural green areas along the slope of Laurel Hill and avoid destroying important landscape features. (Ex. J, 7-03-2019 plan sheet G2.08)

The EIR acknowledged that mitigation which focused on the southern and eastern portions of the site would preserve fine examples of the integration of the character-defining features of the property:

> "The southern and eastern portions of the site, where the existing building's stepped, multi-story massing is integrated with the site's topography, open spaces with private courtyards, terraced landscaping, and mature trees, and the green lawn extending east along Euclid Avenue present the best example of the integration of the character-defining features of the property." DEIR 6.80.

In addition, under mitigation which avoided destroying important landscape features, two very large Cypress trees that are survivors of the Laurel Hill Cemetery would be preserved in the Market Plaza. (7-03-2019 plan sheet L2.01)

In addition, the Secretary's Guidelines specifically recommend limiting any Rooftop Addition for a multi-story building to one story in height to minimize its visibility and its impact on the historic character of the resource, as follows:

> **Limiting a rooftop addition to one story in height to minimize its visibility and its impact on the historic character of the building.** (Ex. A, p. 160)
>
> **Designing a compatible rooftop addition for a multi-story building, when required for a new use, that is set back at least one full bay from the primary and other highly-visible elevations and that is inconspicuous when viewed from surrounding streets.** (Ex. A, p. 159)
>
> **Designing rooftop additions, elevator or stair towers, decks or terraces, dormers, or skylights when required by a new or continuing use so that they are inconspicuous and minimally visible on the site and from the public right-of-way and do not damage or obscure character-defining historic features.** (Ex. A, p. 101)

The Secretary's Guidelines do not recommend:

NOT RECOMMENDED:Constructing a highly-visible, multi-story rooftop addition that alters the building's historic character. (Ex. A, p. 160)

Constructing a rooftop addition with amenities (such as a raised pool deck with plantings, HVAC equipment, or screening) that is highly visible and negatively impacts the historic character of the building. (Ex. A, p. 160)

Constructing a rooftop addition that is highly visible, which negatively impacts the character of the historic building, its site, setting, or district. (Ex. A, p. 159)

Using the Guidelines stated above, a one-story, set-back addition could feasibly be constructed on the main building instead of a two to three-story addition constructed on a divided building, as proposed in the Project.

The EIR acknowledged that a one-story rooftop addition would not have a significant impact on a defining characteristic of the resource:

> A one-story rooftop addition set back 15 feet from the east, west and south facades of the office building , with a contemporary design that would distinguish it from the original building, would not result in a substantial change to the massing of the original building and would be compatible with the original building. (DEIR 6.39-6.41 for Alternative B, DEIR 6.77 for Alternative C) The rooftop addition would have a contemporary design which would distinguish it from the original building, while steel and glazing materials would make it compatible with the original building. (DEIR 6.78)

In fact, Alternative C in the DEIR, the Full Preservation Residential Alternative Site Plan, proposed a 1 story addition to the main building but did not focus increased heights in all the new buildings along California Street. (Ex. K; DEIR 6.67) In Alternative C, the Plaza A and Plaza B Buildings would be only 45 feet tall and the Walnut Building 67 feet tall. *Ibid.* However, Plaza A and Plaza B Buildings could have been made 65 feet tall, as they were in Alternative D: Partial Preservation Office Alternative Site Plan. (Ex. K; DEIR 6.102.)

Alternative C would have 210 fewer units than the project Variant and 44,306 gsf of ground-floor retail space and was found to have inadequate numbers of housing units. Alternative C was unreasonably configured to have insufficient housing even though it would preserve the majority of the character-defining features of the main building and landscaping, and the one-story rooftop addition would not result in a substantial change to the building's massing. (DEIR 6.78) Further, Alternative C "would provide a high quality and varied architectural and landscape design, utilizing the site's topography and other unique characteristics." (DEIR 6.75)

Had the Secretary's Guidelines been applied to focus increased heights at the Plaza A and Plaza B Buildings, some or all of the 44,306 gsf of retail spaces converted to housing units and the Walnut Building be made as tall as needed to accommodate additional housing units, the Project's 744 housing unit objective could have been achieved in Alternative C. However,

Alternative C was not designed to achieve a number of housing units substantially similar to 744 units. The EIR evidenced awareness of the inadequacy of the range of alternatives selected and indicated that they were designed to address the significant impact on transit rather than the significant impact on the historical resource:

> Most of the selected alternatives represent some degree of reduced development compared to the proposed project or project variant....The proposed alternatives with "reduced development" programs, depending on the mix of uses and related demand on transit, may result in the reduction in the severity of the transit impact. DEIR 6.9.

It should also be noted that the DEIR inaccurately stated that pedestrians would not be able to travel through the site to, or access the site from, Masonic and Euclid Avenues. (DEIR 6.73) As explained herein, there is an existing north/south pathway that extends from the north side of the main building through to the Eckbo Terrace on the south side, and hence onto a pathway that opens onto Masonic Avenue. While currently used by staff, the pathway could be opened to the public and security doors or walls installed to prevent access to residential areas.

The EIR also acknowledged that the main building could be converted to residential use without dividing it in two:

> The planning department acknowledged in the staff report to the ARC that the alternatives could adaptively reuse the existing building for residential use with differences limited to exterior alterations to the glass curtain wall system and other limited code-related changes necessary for residential use. DEIR 6.7.

Had the design Guidelines be provided to the decisionmakers, they would have had State-sanctioned tools to focus increased heights along the northern portion of the property, construct a one-story rooftop addition on the main building, and preserve the defining characteristics of the landscape on the southeastern (Masonic), southern (Euclid), eastern (Presidio) and some or all of the western portion (Laurel) of the site. However, the decisionmaker was not told of the historic design Guidelines that it could use as mitigation.

The EIR also did not inform the decisionmakers that they could use the following Secretary's guideline, which recommends designing new additions to avoid damage to character-defining features of a historic site, as follows:

> **New additions should be designed and constructed so that the character-defining features of the historic building, its site, and setting are not negatively impacted.** (Ex. A. p. 79)

To avoid impairing the defining horizontality of the main building, a one to two story internal portal can be constructed through the building with a light court above, rather than a 40-foot wide division all the way through the building, as proposed by the developer. The areas colored solid red on Exhibit H depict the approximate area of this internal pathway with light court above. City staff only requested a north/south connection that could meander through the site, did not need to be a straight axial pathway, and could be a portal through the building. (Ex. L

hereto and Ex. FF to September 5, 2019 LHIA submittal to Planning Commission.) Thus, a design modification could provide a new pathway while preserving the defining horizontality of the main building. This pathway could be sloped to accommodate grade and would not need to incorporate a stairway.

Alternatively, the existing north/south passageway through the main building that leads from the Conference Center entrance to the Eckbo Terrace could be opened to the public and marked with signage. (Ex. L, statement of Devincenzi, photographs and UC description of existing pathway). Using the existing internal pathway, a visitor can take an elevator to the floor above and exit on the upper portion of the Eckbo Terrace, which is level, and thence travel out the gates to Masonic Avenue. A visitor can also travel straight through the existing internal pathway and exit on the lower portion of the Eckbo Terrace, where a sloped pathway leads up to the upper level of the Eckbo Terrace, and thence out to Masonic Avenue. (Ex. L) The gate that leads to Masonic Avenue is open during business hours. (Ex. L)

Other Guidelines could have been used as mitigation to focus the location of new buildings to avoid negative impacts to historic characteristics, as follows:

> **Locating new construction far enough away from the historic building, when possible, where it will be minimally visible and will not negatively affect the building's character, the site, or setting.** (Ex. A. p. 161)
>
> **Using site features or land formations, such as trees or sloping terrain, to help minimize the new construction and its impact on the historic building and property.** (Ex. A. p. 162)
>
> **Retaining a historic entrance or porch even though it will no longer be used because of a change in the building's function.** (Ex. A, p. 110)

The Secretary's Guidelines do not recommend:

> *NOT RECOMMENDED: Placing new construction too close to the historic building so that it negatively impacts the building's character, the site, or setting.* (Ex. A, p. 161)
>
> *Removing a historic entrance or porch that will no longer be required for the building's new use.* (Ex. A, p. 110)

The availability of large areas along California Street currently used for parking lots, where height limits can be increased, provides a feasible opportunity to locate new construction far enough away from the historic building so that it will not negatively affect the building's character, site or settings. Also, to provide space for additional residential units, the Mayfair Building could be constructed in the area proposed in the developer's plans.

In addition, if the Proposed Project's design was changed to avoid removing the southern wing of the main building, and instead converting that portion of the building to residential use, the revised project could avoid adversely impacting the character-defining feature of the "[p]lan of

the building with wings open along the sides to the immediate landscape and to views of the distant city" and key character-defining features of the Entrance Court. (Ex. C, Nomination, section 7, pp. 18-19) TreanorHL confirmed that the southern wing can be converted to residential use after reviewing the existing building drawings for 3333 California Street on file at the records department of the San Francisco Building Department. (Ex. M, TreanorHL's August 20, 2019 Preservation Alternative – Feasibility Evaluations; Ex. N, existing building plans) Scale of the existing building is provided in an excerpt from the 1989 EIR for UCSF-Laurel Heights. (Ex. O, p. 35) Retaining the southern wing of the main building would also conform with the Guideline that recommends retaining a historic entrance even though it will no longer be used because of a change in the building's function.

The following Guidelines relate to repair or replacement of deterioration in the curtain wall systems in the main building:

> ***Identifying, retaining, and preserving*** **curtain wall systems and their components (metal framing members and glass or opaque panels) that are important in defining the overall historic character of the building. The design of the curtain wall is significant, as are its component materials (metal stick framing and panel materials, such as clear or spandrel glass, stone, terra cotta, metal, and fiber-reinforced plastic), appearance (e.g., glazing color or tint, transparency, and reflectivity), and whether the glazing is fixed, operable or louvered glass panels.** (Ex. A., p. 117)
>
> ***Replacing*** **in kind a component or components of a curtain wall system that are too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature. If using the same kind of material is not feasible, then a compatible substitute material may be considered as long as it has the same finish and appearance.** (Ex. A, p. 118)
>
> **Installing new glazing or an entire new curtain wall system, when necessary to meet safety-code requirements, with dimensions, detailing, materials, colors, and finish as close as possible to the historic curtain wall components.** (Ex. A, p. 120)
>
> **Replacing windows that are too deteriorated to repair using the same sash and pane configuration, but with new windows that operate differently, if necessary, to accommodate a new use. Any change must have minimal visual impact.** (Ex. A, p. 109)

The Secretary's Guidelines do not recommend:

> *NOT RECOMMENDED: Removing or substantially changing curtain wall components which are important in defining the overall historic character of the building so that, as a result, the character is diminished.* (Ex. A, p. 117)
>
> *Replacing historic curtain wall features instead of repairing or replacing only the deteriorated components.* (Ex. A, p. 117)

Removing a curtain wall component or the entire system, if necessary, that is unrepairable and not replacing it or replacing it with a new component or system that does not convey the same appearance. (Ex. A, p. 118)

Installing new glazing or an entire new curtain wall system, when necessary to meet safety-code requirements, with dimensions and detailing that is significantly different from the historic curtain wall components. (Ex. A, p. 120)

Replacing a window that contributes to the historic character of the building with a new window that is different in design (such as glass divisions or muntin profiles), dimensions, materials (wood, metal, or glass), finish or color, or location that will have a noticeably different appearance from the historic windows, which may negatively impact the character of the building. (Ex. A, p. 109)

The project proponent can comply with these Guidelines if it either repairs deterioration in the curtain wall or replaces deteriorated windows with compatible substitute materials, using the same sash and pane configuration, but with new windows that operate differently, if necessary, to accommodate residential use. Replacement windows that comply with these Guidelines can feasibly be designed and obtained. It is unclear whether the Project would comply with these Guidelines because the August 17, 2017 plan sheet A6.01 indicates that articulated Bay Windows would modulate the horizontality of the main building. (Ex. P)

Standard #2

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.

Using the design mitigation described above, impacts of the Proposed Project on the historic resource can be substantially reduced by focusing much of the new construction at the parking lots along California Street, which are not considered character-defining, and designing the project to retain the Eckbo Terrace and the natural green spaces along Laurel Street, Euclid Avenue and Presidio Avenue. The Mayfair building proposed by the developer could also be constructed. A one-story rooftop addition to the main building could be constructed with a new one to two-level internal pathway through the building, with lightwells above, rather than cutting the building in two. Also, as stated above, the southern wing of the main building can feasibly be converted to residential use instead of being demolished. And, the two Laurel duplexes proposed to be constructed at the top of Laurel Hill (near Euclid) could be removed to avoid encroaching on the historically significant green spaces that exist along Laurel Street and Euclid Avenue and command views of the City. (Ex. H)

In addition, the 2016 California Historical Building Code (CHBC), Title 24 Cal. Code Regs. Part 8, section 8-102.1, can be used to address any compliance issues and is applicable to all issues regarding code compliance for qualified historical buildings or properties. The CHBC is intended to provide solutions for the preservation of qualified historical buildings or properties, to promote sustainability, to provide access for persons with disabilities and to provide a cost-effective approach to preservation. (24 Cal. Code Regs. Section 8-101.2) The CHBC requires

enforcing agencies to accept solutions that are reasonably equivalent to the regular code when dealing with qualified historical buildings or properties. (24 Cal. Code Regs. Section 8-101.2)

Thus, the Secretary's Guidelines set forth above and the CHBC could be used to provide feasible mitigation which would substantially reduce adverse impacts on character-defining features of the resource.

Standard #4

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

The main building was designed to accommodate future expansion, which took place from 1963 to 1967, in three phases, and increased the height of the southern wing and added a north-eastern wing to the building. (Ex. C, Nomination, section 8, pp. 29-31) The wings are now over 50 years old, and are considered part of the historic resource even if they were not part of the original construction. (Ex. R, Secretary of the Interior's Standards Compliancy Evaluation, Treanor HL, October 2, 2019, p. 9) As explained in TreanorHL's August 20, 2019 analysis, the southern wing can be converted to residential units instead of demolishing it. (Ex. M, p. 2) Thus, the goals of Standard 4 can be achieved by application of the Guidelines which recommend preserving changes that have acquired historic significance.

Standard #5

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

Changing the design to avoid significant changes to the design of the curtain walls, avoid dividing the main building into two pieces, and avoid adding two to three stories to divided portions of the main building, would retain the distinctive horizontality and design of the main building. As explained above, a one-story set-back addition could be added to the main building without materially impairing its horizontality. Additional square footage can feasibly be added to the Walnut Building and other buildings along California Street instead of raising the height of the main building beyond one story. The Project proposes to increase the height of the divided portions of the main building to 80 and 92 feet. (Ex. P, 7-3-19 plan sheet A6.21) The Project also proposes to increase height limits for new buildings along California Street. Thus, design modifications using the Secretary's Guidelines would comply with Standard 5 and provide feasible mitigation for adverse impacts on the defining horizontality of massing, horizontal bands of nearly identical window units, and uninterrupted glass walls. (Ex. C, Nomination, section 7, pp. 18-19)

Standard #6

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.

As explained above in relation to use of the Secretary's design Guidelines, any features which are deteriorated should be repaired rather than replaced, and any features that are deteriorated beyond repair should be replaced in kind, or, if substitute materials must be used, then the substitute material should match the old in design, color, texture and any other visual qualities. If the Proposed Project is designed with the mitigation measures described above, it could feasibly avoid removing deteriorated character defining features of the resource and could comply with Standard 6. Other than with respect to the windows of the main building, which can be replaced with compatible systems if they cannot be repaired, there is no evidence that any portion of the historic resource (Office Building and Landscaping) is deteriorated beyond repair to leave the decisionmakers "documentation" as its only mitigation measure.

Standard #9

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.

As explained above, the Secretary's Standards recommend limiting any rooftop addition to a multi-story building to a one-story addition to minimize its visibility and its impact on the historic character of the resource. (Ex. A, excerpts, pp. 159-160) These Standards also recommend setting such a rooftop addition back at least one full bay from the primary and other highly-visible elevations so it is inconspicuous when viewed from surrounding streets. *Ibid.* The EIR acknowledged that a one-story set-back rooftop addition with a contemporary design that would distinguish it from the original building would not have a significant impact on a defining characteristic of the resource. (DEIR 6.39-6.41 for Alternative B, DEIR 6.77 for Alternative C)

It is feasible to design a one-story addition that would comply with this Standard and avoid cutting the main building in two; instead, an internal one to two-story portal could be constructed through the main building, with a light well above. This portal could be sloped to grade and would not need to incorporate a stairway.

Using Standard 9, the character-defining horizontality of the main building can be maintained and new construction focused primarily along California Street, where currently non-character-defining parking lots exist. Also, to achieve 744 new residential units, the Mayfair building could be constructed in the location proposed by the developer. The new structures can be designed to be compatible with the main building by utilizing brick, glass, and concrete as exterior materials (tying into the materials of the main building). Compliance with Standard 9 would substantially reduce the adverse impacts of the Proposed Project on the character-defining features of the resource.

Standard #10

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.*

Using the design modifications discussed herein, new buildings would be focused in the parking lots along California Street and at the Mayfair building location. The main building could retain its existing horizontality, and the curtain wall would be retained if feasible for residential use or replaced with a system that would be compatible with the historic character of the resource. The interior of the main building could be converted to residential use, with lightwells providing interior illumination, and a one-story set-back addition constructed on the rooftop. So, if the proposed new development is removed in the future, the property could easily be returned to its historic appearance.

Using the direction of Standard 10, it would be feasible to design a new one-story addition and adjacent or related new construction 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. Design changes could avoid building on as much of the landscaping as possible while achieving most of the basic objectives of the Proposed Project and could construct a new one-story rooftop addition, rather than cutting the main building in two and adding two to three stories to a divided building. Design changes could also avoid demolishing the southern wing of the main building.

CONCLUSION

The Secretary's Guidelines provide very detailed design standards that can feasibly be used to substantially reduce or avoid a number or all of the Proposed Project's significant adverse impacts on character-defining features of the historic building and site. In essence, by omitting a discussion of such mitigation measures, the Draft EIR failed to inform the decisionmakers and members of the public of State-sanctioned options that are available to substantially reduce one or more adverse effects that the Proposed Project would have on character-defining features of the resource. The absence of such information was prejudicial to the decisionmakers' ability to make a fully informed decision as to available options and to the public's ability to participate in the CEQA process and to advocate for mitigation measures and alternatives.

Since the EIR did not evaluate use of any of the Secretary's design Guidelines as measures to mitigate significant adverse effects of the Proposed Project, it can reasonably be assumed that the project proponent and/or City made a conscious decision to ignore the design Guidelines prescribed by CEQA for mitigation, not that it would be infeasible to apply one or more of them. In fact, when neighborhood leaders urged the developer to redesign the Project in accordance with the Secretary's Standards after the site had been listed on the California Register, the developer indicated that he did not like the main building and wanted to "forget the rules." (Ex. S, October 17, 2018 email from Devincenzi to Dan Safier) The Draft EIR only considered photographing and documenting the resource before the site would be altered and concluded that such documentation would be inadequate to reduce the impacts of the Proposed Project on the historic resource to an insignificant level. (Ex. B; DEIR 4.B.41-47)

My resume is attached as Exhibit T hereto.

Petree A. Powell, MCP, JD

ATTACHMENTS: Exhibits A – T

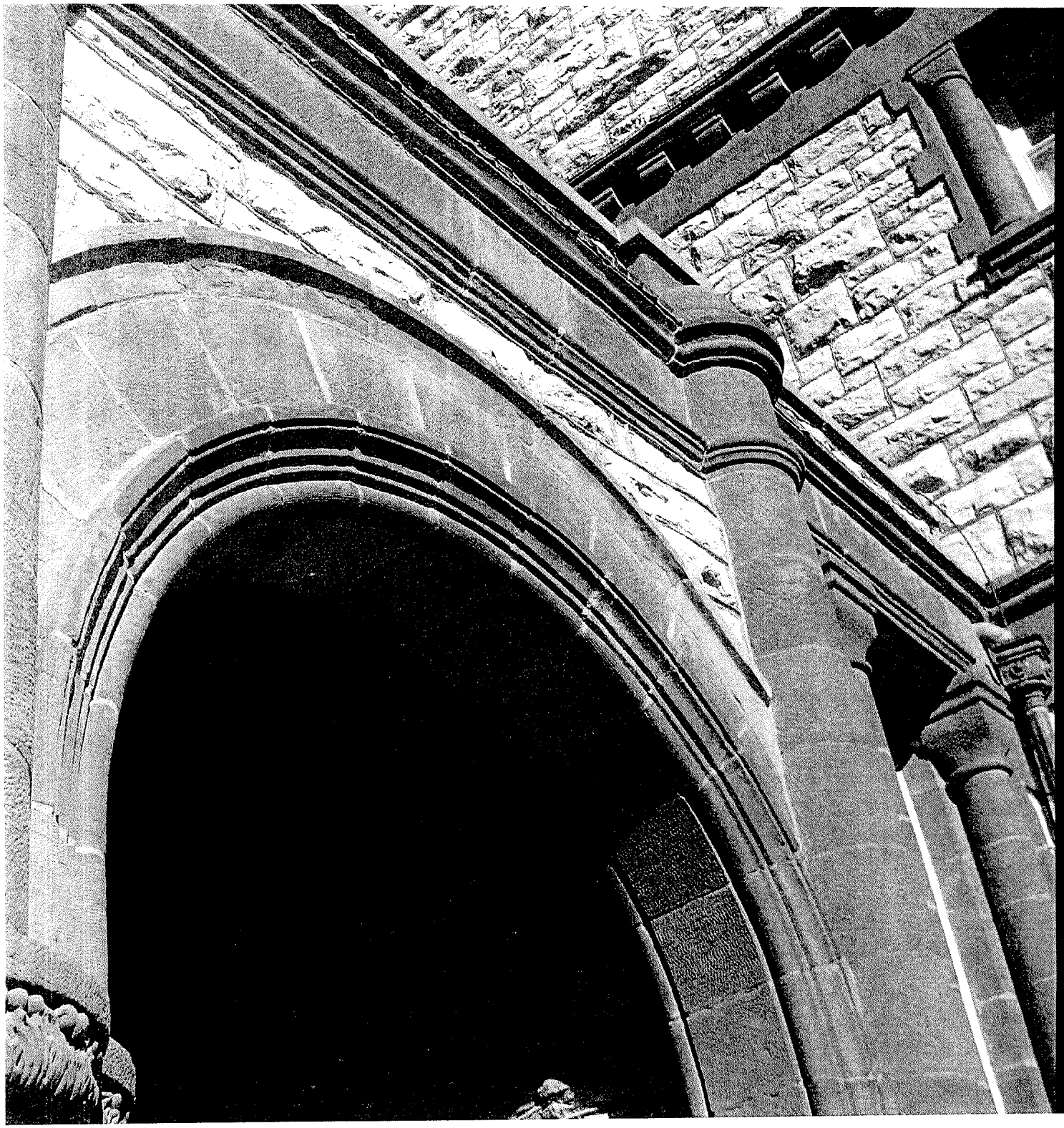
Re: 3333 California Street, San Francisco, CA
Record Number: 2015-014028ENV/CUA/PCA/MAP/DVA

Laurel Heights Improvement Association Appeal of Planning Commission's Certification of Final EIR/ CEQA Findings

Board of Supervisors File No: 191035

Exhibits to Statement of Petree A. Powell, MCP, JD

EXHIBIT A - Part 1



THE SECRETARY OF THE INTERIOR'S **STANDARDS** FOR THE TREATMENT OF HISTORIC PROPERTIES

WITH

GUIDELINES FOR PRESERVING, REHABILITATING, RESTORING & RECONSTRUCTING HISTORIC BUILDINGS

U.S. Department of the Interior
National Park Service
Technical Preservation Services

Under the National Historic Preservation Act (NHPA), the Secretary of the Interior is responsible for establishing professional standards and for providing guidance on the preservation of the nation's historic properties. *The Secretary of the Interior's Standards for the Treatment of Historic Properties* apply to all grants-in-aid projects assisted through the Historic Preservation Fund (authorized by the NHPA) and are intended to be applied to a wide variety of resource types, including buildings, sites, structures, objects, and districts. The Standards address four treatments: preservation, rehabilitation, restoration, and reconstruction. The treatment Standards, developed in 1992, were codified as 36 CFR Part 68 in the July 12, 1995, Federal Register (Vol. 60, No. 133). They replaced the 1978 and 1983 versions of 36 CFR Part 68, entitled *The Secretary of the Interior's Standards for Historic Preservation Projects.* The revised Guidelines herein replace the Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, published in 1995 to accompany the treatment Standards.

The Secretary of the Interior's Standards for the Treatment of Historic Properties are regulatory only for projects receiving Historic Preservation Fund grant assistance and other federally-assisted projects. Otherwise, these Guidelines are intended to provide general guidance for work on any historic building.

Another regulation, 36 CFR Part 67, focuses on "certified historic structures" as defined by the Internal Revenue Service Code of 1986. The Standards for Rehabilitation cited in 36 CFR Part 67 should always be used when property owners are seeking certification for federal tax benefits.

THE SECRETARY OF THE INTERIOR'S **STANDARDS** FOR THE TREATMENT OF HISTORIC PROPERTIES WITH **GUIDELINES** FOR PRESERVING, REHABILITATING, RESTORING & RECONSTRUCTING HISTORIC BUILDINGS

Revised by Anne E. Grimmer

from *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*
Kay D. Weeks and Anne E. Grimmer (1995)

U.S. Department of the Interior
National Park Service
Technical Preservation Services
Washington, D.C.

2017

CONTENTS

PREFACE

The year 2016 was significant as the Centennial of the National Park Service, which was established as a new bureau within the Department of the Interior by the Organic Act on August 25, 1916. As directed in this legislation, the National Park Service has served for one hundred years as steward of the "Federal areas known as national parks, monuments and reservations...to conserve the scenery and the natural and historic objects and the wild life therein and to...leave them unimpaired for the enjoyment of future generations."

The year 2016 also marked the 50th anniversary of the passage of the National Historic Preservation Act on October 15, 1966. The Act increased the scope and responsibilities of the National Park Service with regard to the preservation of cultural resources. The National Historic Preservation Act charges the National Park Service (through authority delegated by the Secretary of the Interior) to establish and administer a national historic preservation program and to develop and promulgate standards and guidelines for the treatment of historic properties.

The Secretary of the Interior's Standards for Historic Preservation Projects were first issued in 1978. In 1979 they were published with Guidelines for Applying the Standards and reprinted in 1985. The Standards were revised in 1992, when they were retitled *The Secretary of the Interior's Standards for the Treatment of Historic Properties.* The Standards were codified in the Federal Register in 1995, the same year that they were published with guidelines as *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings.* These Standards and Guidelines provide a critical part of the framework of the national preservation program. They are widely used at the federal, state, and local levels to guide work on historic buildings, and they also have been adopted by Certified Local Governments and historic preservation commissions across the nation.

In 2010 the National Park Service issued *A Call to Action: Preparing for a Second Century of Stewardship and Engagement*, a plan to chart a path for its next 100 years. This plan identified a number of actions with the goal to "preserve America's special places in the next century," which included updating National Park Service policies and guidance. The project to update *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* was undertaken as part of this broader effort.

Since these Guidelines were first published in 1995, a greater number of buildings and building types, telling a broader range of stories that are part of the nation's heritage, have been recognized as "historic"

and eligible for listing in the National Register of Historic Places. These guidelines have been updated and expanded to address the treatment of these buildings constructed with newer materials and systems from the mid- and late-20th century.

The updated Guidelines have the same organization as the prior version, beginning with an introduction and a historical overview, followed by chapters that focus on each of the four treatments: preservation, rehabilitation, restoration, and reconstruction. The historical overview has been expanded; not only has the information on historic materials, systems, features, and special issues that comprised the previous edition been more fully developed, but new entries have been added on glass, paint and other coatings, composite materials, imitative materials, and curtain walls.

In each of the four chapters, the "Recommended" and "Not Recommended" treatments have been updated and revised throughout to ensure that they continue to promote the best practices in preservation. The section on exterior additions to historic buildings in the Rehabilitation Guidelines has been broadened also to address related new construction on a building site. A section on code-required work is now included in all of the chapters. "Energy Efficiency" has been eliminated, since it is more fully covered by the guidance provided on sustainability in *The Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings* (published in 2011), which has general applicability to all the treatments and is incorporated here by reference. Sections on "Resilience to Natural Hazards" have been added, but these topics will be more fully addressed in separate documents and web features. Finally, the updated Guidelines feature all new, and many more, illustrations in color.

Herewith Technical Preservation Services issues the National Park Service Centennial edition of *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, updated and revised in recognition of the 50th anniversary of the National Historic Preservation Act, to ensure that the preservation guidance for historic buildings provided by the National Park Service continues to be meaningful and relevant in the 21st century.

Technical Preservation Services
National Park Service

INTRODUCTION

Using the Standards and Guidelines for Preservation, Rehabilitation, Restoration, and Reconstruction Projects

The Secretary of the Interior's Standards for the Treatment of Historic Properties address four treatments: preservation, rehabilitation, restoration, and reconstruction. As stated in the regulations (36 CFR Part 68) promulgating the Standards, "one set of standards ...will apply to a property undergoing treatment, depending upon the property's significance, existing physical condition, the extent of documentation available, and interpretive goals, when applicable. The Standards will be applied taking into consideration the economic and technical feasibility of each project." These Standards apply not only to historic buildings but also to a wide variety of historic resource types eligible to be listed in the National Register of Historic Places. This includes buildings, sites, structures, objects, and districts.

Guidelines, however, are developed to help apply the Standards to a specific type of historic resource. Thus, in addition to these Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, there are also guidelines for cultural landscapes, historic lighthouses, historic vessels, historic furnished interiors, and historic covered bridges.

The purpose of *The Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* is to provide guidance to historic building owners and building managers, preservation consultants, architects, contractors, and project reviewers prior to beginning work. It is always recommended that preservation professionals be consulted early in any project.

The Guidelines are intended as an aid to assist in applying the Standards to all types of historic buildings. They are not meant to give case-specific advice or address exceptions or unusual conditions. They address both exterior and interior work on historic buildings. Those approaches to work treatments and techniques that are consistent with The Secretary of the Interior's Standards for the Treatment of Historic Properties are listed in the "Recommended" column on the left; those which are inconsistent with the Standards are listed in the "Not Recommended" column on the right.

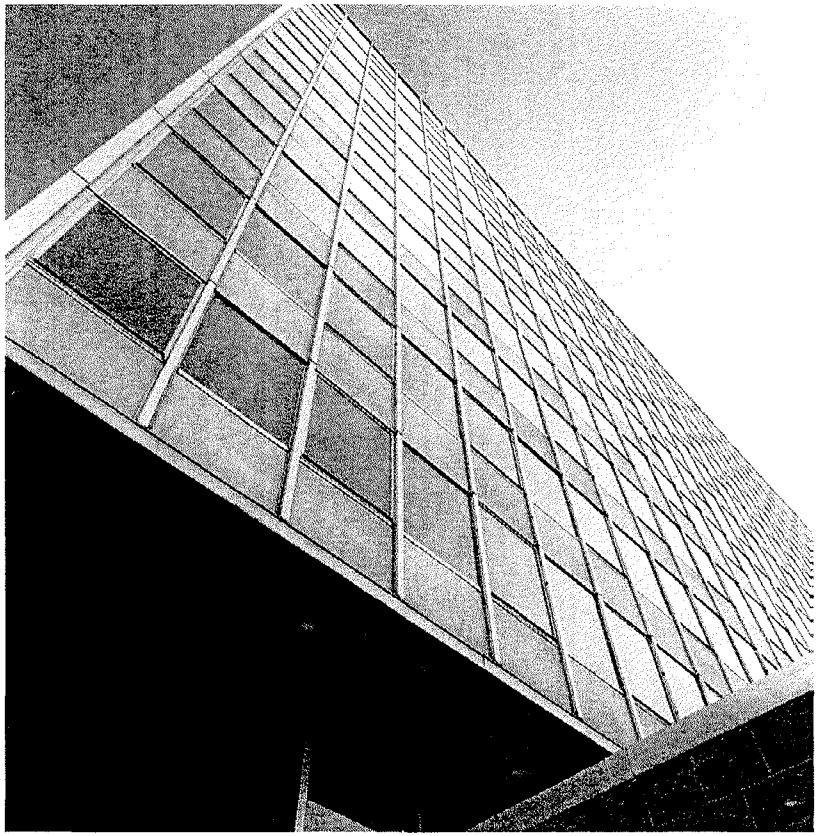
There are four sections, each focusing on one of the four treatment Standards: Preservation, Rehabilitation, Restoration, and Reconstruction. Each section includes one set of Standards with accompanying Guidelines that are to be used throughout the course of a project.

Preservation *is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project. However, new exterior additions are not within the scope of this treatment.* The Standards for Preservation require retention of the greatest amount of historic fabric along with the building's historic form.

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.* The Rehabilitation Standards acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building's historic character.

Curtain Walls

Curtain wall construction was originally based on a steel framework. Today, most curtain wall construction utilizes an extruded aluminum framework, which became popular in the 1930s in the U.S. and came into its own after World War II. A curtain wall is not a structural system and, although it is self supporting, does not carry the weight of the building. Rather, it is an exterior wall hung or attached to the structural system. Curtain wall construction most frequently employs glass, metal panels, thin stone veneer, and other cladding materials, although louvers and vents, like glass panels, can also be set into the metal framework. Newer curtain wall systems may incorporate rain screens and glass fiber reinforced concrete panels (GFRC). Because curtain wall construction uses relatively lightweight and less expensive materials, it reduces building costs, which, in part, explains its popularity.



There are essentially two types of curtain wall systems: ***stick*** systems and ***unitized*** or ***modular*** systems. A ***stick*** system is a framing system composed of long metal pieces (sticks) put together individually using vertical pieces (mullions) between floors and horizontal pieces between the vertical members. The framing members may sometimes be assembled in a factory, but the installation and glazing is done on site. A ***unitized*** or ***modular*** curtain wall system consists of ready-to-hang, pre-assembled modules which already include glazing or other panel infill. These modular units are usually one story in height and approximately five- to six-feet wide. Both types of curtain walls are attached to floor slabs or columns with field-drilled bolts in mated, adjustable anchor brackets.

Glass panels in curtain wall systems can be fixed or operable and can include spandrel glass, clear, or tinted glass. Stone veneer panels may be slate, granite, marble, travertine, or limestone. Metal panels can be aluminum plate, stainless steel, copper, or other non-corrosive types of metal. Other materials used in curtain wall systems include composite panels (such as honeycomb composite panels, consisting of two thin sheets of aluminum bonded to a thin plastic layer or rigid insulation in the middle); architectural terra cotta; glazed ceramic tile; and fiber-reinforced plastic (FRP).

and corridors on upper floors to the private spaces behind them (i.e., offices, apartments, or hotel rooms). This hierarchy of spaces continues to define the historic character of many high-rise buildings. However, in commercial structures built on speculation with open floor plans, the upper floors, especially, are likely to have been reconfigured many times. In some cases, these interiors may have little historic character but, in others, the spaces and their appearance may have acquired significance because of a specific tenant, use (such as a boardroom or executive office), or an event.

Features and Finishes

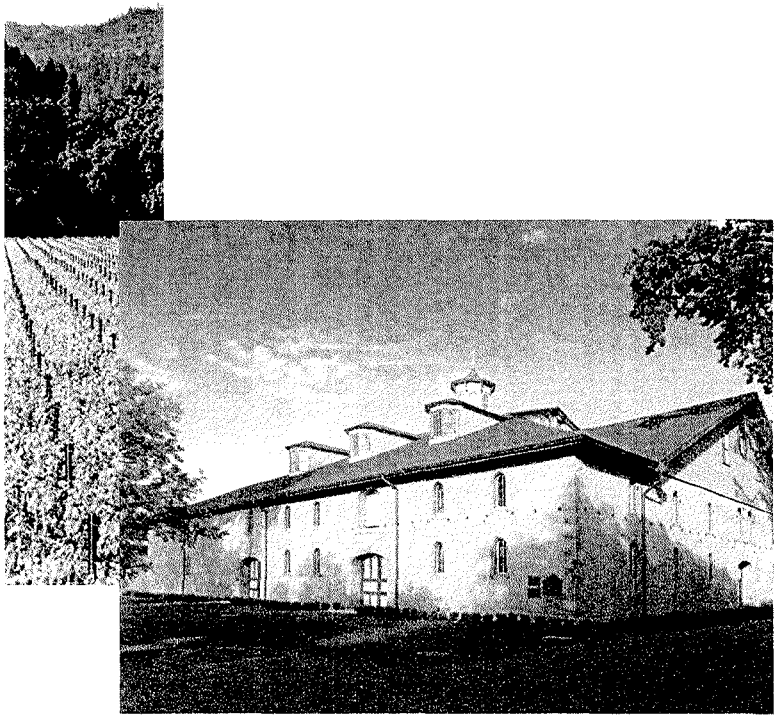
Historic character-defining features and finishes can range from very elaborate to very simple and plain, or from formal to utilitarian. The interior features that are important to a particular building generally reflect its original or historic use. Thus, the interior features and finishes of industrial and factory buildings are basic and practical, with exposed structural systems; wood, brick, or concrete walls and floors; large windows or monitors with clerestory windows to provide natural light; and minimal or no door and window surrounds. Commercial, office, hotel, and high-rise apartment buildings have public spaces that often include highly-decorated lobbies, elevator lobbies with marble flooring, wood or marble wainscoting in the upper corridors and, particularly in office buildings, offices separated from hallways by heavy doors with glass transoms and glass wall partitions for borrowed light. The repetitive pattern itself of the corridors on the upper floors in these multi-story buildings is also often significant in defining their historic character. Individual historic residential structures frequently have painted plaster walls and ceilings, door and window trim, fireplaces with mantels, wood flooring, and a staircase if the house has more than one story. Some mid-to late-20th-century houses that are less traditional in design have simpler and less-ornamented interiors.

Building Site

The building site consists of a historic building or buildings, structures, and associated landscape features and their relationship within a designed or legally-defined parcel of land. A site may be significant in its own right or because of its association with the historic building or buildings.

Setting (District/Neighborhood)

The setting is the larger area or environment in which a historic building is located. It may be an urban, suburban, or rural neighborhood or a natural landscape in which buildings have been constructed. The relationship of buildings to each other, setbacks, fence patterns, views, driveways and walkways, and street trees and other landscaping together establish the character of a district or neighborhood.

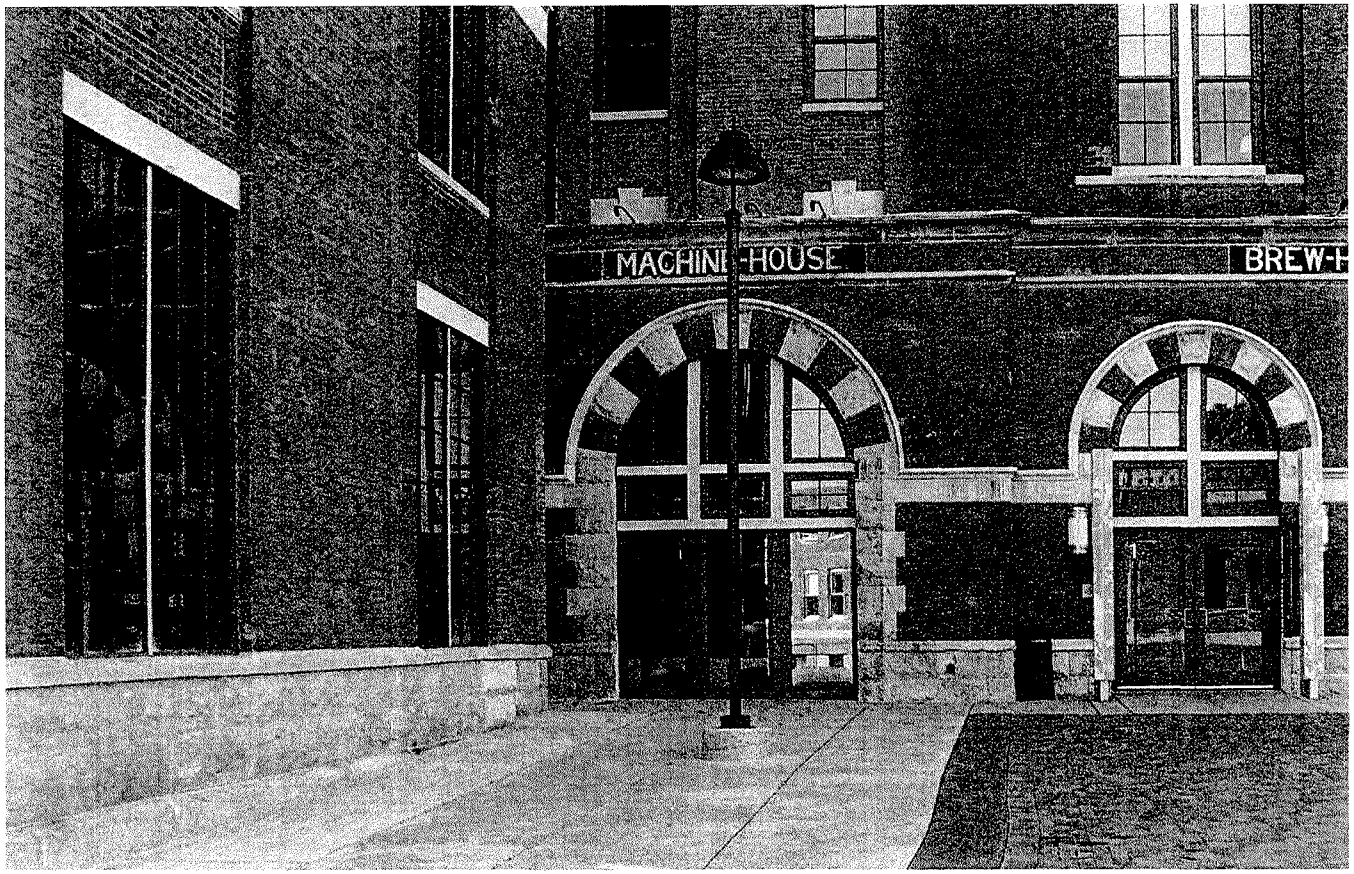


Special Requirements: Code-Required Work

Sensitive solutions to meeting code requirements are an important part of protecting the historic character of the building. Thus, work that must be done to meet accessibility and life-safety requirements must always be assessed for its potential impact on the historic building.

Accessibility

It is often necessary to make modifications to a historic building to make it compliant with accessibility code requirements. Federal rules, regulations, and standards provide guidance on how to make historic buildings accessible. Work must be carefully planned and undertaken in a manner that results in minimal or no loss of historic exterior and interior character-defining spaces, features, or finishes. The goal should be to provide the highest level of access with the least impact to the historic building.



Sustainability

Before implementing any energy improvements to enhance the sustainability of a historic building, the existing energy-efficient characteristics of the building should be evaluated. Historic building construction methods and materials often maximized natural sources of heating, lighting, and ventilation to respond to local climatic conditions. The key to a successful project is to identify and understand any lost original and existing energy-efficient aspects of the historic building, as well as to identify and understand its character-defining features to ensure they are taken into account. The most sustainable building may be one that already exists. Thus, good preservation practice is very often synonymous with sustainability. There are numerous treatments—traditional as well as new technological innovations—that may be used to upgrade a historic building to help it operate more efficiently while retaining its character.

The topic of sustainability is addressed in detail in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings.* Although specifically developed for the treatment Rehabilitation, the Sustainability Guidelines can be used to help guide the other treatments.

New Exterior Additions and Related New Construction

A new exterior addition to a historic building should be considered in a rehabilitation project only after determining that requirements for a new or continuing use cannot be successfully met by altering non-significant interior spaces. If the existing building cannot accommodate such requirements in this way, then an exterior addition or, in some instances, separate new construction on a site may be acceptable alternatives.

A new addition must preserve the building's historic character, form, significant materials, and features. It must be compatible with the massing, size, scale, and design of the historic building while differentiated from the historic building. It should also be designed and constructed so that the essential form and integrity of the historic building would remain if the addition were to be removed in the future. There is no formula or prescription for designing a compatible new addition or related new construction on a site, nor is there generally only one possible design approach that will meet the Standards.

New additions and related new construction that meet the Standards can be any architectural style—traditional, contemporary, or a simplified version of the historic building. However, there must be a balance between differentiation and compatibility to maintain the historic character and the identity of the building being enlarged.

New additions and related new construction that are either identical to the historic building or in extreme contrast to it are not compatible. Placing an addition on the rear or on another secondary elevation helps to ensure that it will be subordinate to the historic building. New construction should be appropriately scaled and located far enough away from the historic building to maintain its character and that of the site and setting. In urban or other built-up areas, new construction that appears as infill within the existing pattern of development can also preserve the historic character of the building, its site, and setting.

GUIDELINES FOR REHABILITATING HISTORIC BUILDINGS

INTRODUCTION

In **Rehabilitation,** historic building materials and character-defining features are protected and maintained as they are in the treatment Preservation. However, greater latitude is given in the **Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings** to replace extensively deteriorated, damaged, or missing features using either the same material or compatible substitute materials. Of the four treatments, only **Rehabilitation** allows alterations and the construction of a new addition, if necessary for a continuing or new use for the historic building.

Identify, Retain, and Preserve Historic Materials and Features

The guidance for the treatment **Rehabilitation** begins with recommendations to identify the form and detailing of those architectural materials and features that are important in defining the building's historic character and which must be retained to preserve that character. Therefore, guidance on ***identifying, retaining, and preserving*** character-defining features is always given first.

Protect and Maintain Historic Materials and Features

After identifying those materials and features that are important and must be retained in the process of **Rehabilitation** work, then ***protecting and maintaining*** them are addressed. Protection generally involves the least degree of intervention and is preparatory to other work. Protection includes the maintenance of historic materials and features as well as ensuring that the property is protected before and during rehabilitation work. A historic building undergoing rehabilitation will often require more extensive work. Thus, an overall evaluation of its physical condition should always begin at this level.

Repair Historic Materials and Features

Next, when the physical condition of character-defining materials and features warrants additional work, ***repairing*** is recommended. **Rehabilitation** guidance for the repair of historic materials, such as masonry, again begins with the least degree of intervention possible. In rehabilitation, repairing also includes the limited replacement in kind or with a compatible substitute material of extensively deteriorated or missing components of features when there are surviving prototypes features that can be substantiated by documentary and physical evidence. Although using the same kind of material is always the preferred option, a substitute material may be an acceptable alternative if the form, design, and scale, as well as the substitute material itself, can effectively replicate the appearance of the remaining features.

Replace Deteriorated Historic Materials and Features

Following repair in the hierarchy, **Rehabilitation** guidance is provided for ***replacing*** an entire character-defining feature with new material because the level of deterioration or damage of materials precludes repair. If the missing feature is character defining or if it is critical to the survival of the building (e.g., a roof), it should be replaced to match the historic feature based on physical or his-

toric documentation of its form and detailing. As with repair, the preferred option is always replacement of the entire feature in kind (i.e., with the same material, such as wood for wood). However, when this is not feasible, a compatible substitute material that can reproduce the overall appearance of the historic material may be considered.

It should be noted that, while the National Park Service guidelines recommend the replacement of an entire character-defining feature that is extensively deteriorated, the guidelines never recommend removal and replacement with new material of a feature that could reasonably be repaired and, thus, preserved.

Design for the Replacement of Missing Historic Features

When an entire interior or exterior feature is missing, such as a porch, it no longer plays a role in physically defining the historic character of the building unless it can be accurately recovered in form and detailing through the process of carefully documenting the historic appearance. If the feature is not critical to the survival of the building, allowing the building to remain without the feature is one option. But if the missing feature is important to the historic character of the building, its replacement is always recommended in the **Rehabilitation** guidelines as the first, or preferred, course of action. If adequate documentary and physical evidence exists, the feature may be accurately reproduced. A second option in a rehabilitation treatment for replacing a missing feature, particularly when the available information about the feature is inadequate to permit an accurate reconstruction, is to ***design*** a new feature that is compatible with the overall historic character of the building. The new design should always take into account the size, scale, and material of the building itself and should be clearly differentiated from the authentic historic features. For properties that have changed over time, and where those changes have acquired significance, reestablishing missing historic features generally should not be undertaken if the missing features did not coexist with the features currently on the building. Juxtaposing historic features that did not exist concurrently will result in a false sense of the building's history.

Alterations

Some exterior and interior alterations to a historic building are generally needed as part of a **Rehabilitation** project to ensure 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. Alterations may include changes to the site or setting, such as the selective removal of buildings or other features of the building site or setting that are intrusive, not character defining, or outside the building's period of significance.

Code-Required Work: Accessibility and Life Safety

Sensitive solutions to meeting code requirements in a **Rehabilitation** project are an important part of protecting the historic character of the building. Work that must be done to meet accessibility and life-safety requirements must also be assessed for its potential impact on the historic building, its site, and setting.

Resilience to Natural Hazards

Resilience to natural hazards should be addressed as part of a **Rehabilitation** project. A historic building may have existing characteristics or features that help to address or minimize the impacts of natural hazards. These should always be used to best advantage when considering new adaptive treatments so as to have the least impact on the historic character of the building, its site, and setting.

Sustainability

Sustainability should be addressed as part of a **Rehabilitation** project. Good preservation practice is often synonymous with sustainability. Existing energy-efficient features should be retained and repaired. Only sustainability treatments should be considered that will have the least impact on the historic character of the building.

The topic of sustainability is addressed in detail in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings.*

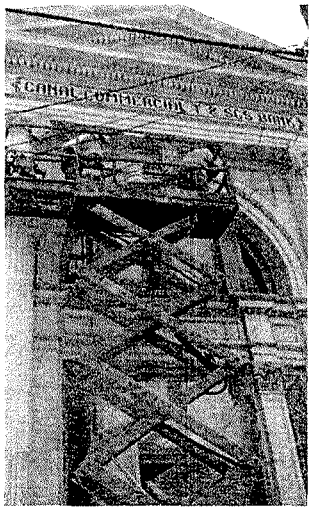
New Exterior Additions and Related New Construction

Rehabilitation is the only treatment that allows expanding a historic building by enlarging it with an addition. However, the **Rehabilitation** guidelines emphasize that new additions should be considered only after it is determined that meeting specific new needs cannot be achieved by altering non-character-defining interior spaces. If the use cannot be accommodated in this way, then an attached exterior addition may be considered. New additions should be designed and constructed so that the character-defining features of the historic building, its site, and setting are not negatively impacted. Generally, a new addition should be subordinate to the historic building. A new addition should be compatible, but differentiated enough so that it is not confused as historic or original to the building. The same guidance applies to new construction so that it does not negatively impact the historic character of the building or its site.

Rehabilitation as a Treatment. *When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular time is not appropriate, Rehabilitation may be considered as a treatment. Prior to undertaking work, a documentation plan for Rehabilitation should be developed.*

MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

RECOMMENDED	NOT RECOMMENDED
Identifying, retaining and preserving masonry features that are important in defining the overall historic character of the building (such as walls, brackets, railings, cornices, window and door surrounds, steps, and columns) and decorative ornament and other details, such as tooling and bonding patterns, coatings, and color.	Removing or substantially changing masonry features which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Replacing or rebuilding a major portion of exterior masonry walls that could be repaired, thereby destroying the historic integrity of the building. Applying paint or other coatings (such as stucco) to masonry that has been historically unpainted or uncoated to create a new appearance. Removing paint from historically-painted masonry.
Protecting and maintaining masonry by ensuring that historic drainage features and systems that divert rainwater from masonry surfaces (such as roof overhangs, gutters, and downspouts) are intact and functioning properly.	Failing to identify and treat the causes of masonry deterioration, such as leaking roofs and gutters or rising damp.
Cleaning masonry only when necessary to halt deterioration or remove heavy soiling.	Cleaning masonry surfaces when they are not heavily soiled to create a "like-new" appearance, thereby needlessly introducing chemicals or moisture into historic materials.
Carrying out masonry cleaning tests when it has been determined that cleaning is appropriate. Test areas should be examined to ensure that no damage has resulted and, ideally, monitored over a sufficient period of time to allow long-range effects to be predicted.	Cleaning masonry surfaces without testing or without sufficient time for the testing results to be evaluated.

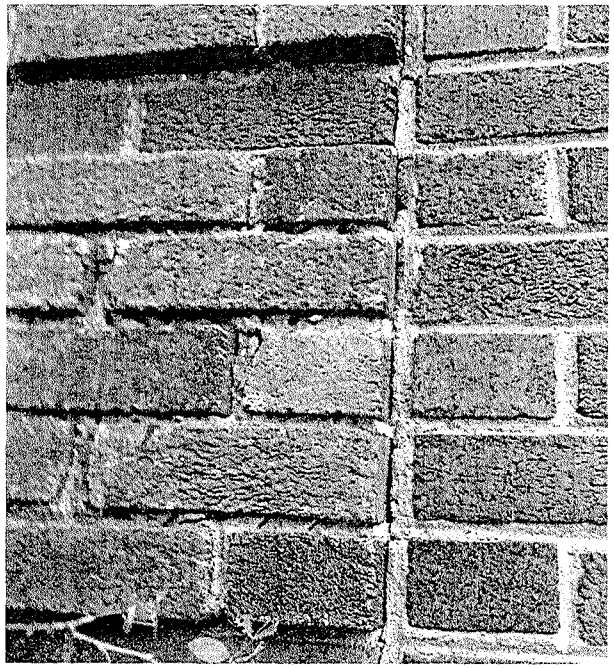


[i] An alkaline-based product is appropriate to use to clean historic marble because it will not damage the marble, which is acid sensitive.

MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

RECOMMENDED	NOT RECOMMENDED
Cleaning soiled masonry surfaces with the gentlest method possible, such as using low-pressure water and detergent and natural bristle or other soft-bristle brushes.	Cleaning or removing paint from masonry surfaces using most abrasive methods (including sandblasting, other media blasting, or high-pressure water) which can damage the surface of the masonry and mortar joints. Using a cleaning or paint-removal method that involves water or liquid chemical solutions when there is any possibility of freezing temperatures. Cleaning with chemical products that will damage some types of masonry (such as using acid on limestone or marble), or failing to neutralize or rinse off chemical cleaners from masonry surfaces.

[3] **Not Recommended:** The white film on the upper corner of this historic brick row house is the result of using a scrub or slurry coating, rather than traditional repointing by hand, which is the recommended method.



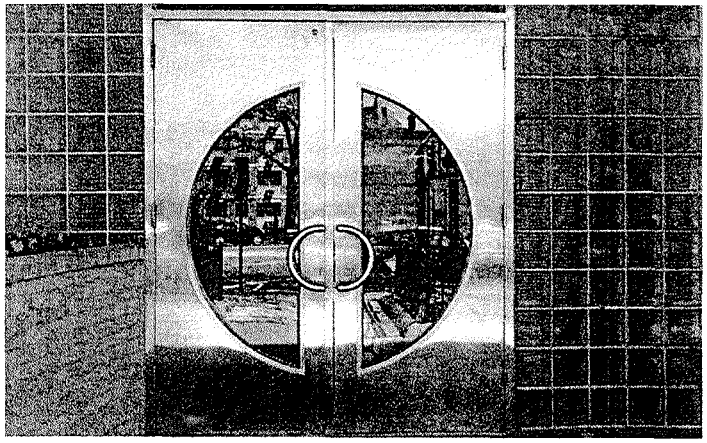
[4] **Not Recommended:** The quoins on the left side of the photo show that high-pressure abrasive blasting used to remove paint can damage even early 20th-century, hard-baked, textured brick and erode the mortar, whereas the same brick on the right, which was not abrasively cleaned, is undamaged.

MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

RECOMMENDED	NOT RECOMMENDED
Using biodegradable or environmentally-safe cleaning or paint-removal products.	
Using paint-removal methods that employ a poultice to which paint adheres, when possible, to neatly and safely remove old lead paint.	
Using coatings that encapsulate lead paint, when possible, where the paint is not required to be removed to meet environmental regulations.	
Allowing only trained conservators to use abrasive or laser-cleaning methods, when necessary, to clean hard-to-reach, highly-carved, or detailed decorative stone features.	
Removing damaged or deteriorated paint only to the next sound layer using the gentlest method possible (e.g., hand scraping) prior to repainting.	Removing paint that is firmly adhered to masonry surfaces, unless the building was unpainted historically and the paint can be removed without damaging the surface.
Applying compatible paint coating systems to historically-painted masonry following proper surface preparation.	Failing to follow manufacturers' product and application instructions when repainting masonry features.
Repainting historically-painted masonry features with colors that are appropriate to the historic character of the building and district.	Using paint colors on historically-painted masonry features that are not appropriate to the historic character of the building and district.
Protecting adjacent materials when cleaning or removing paint from masonry features.	Failing to protect adjacent materials when cleaning or removing paint from masonry features.
Evaluating the overall condition of the masonry to determine whether more than protection and maintenance, such as repairs to masonry features, will be necessary.	Failing to undertake adequate measures to ensure the protection of masonry features.
Repairing masonry by patching, splicing, consolidating, or otherwise reinforcing the masonry using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing parts of masonry features when there are surviving prototypes, such as terra-cotta brackets or stone balusters.	Removing masonry that could be stabilized, repaired, and conserved, or using untested consolidants and unskilled personnel, potentially causing further damage to historic materials. Replacing an entire masonry feature, such as a cornice or balustrade, when repair of the masonry and limited replacement of deteriorated or missing components are feasible.

METALS: WROUGHT AND CAST IRON, STEEL, PRESSED METAL, TERNEPLATE, COPPER, ALUMINUM, AND ZINC

RECOMMENDED	NOT RECOMMENDED
Identifying, retaining, and preserving metal features that are important in defining the overall historic character of the building (such as columns, capitals, pilasters, spandrel panels, or stairways) and their paints, finishes, and colors. The type of metal should be identified prior to work because each metal has its own properties and may require a different treatment.	Removing or substantially changing metal features which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Removing a major portion of the historic metal from a façade instead of repairing or replacing only the deteriorated metal, then reconstructing the façade with new material to achieve a uniform or "improved" appearance.
Protecting and maintaining metals from corrosion by providing proper drainage so that water does not stand on flat, horizontal surfaces or accumulate in curved decorative features.	Failing to identify and treat the causes of corrosion, such as moisture from leaking roofs or gutters. Placing incompatible metals together without providing an appropriate separation material. Such incompatibility can result in galvanic corrosion of the less noble metal (e.g., copper will corrode cast iron, steel, tin, and aluminum).
Cleaning metals when necessary to remove corrosion prior to repainting or applying appropriate protective coatings.	Leaving metals that must be protected from corrosion uncoated after cleaning.



[11] The stainless steel doors at the entrance to this Art Deco apartment building are important in defining its historic character and should be retained in place.

METALS: WROUGHT AND CAST IRON, STEEL, PRESSED METAL, TERNEPLATE, COPPER, ALUMINUM, AND ZINC

RECOMMENDED	NOT RECOMMENDED
Identifying the particular type of metal prior to any cleaning procedure and then testing to ensure that the gentlest cleaning method possible is selected; or, alternatively, determining that cleaning is inappropriate for the particular metal.	Using cleaning methods which alter or damage the color, texture, or finish of the metal, or cleaning when it is inappropriate for the particular metal. Removing the patina from historic metals. The patina may be a protective layer on some metals (such as bronze or copper) as well as a distinctive finish.
Using non-corrosive chemical methods to clean soft metals (such as lead, tinplate, terneplate, copper, and zinc) whose finishes can be easily damaged by abrasive methods.	Cleaning soft metals (such as lead, tinplate, terneplate, copper, and zinc) with abrasive methods (including sandblasting, other abrasive media, or high-pressure water) which will damage the surface of the metal.
Using the least abrasive cleaning method for hard metals (such as cast iron, wrought iron, and steel) to remove paint buildup and corrosion. If hand scraping and wire brushing have proven ineffective, low-pressure abrasive methods may be used as long as they do not abrade or damage the surface.	Using high-pressure abrasive techniques (including sandblasting, other media blasting, or high-pressure water) without first trying gentler cleaning methods prior to cleaning cast iron, wrought iron, or steel.
Applying appropriate paint or other coatings to historically-coated metals after cleaning to protect them from corrosion.	Applying paint or other coatings to metals (such as copper, bronze or stainless steel) if they were not coated historically, unless a coating is necessary for maintenance.
Repainting historically-painted metal features with colors that are appropriate to the building and district.	Using paint colors on historically-painted metal features that are not appropriate to the building or district.
Applying an appropriate protective coating (such as lacquer or wax) to a metal feature that was historically unpainted, such as a bronze door, which is subject to heavy use.	

ROOFS

RECOMMENDED	NOT RECOMMENDED
Identifying, retaining, and preserving roofs and their functional and decorative features that are important in defining the overall historic character of the building. The form of the roof (gable, hipped, gambrel, flat, or mansard) is significant, as are its decorative and functional features (such as cupolas, cresting, parapets, monitors, chimneys, weather vanes, dormers, ridge tiles, and snow guards), roofing material (such as slate, wood, clay tile, metal, roll roofing, or asphalt shingles), and size, color, and patterning.	Removing or substantially changing roofs which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Removing a major portion of the historic roof or roofing material that is repairable, then rebuilding it with new material to achieve a more uniform or "improved" appearance. Changing the configuration or shape of a roof by adding highly visible new features (such as dormer windows, vents, skylights, or a penthouse). Stripping the roof of sound historic material, such as slate, clay tile, wood, or metal.
Protecting and maintaining a roof by cleaning gutters and downspouts and replacing deteriorated flashing. Roof sheathing should also be checked for indications of moisture due to leaks or condensation.	Failing to clean and maintain gutters and downspouts properly so that water and debris collect and cause damage to roof features, sheathing, and the underlying roof structure.
Providing adequate anchorage for roofing material to guard against wind damage and moisture penetration.	Allowing flashing, caps, and exposed fasteners to corrode, which accelerates deterioration of the roof.
Protecting a leaking roof with a temporary waterproof membrane with a synthetic underlayment, roll roofing, plywood, or a tarpaulin until it can be repaired.	Leaving a leaking roof unprotected so that accelerated deterioration of historic building materials (such as masonry, wood, plaster, paint, and structural members) occurs.
Repainting a roofing material that requires a protective coating and was painted historically (such as a terneplate metal roof or gutters) as part of regularly-scheduled maintenance.	Failing to repaint a roofing material that requires a protective coating and was painted historically as part of regularly-scheduled maintenance.
Applying compatible paint coating systems to historically-painted roofing materials following proper surface preparation.	Applying paint or other coatings to roofing material if they were not coated historically.
Protecting a roof covering when working on other roof features.	Failing to protect roof coverings when working on other roof features.
Evaluating the overall condition of the roof and roof features to determine whether more than protection and maintenance, such as repairs to roof features, will be necessary.	Failing to undertake adequate measures to ensure the protection of roof features.

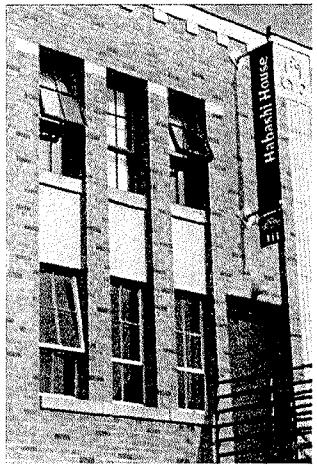
ROOFS

RECOMMENDED	NOT RECOMMENDED
Alterations and Additions for a New Use	
Installing mechanical and service equipment on the roof (such as heating and air-conditioning units, elevator housing, or solar panels) when required for a new use so that they are inconspicuous on the site and from the public right-of-way and do not damage or obscure character-defining historic features.	Installing roof-top mechanical or service equipment so that it damages or obscures character-defining roof features or is conspicuous on the site or from the public right-of-way.
Designing rooftop additions, elevator or stair towers, decks or terraces, dormers, or skylights when required by a new or continuing use so that they are inconspicuous and minimally visible on the site and from the public right-of-way and do not damage or obscure character-defining historic features.	Changing a character-defining roof form, or damaging or destroying character-defining roofing material as a result of an incompatible rooftop addition or improperly-installed or highly-visible mechanical equipment.
Installing a green roof or other roof landscaping, railings, or furnishings that are not visible on the site or from the public right-of-way and do not damage the roof structure.	Installing a green roof or other roof landscaping, railings, or furnishings that are visible on the site and from the public right-of-way.

[17] New wood elements have been used selectively to replace rotted wood on the underside of the roof in this historic warehouse.

WINDOWS

RECOMMENDED	NOT RECOMMENDED
Identifying, retaining, and preserving windows and their functional and decorative features that are important to the overall character of the building. The window material and how the window operates (e.g., double hung, casement, awning, or hopper) are significant, as are its components (including sash, muntins, ogee lugs, glazing, pane configuration, sills, mullions, casings, or brick molds) and related features, such as shutters.	Removing or substantially changing windows or window features which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Changing the appearance of windows that contribute to the historic character of the building by replacing materials, finishes, or colors which noticeably change the sash, depth of the reveal, and muntin configurations; the reflectivity and color of the glazing; or the appearance of the frame. Obscuring historic wood window trim with metal or other material. Replacing windows solely because of peeling paint, broken glass, stuck sash, or high air infiltration. These conditions, in themselves, do not indicate that windows are beyond repair.
Protecting and maintaining the wood or metal which comprises the window jamb, sash, and trim through appropriate treatments, such as cleaning, paint removal, and reapplication of protective coating systems.	Failing to protect and maintain window materials on a cyclical basis so that deterioration of the window results.
Protecting windows against vandalism before work begins by covering them and by installing alarm systems that are keyed into local protection agencies.	Leaving windows unprotected and subject to vandalism before work begins, thereby also allowing the interior to be damaged if it can be accessed through unprotected windows.
Making windows weathertight by recaulking gaps in fixed joints and replacing or installing weatherstripping.	
Protecting windows from chemical cleaners, paint, or abrasion during work on the exterior of the building.	Failing to protect historic windows from chemical cleaners, paint, or abrasion when work is being done on the exterior of the building.
Protecting and retaining historic glass when replacing putty or repairing other components of the window.	Failing to protect the historic glass when making window repairs.

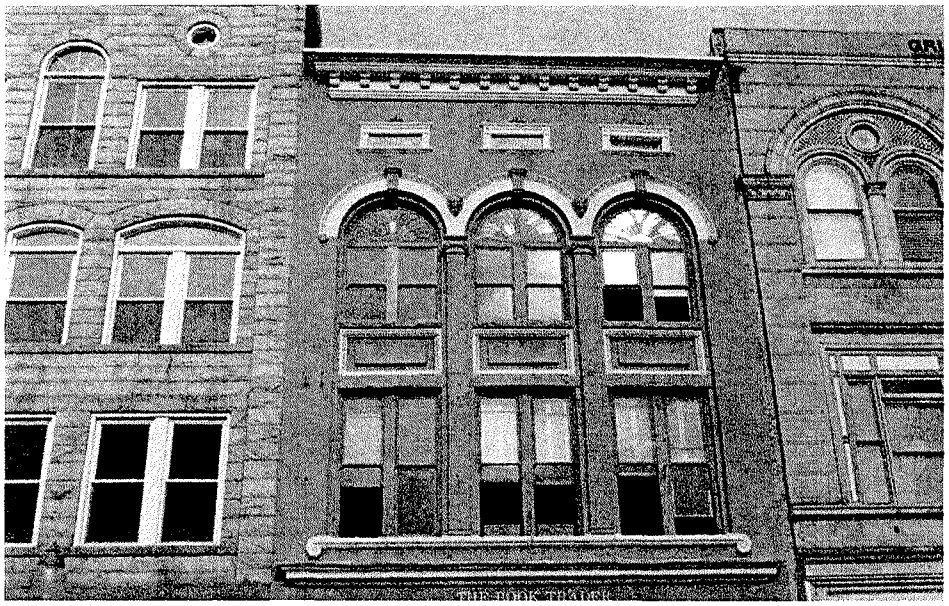


[21] The windows on the lower floor, which were too deteriorated to repair, were replaced with new steel windows matching the upper-floor historic windows that were retained.

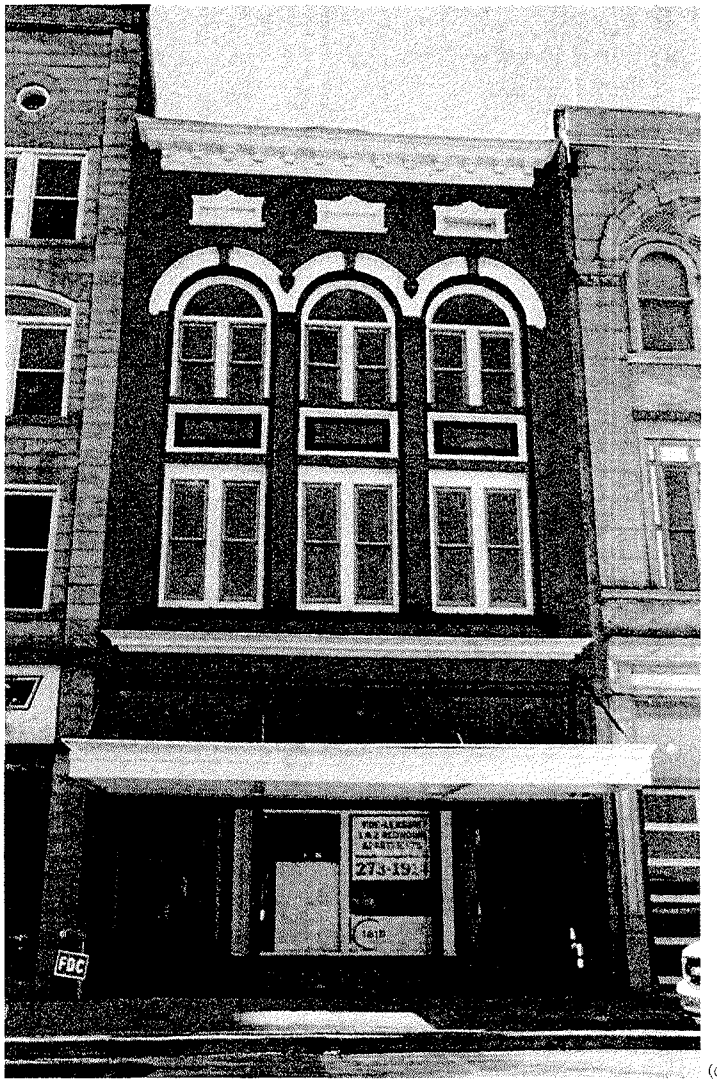
WINDOWS

RECOMMENDED	NOT RECOMMENDED
Modifying a historic single-glazed sash to accommodate insulated glass when it will not jeopardize the soundness of the sash or significantly alter its appearance.	Modifying a historic single-glazed sash to accommodate insulated glass when it will jeopardize the soundness of the sash or significantly alter its appearance.
Using low-e glass with the least visible tint in new or replacement windows.	Using low-e glass with a dark tint in new or replacement windows, thereby negatively impacting the historic character of the building.
Using window grids rather than true divided lights on windows on the upper floors of high-rise buildings if they will not be noticeable.	Using window grids rather than true divided lights on windows in low-rise buildings or on lower floors of high-rise buildings where they will be noticeable, resulting in a change to the historic character of the building.
Ensuring that spacer bars in between double panes of glass are the same color as the window sash.	Using spacer bars in between double panes of glass that are not the same color as the window sash.
Replacing all of the components in a glazing system if they have failed because of faulty design or materials that have deteriorated with new material that will improve the window performance without noticeably changing the historic appearance.	Replacing all of the components in a glazing system with new material that will noticeably change the historic appearance.
Replacing incompatible, non-historic windows with new windows that are compatible with the historic character of the building; or reinstating windows in openings that have been filled in.	
The following work is highlighted to indicate that it is specific to **Rehabilitation** *projects and should only be considered after the preservation concerns have been addressed.*	
Designing the Replacement for Missing Historic Features	
Designing and installing a new window or its components, such as frames, sash, and glazing, when the historic feature is completely missing. It may be an accurate restoration based on documentary and physical evidence, but only when the historic feature to be replaced coexisted with the features currently on the building. Or, it may be a new design that is compatible with the size, scale, material, and color of the historic building.	Creating an inaccurate appearance because the replacement for the missing window is based upon insufficient physical or historic documentation, is not a compatible design, or because the feature to be replaced did not coexist with the features currently on the building. Installing replacement windows made from other materials that are not the same as the material of the original windows if they would have a noticeably different appearance from the remaining historic windows.

(a)



(b)



(c)

[22] **Not Recommended:** (a-b) The original wood windows in this late-19th-century building, which were highly decorative, could likely have been repaired and retained. (c) Instead, they were replaced with new windows that do not match the detailing of the historic windows and, therefore, do not meet the Standards (above).

WINDOWS

RECOMMENDED	NOT RECOMMENDED
Alterations and Additions for a New Use	
Adding new window openings on rear or other secondary, less-visible elevations, if required by a new use. The new openings and the windows in them should be compatible with the overall design of the building but, in most cases, not duplicate the historic fenestration.	Changing the number, location, size, or glazing pattern of windows on primary or highly-visible elevations which will alter the historic character of the building. Cutting new openings on character-defining elevations or cutting new openings that damage or destroy significant features. Adding balconies at existing window openings or new window openings on primary or other highly-visible elevations where balconies never existed and, therefore, would be incompatible with the historic character of the building.
Replacing windows that are too deteriorated to repair using the same sash and pane configuration, but with new windows that operate differently, if necessary, to accommodate a new use. Any change must have minimal visual impact. Examples could include replacing hopper or awning windows with casement windows, or adding a realigned and enlarged operable portion of industrial steel windows to meet life-safety codes.	Replacing a window that contributes to the historic character of the building with a new window that is different in design (such as glass divisions or muntin profiles), dimensions, materials (wood, metal, or glass), finish or color, or location that will have a noticeably different appearance from the historic windows, which may negatively impact the character of the building.
Installing impact-resistant glazing, when necessary for security, so that it is compatible with the historic windows and does not damage them or negatively impact their character.	Installing impact-resistant glazing, when necessary for security, that is incompatible with the historic windows and that damages them or negatively impacts their character.
Using compatible window treatments (such as frosted glass, appropriate shades or blinds, or shutters) to retain the historic character of the building when it is necessary to conceal mechanical equipment, for example, that the new use requires be placed in a location behind a window or windows on a primary or highly-visible elevation.	Removing a character-defining window to conceal mechanical equipment or to provide privacy for a new use of the building by blocking up the opening.

Re: 3333 California Street, San Francisco, CA
Record Number: 2015-014028ENV/CUA/PCA/MAP/DVA

Laurel Heights Improvement Association Appeal of Planning Commission's Certification of Final EIR/ CEQA Findings

Board of Supervisors File No: 191035

Exhibits to Statement of Petree A. Powell, MCP, JD

EXHIBIT A - Part 2

[24] Rotted boards in the beaded-board porch ceiling are being replaced with new matching beaded board.

ENTRANCES AND PORCHES

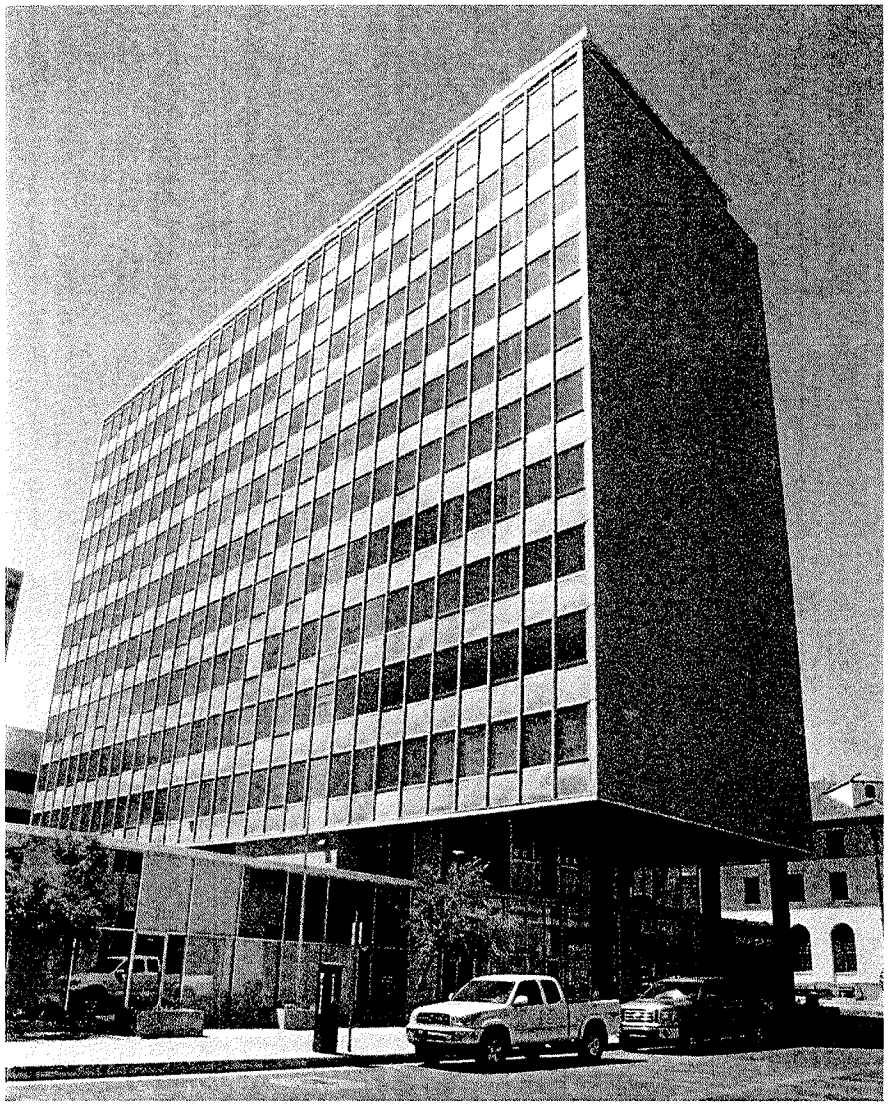
RECOMMENDED	NOT RECOMMENDED
Identifying, retaining, and preserving entrances and porches and their functional and decorative features that are important in defining the overall historic character of the building. The materials themselves (including masonry, wood, and metal) are significant, as are their features, such as doors, transoms, pilasters, columns, balustrades, stairs, roofs, and projecting canopies.	Removing or substantially changing entrances and porches which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Cutting new entrances on a primary façade. Altering utilitarian or service entrances so they compete visually with the historic primary entrance; increasing their size so that they appear significantly more important; or adding decorative details that cannot be documented to the building or are incompatible with the building's historic character.
Retaining a historic entrance or porch even though it will no longer be used because of a change in the building's function.	Removing a historic entrance or porch that will no longer be required for the building's new use.
Protecting and maintaining the masonry, wood, and metals which comprise entrances and porches through appropriate surface treatments, such as cleaning, paint removal, and reapplication of protective coating systems.	Failing to protect and maintain entrance and porch materials on a cyclical basis so that deterioration of entrances and porches results.
Protecting entrances and porches against arson and vandalism before work begins by covering them and by installing alarm systems keyed into local protection agencies.	Leaving entrances and porches unprotected and subject to vandalism before work begins, thereby also allowing the interior to be damaged if it can be accessed through unprotected entrances.
Protecting entrance and porch features when working on other features of the building.	Failing to protect materials and features when working on other features of the building.
Evaluating the overall condition of entrances and porches to determine whether more than protection and maintenance, such as repairs to entrance and porch features, will be necessary.	Failing to undertake adequate measures to ensure the protection of entrance and porch features.
Repairing entrances and porches by patching, splicing, consolidating, and otherwise reinforcing them using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated features or missing components of features when there are surviving prototypes, such as balustrades, columns, and stairs.	Removing entrances and porches that could be stabilized, repaired, and conserved, or using untested consolidants, improper repair techniques, or unskilled personnel, potentially causing further damage to historic materials. Replacing an entire entrance or porch feature when repair of the feature and limited replacement of deteriorated or missing components are feasible.

CURTAIN WALLS

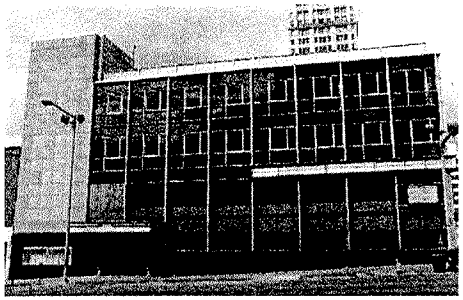
RECOMMENDED	NOT RECOMMENDED
Identifying, retaining, and preserving curtain wall systems and their components (metal framing members and glass or opaque panels) that are important in defining the overall historic character of the building. The design of the curtain wall is significant, as are its component materials (metal stick framing and panel materials, such as clear or spandrel glass, stone, terra cotta, metal, and fiber-reinforced plastic), appearance (e.g., glazing color or tint, transparency, and reflectivity), and whether the glazing is fixed, operable or louvered glass panels. How a curtain wall is engineered and fabricated, and the fact that it expands and contracts at a different rate from the building's structural system, are important to understand when undertaking the rehabilitation of a curtain wall system.	Removing or substantially changing curtain wall components which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Replacing historic curtain wall features instead of repairing or replacing only the deteriorated components.
Protecting and maintaining curtain walls and their components through appropriate surface treatments, such as cleaning, paint removal, and reapplication of protective coating systems; and by making them watertight and ensuring that sealants and gaskets are in good condition.	Failing to protect and maintain curtain wall components on a cyclical basis so that deterioration of curtain walls results. Failing to identify, evaluate, and treat various causes of curtain wall failure, such as open gaps between components where sealants have deteriorated or are missing.
Protecting ground-level curtain walls from vandalism before work begins by covering them, while ensuring adequate ventilation, and by installing alarm systems keyed into local protection agencies.	Leaving ground-level curtain walls unprotected and subject to vandalism before work begins, thereby also allowing the interior to be damaged if it can be accessed through unprotected glazing.
Protecting curtain walls when working on other features of the building.	Failing to protect curtain walls when working on other features of the building.
Cleaning curtain wall systems only when necessary to halt deterioration or to remove heavy soiling.	Cleaning curtain wall systems when they are not heavily soiled, thereby needlessly introducing chemicals or moisture into historic materials.

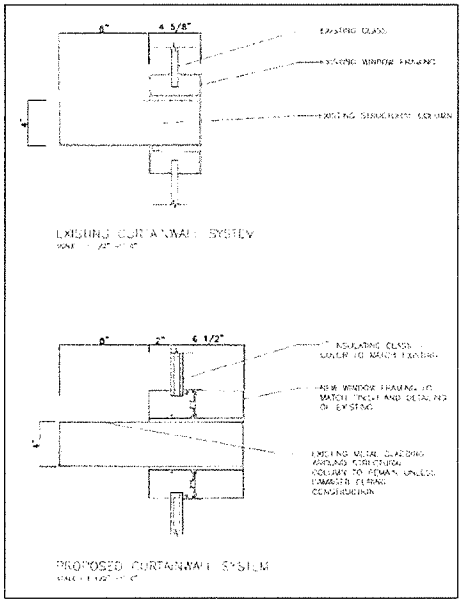
CURTAIN WALLS

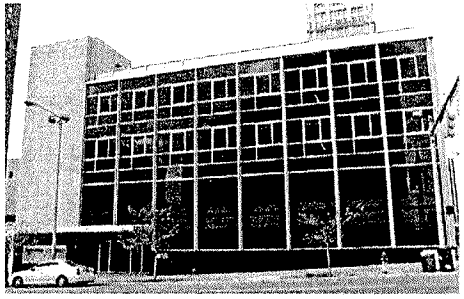
RECOMMENDED	NOT RECOMMENDED
Carrying out cleaning tests, when it has been determined that cleaning is appropriate, using only cleaning materials that will not damage components of the system, including factory-applied finishes. Test areas should be examined to ensure that no damage has resulted.	Cleaning curtain wall systems without testing or using cleaning materials that may damage components of the system.
Evaluating the overall condition of curtain walls to determine whether more than protection and maintenance, such as repair of curtain wall components, will be necessary.	Failing to undertake adequate measures to protect curtain wall components.
Repairing curtain walls by ensuring that they are watertight by augmenting existing components or replacing deteriorated or missing sealants or gaskets, where necessary, to seal any gaps between system components. Repair may include the limited replacement of those extensively deteriorated or missing components of curtain walls when there are surviving prototypes.	Removing curtain wall components that could be repaired or using improper repair techniques. Replacing an entire curtain wall system when repair of materials and limited replacement of deteriorated or missing components are feasible.
Applying sealants carefully so that they are not readily visible.	
Replacing in kind a component or components of a curtain wall system that are too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature. If using the same kind of material is not feasible, then a compatible substitute material may be considered as long as it has the same finish and appearance.	Removing a curtain wall component or the entire system, if necessary, that is unrepairable and not replacing it or replacing it with a new component or system that does not convey the same appearance.
Replacing masonry, metal, glass, or other components of a curtain wall system (or the entire system, if necessary) which have failed because of faulty design with substitutes that match the original as closely as possible and which will reestablish the viability and performance of the system.	Using substitute material for the replacement that does not convey the same appearance of the surviving components of the curtain wall or that is physically incompatible.



[30] Rather than replace the original curtain wall system of the 1954 Simms Building in Albuquerque, NM, with a different color tinted glass or coat it with a non-historic reflective film, the HVAC system was updated to improve energy efficiency. *Photo: Harvey M. Kaplan.*







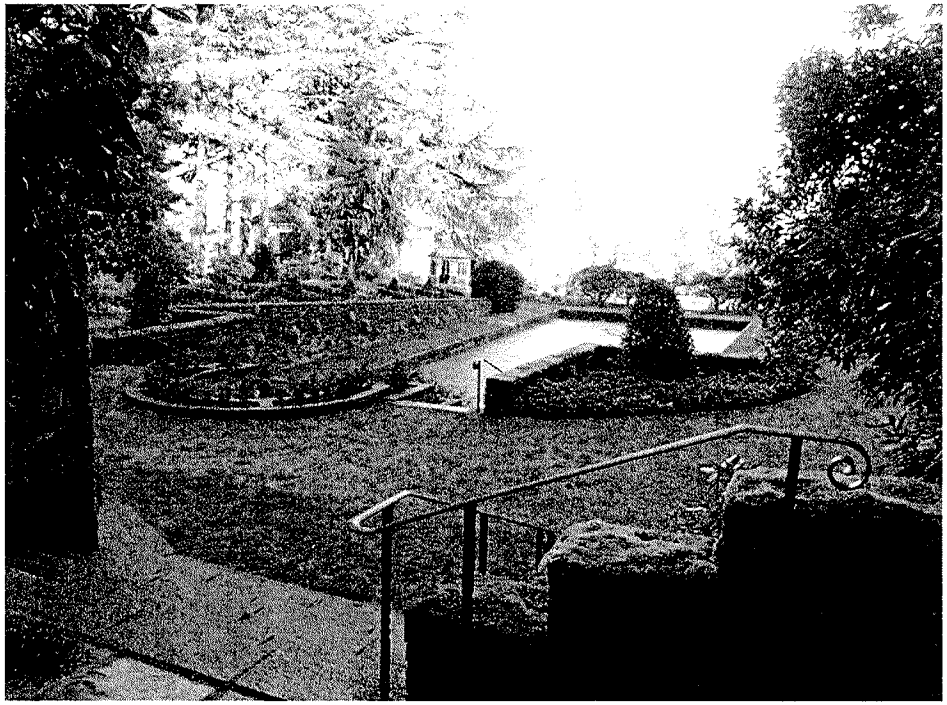
[31 a-c:] (a) The rehabilitation of the First Federal Savings and Loan Association building in Birmingham, AL, constructed in 1961, required replacing the deteriorated historic curtain wall system because the framing and the fasteners holding the spandrel glass and the windows had failed. (b) Comparative drawings show that the differences between the replacement system, which incorporated new insulated glass to meet wind-load requirements, and the original system are minimal. (c) The replacement system, shown after completion of the project, has not altered the historic character of the building.

CURTAIN WALLS

RECOMMENDED	NOT RECOMMENDED
The following work is highlighted to indicate that it is specific to **Rehabilitation** *projects and should only be considered after the preservation concerns have been addressed.*	
Designing the Replacement for Missing Historic Features	
Designing and installing a new curtain wall or its components when the historic feature is completely missing. It may be an accurate restoration based on documentary and physical evidence, but only when the historic feature to be replaced coexisted with the features currently on the building. Or, it may be a new design that is compatible with the size, scale, material, and color of the historic building.	Creating an inaccurate appearance because the replacement for the missing curtain wall component is based upon insufficient physical or historic documentation, is not a compatible design, or because the feature did not coexist with the features currently on the building. Introducing a new curtain wall component that is incompatible in size, scale, material, color, and finish.
Alterations and Additions for a New Use	
Installing new glazing or an entire new curtain wall system, when necessary to meet safety-code requirements, with dimensions, detailing, materials, colors, and finish as close as possible to the historic curtain wall components.	Installing new glazing or an entire new curtain wall system, when necessary to meet safety-code requirements, with dimensions and detailing that is significantly different from the historic curtain wall components.
Installing impact-resistant glazing, when necessary for security, so that it is compatible with the historic windows and does not damage them or negatively impact their character.	Installing impact-resistant glazing in a curtain wall system, when necessary for security, that is incompatible with the historic curtain walls and damages them or negatively impacts their character.

BUILDING SITE

RECOMMENDED	NOT RECOMMENDED
Identifying, retaining, and preserving features of the building site that are important in defining its overall historic character. Site features may include walls, fences, or steps; circulation systems, such as walks, paths or roads; vegetation, such as trees, shrubs, grass, orchards, hedges, windbreaks, or gardens; landforms, such as hills, terracing, or berms; furnishings and fixtures, such as light posts or benches; decorative elements, such as sculpture, statuary, or monuments; water features, including fountains, streams, pools, lakes, or irrigation ditches; and subsurface archeological resources, other cultural or religious features, or burial grounds which are also important to the site.	Removing or substantially changing buildings and their features or site features which are important in defining the overall historic character of the property so that, as a result, the character is diminished.



[42] This garden is an important character-defining landscape feature on this college campus.

BUILDING SITE

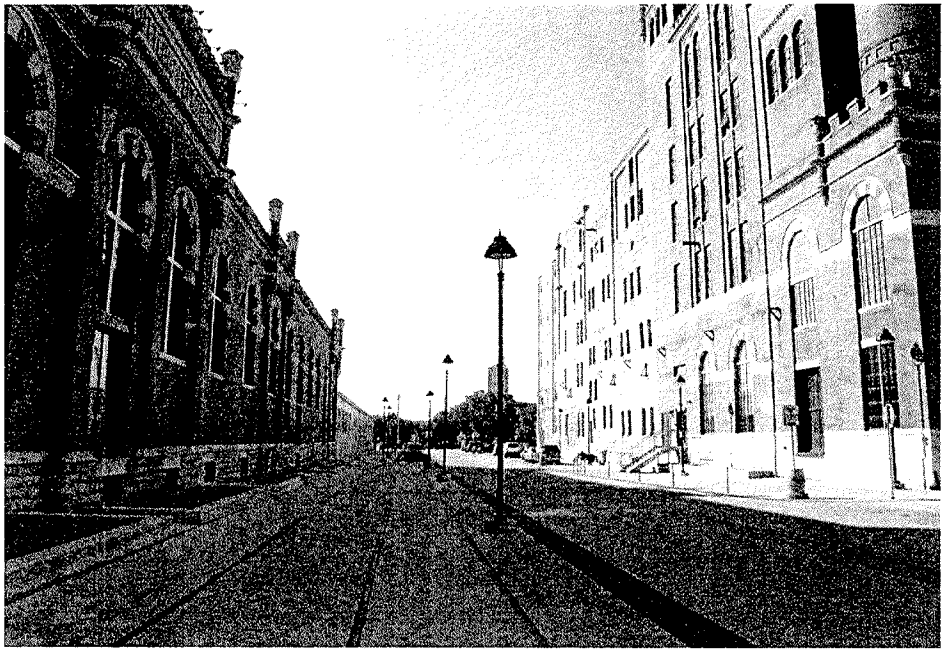
RECOMMENDED	NOT RECOMMENDED
Retaining the historic relationship between buildings and the landscape.	Removing or relocating buildings or landscape features, thereby destroying the historic relationship between buildings and the landscape. Removing or relocating buildings on a site or in a complex of related historic structures (such as a mill complex or farm), thereby diminishing the historic character of the site or complex. Moving buildings onto the site, thereby creating an inaccurate historic appearance. Changing the grade level of the site if it diminishes its historic character. For example, lowering the grade adjacent to a building to maximize use of a basement, which would change the historic appearance of the building and its relation to the site.
Protecting and maintaining buildings and site features by providing proper drainage to ensure that water does not erode foundation walls, drain toward the building, or damage or erode the landscape.	Failing to ensure that site drainage is adequate so that buildings and site features are damaged or destroyed; or, alternatively, changing the site grading so that water does not drain properly.
Correcting any existing irrigation that may be wetting the building excessively.	Neglecting to correct any existing irrigation that may be wetting the building excessively.
Minimizing disturbance of the terrain around buildings or elsewhere on the site, thereby reducing the possibility of destroying or damaging important landscape features, archeological resources, other cultural or religious features, or burial grounds.	Using heavy machinery or equipment in areas where it may disturb or damage important landscape features, archeological resources, other cultural or religious features, or burial grounds.
Surveying and documenting areas where the terrain will be altered to determine the potential impact to important landscape features, archeological resources, other cultural or religious features, or burial grounds.	Failing to survey the building site prior to beginning work, which may result in damage or loss of important landscape features, archeological resources, other cultural or religious features, or burial grounds.

BUILDING SITE

RECOMMENDED	NOT RECOMMENDED
Protecting (e.g., preserving in place) important site features, archeological resources, other cultural or religious features, or burial grounds.	Leaving known site features or archeological material unprotected so that it is damaged during rehabilitation work.
Planning and carrying out any necessary investigation before rehabilitation begins, using professional archeologists and methods, when preservation in place is not feasible.	Allowing unqualified personnel to perform data recovery on archeological resources, which can result in damage or loss of important archeological material
Preserving important landscape features through regularly-scheduled maintenance of historic plant material.	Allowing important landscape features or archeological resources to be lost, damaged, or to deteriorate due to inadequate protection or lack of maintenance
Protecting the building site and landscape features against arson and vandalism before rehabilitation work begins by erecting temporary fencing and by installing alarm systems keyed into local protection agencies.	Leaving the property unprotected and subject to vandalism before work begins so that the building site and landscape features, archeological resources, other cultural or religious features, or burial grounds can be damaged or destroyed. Removing or destroying features from the site, such as fencing, paths or walkways, masonry balustrades, or plant material.
Installing protective fencing, bollards, and stanchions on a building site, when necessary for security, that are as unobtrusive as possible.	Installing protective fencing, bollards, and stanchions on a building site, when necessary for security, without taking into consideration their location and visibility so that they negatively impact the historic character of the site.
Providing continued protection and maintenance of buildings and landscape features on the site through appropriate grounds and landscape management.	Failing to protect and maintain materials and features from the restoration period on a cyclical basis so that deterioration of the site results.
Protecting buildings and landscape features when working on the site.	Failing to protect building and landscape features during work on the site or failing to repair damaged or deteriorated site features.

BUILDING SITE

RECOMMENDED	NOT RECOMMENDED
Evaluating the overall condition of materials and features to determine whether more than protection and maintenance, such as repairs to site features, will be necessary.	Failing to undertake adequate measures to ensure the protection of the site.
Repairing historic site features which have been damaged, are deteriorated, or have missing components order reestablish the whole feature and to ensure retention of the integrity of the historic materials. Repairs may include limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing parts of site features when there are surviving prototypes, such as paving, railings, or individual plants within a group (e.g., a hedge). Repairs should be physically and visually compatible.	Removing materials and features that could be repaired or using improper repair techniques. Replacing an entire feature of the site (such as a fence, walkway, or drive) when repair of materials and limited replacement of deteriorated or missing components are feasible.



[43] The industrial character of the site was retained when this brewery complex was rehabilitated for residential use.

[44] **Not Recommended:** (a-b) The historic character of this plantation house (marked in blue on plan on opposite page) and its site was diminished and adversely impacted when multiple new buildings like this (#3 on plan) were constructed on the property (c).

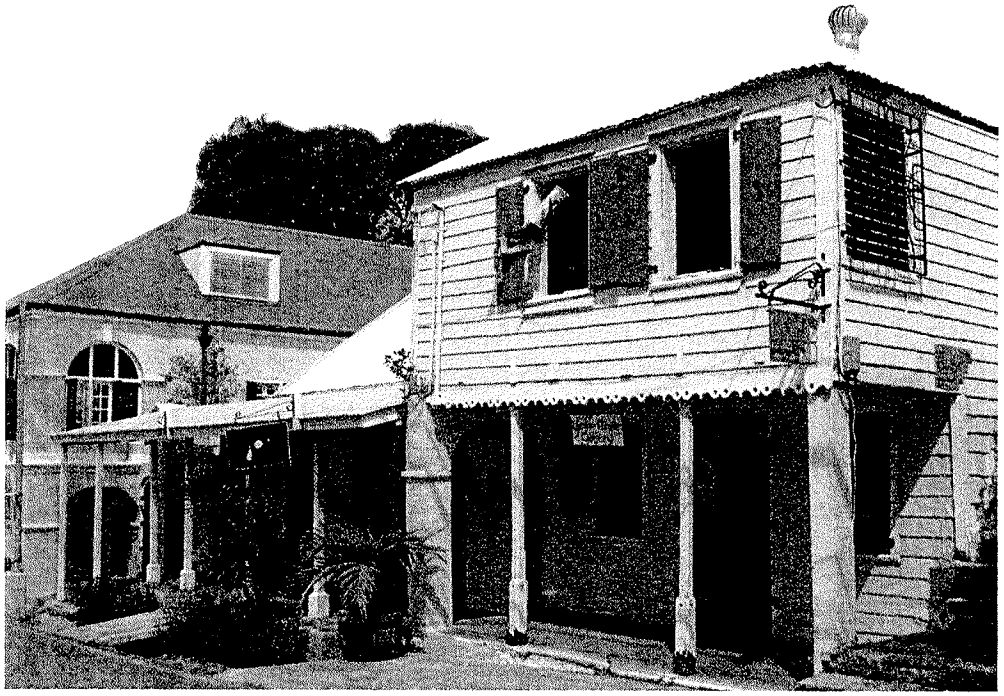
[45] Undertaking a survey to document archeological resources may be considered in some rehabilitation projects when a new exterior addition is planned.

BUILDING SITE

RECOMMENDED	NOT RECOMMENDED
The following work is highlighted to indicate that it is specific to **Rehabilitation** *projects and should only be considered after the preservation concerns have been addressed.*	
Designing the Replacement for Missing Historic Features	
Designing and installing a new feature on a site when the historic feature is completely missing. This could include missing outbuildings, terraces, drives, foundation plantings, specimen trees, and gardens. The design may be an accurate restoration based on documentary and physical evidence, but only when the feature to be replaced coexisted with the features currently on the site. Or, it may be a new design that is compatible with the historic character of the building and site.	Creating an inaccurate appearance because the replacement for the missing feature is based upon insufficient physical or historic documentation, is not a compatible design, or because the feature did not coexist with the features currently on the site. Introducing a new feature, including plant material, that is visually incompatible with the site or that alters or destroys the historic site patterns or use.
Alterations and Additions for a New Use	
Designing new onsite features (such as parking areas, access ramps, or lighting), when required by a new use, so that they are as unobtrusive as possible, retain the historic relationship between the building or buildings and the landscape, and are compatible with the historic character of the property.	Locating parking areas directly adjacent to historic buildings where vehicles may cause damage to buildings or landscape features or when they negatively impact the historic character of the building site if landscape features and plant materials are removed.
Designing new exterior additions to historic buildings or adjacent new construction that are compatible with the historic character of the site and preserves the historic relationship between the building or buildings and the landscape.	Introducing new construction on the building site which is visually incompatible in terms of size, scale, design, material, or color, which destroys historic relationships on the site, or which damages or destroys important landscape features, such as replacing a lawn with paved parking areas or removing mature trees to widen a driveway.
Removing non-significant buildings, additions, or site features which detract from the historic character of the site.	Removing a historic building in a complex of buildings or removing a building feature or a landscape feature which is important in defining the historic character of the site.
Locating an irrigation system needed for a new or continuing use of the site where it will not cause damage to historic buildings.	Locating an irrigation system needed for a new or continuing use of the site where it will damage historic buildings.

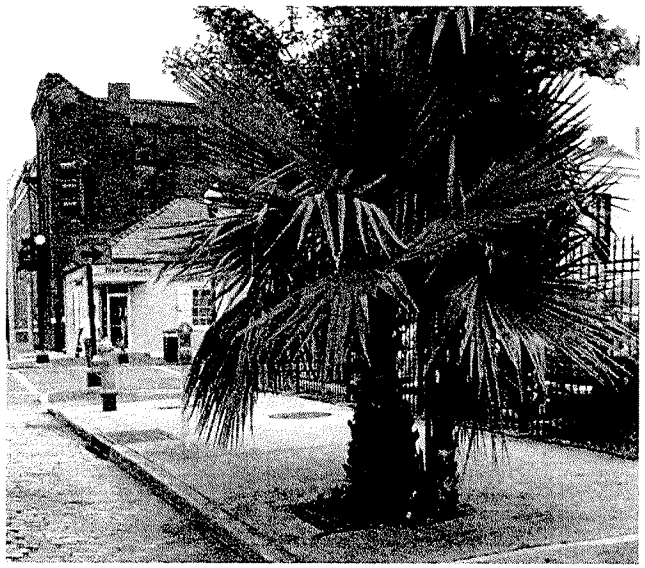
SETTING (DISTRICT / NEIGHBORHOOD)

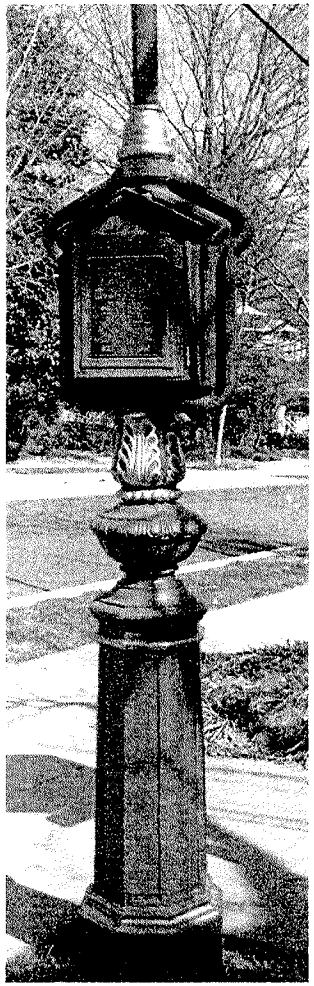
RECOMMENDED	NOT RECOMMENDED
Identifying, retaining, and preserving building and landscape features that are important in defining the overall historic character of the setting. Such features can include circulation systems, such as roads and streets; furnishings and fixtures, such as light posts or benches; vegetation, gardens and yards; adjacent open space, such as fields, parks, commons, or woodlands; and important views or visual relationships.	Removing or substantially changing those building and landscape features in the setting which are important in defining the historic character so that, as a result, the character is diminished.



[46] The varied size, shapes, and architectural styles of these historic buildings are unique to this street in Christiansted, St. Croix, USVI, and should be retained in a rehabilitation project.

[47] Original paving stones contribute to the character of the historic setting and distinguish this block from other streets in the district.

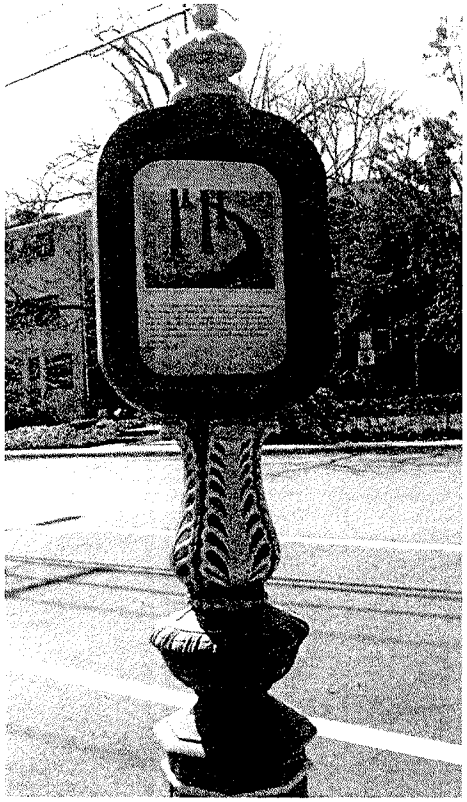




[48] Old police and fire call boxes, which are distinctive features in this historic district, have been retained, and now showcase work by local artists.

SETTING (DISTRICT / NEIGHBORHOOD)

RECOMMENDED	NOT RECOMMENDED
Retaining the historic relationship between buildings and landscape features in the setting. For example, preserving the relationship between a town common or urban plaza and the adjacent houses, municipal buildings, roads, and landscape and streetscape features.	Altering the relationship between the buildings and landscape features in the setting by widening existing streets, changing landscape materials, or locating new streets or parking areas where they may negatively impact the historic character of the setting. Removing or relocating buildings or landscape features, thereby destroying the historic relationship between buildings and the landscape in the setting.



[49] Low stone walls are character-defining features in this hilly, early-20th-century residential neighborhood.

SETTING (DISTRICT / NEIGHBORHOOD)

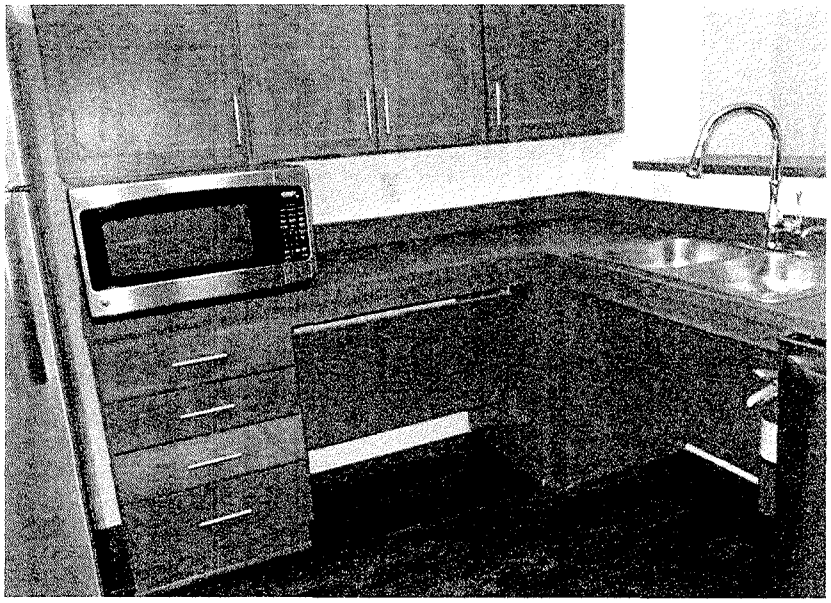
RECOMMENDED	NOT RECOMMENDED
Protecting and maintaining historic features in the setting through regularly-scheduled maintenance and grounds and landscape management.	Failing to protect and maintain materials in the setting on a cyclical basis so that deterioration of buildings and landscape features results. Stripping or removing historic features from buildings or the setting, such as a porch, fencing, walkways, or plant material.
Installing protective fencing, bollards, and stanchions in the setting, when necessary for security, that are as unobtrusive as possible.	Installing protective fencing, bollards, and stanchions in the setting, when necessary for security, without taking into consideration their location and visibility so that they negatively impact the historic character of the setting.
Protecting buildings and landscape features when undertaking work in the setting.	Failing to protect buildings and landscape features during work in the setting.
Evaluating the overall condition of materials and features to determine whether more than protection and maintenance, such as repairs to materials and features in the setting, will be necessary.	Failing to undertake adequate measures to ensure the protection of materials and features in the setting.
Repairing features in the setting by reinforcing the historic materials. Repairs may include the replacement in kind or with a compatible substitute material of those extensively deteriorated or missing parts of setting features when there are surviving prototypes, such as fencing, paving materials, trees, and hedgerows. Repairs should be physically and visually compatible.	Failing to repair and reinforce damaged or deteriorated historic materials and features in the setting. Removing material that could be repaired or using improper repair techniques. Replacing an entire feature of the building or landscape in the setting when repair of materials and limited replacement of deteriorated or missing components are feasible.

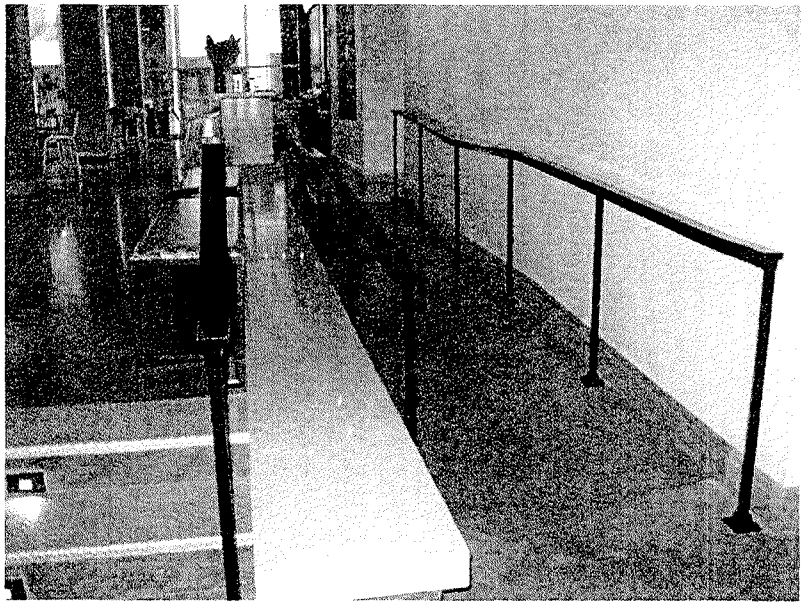
SETTING (DISTRICT / NEIGHBORHOOD)

RECOMMENDED	NOT RECOMMENDED
Replacing in kind an entire building or landscape feature in the setting that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature. If using the same kind of material is not feasible, then a compatible substitute material may be considered.	Removing a character-defining feature of the building or landscape from the setting that is unrepairable and not replacing it or replacing it with a new feature that does not match. Using a substitute material for the replacement that does not convey the same appearance of the surviving building or landscape feature in the setting or that is physically or ecologically incompatible.
The following work is highlighted to indicate that it is specific to **Rehabilitation** *projects and should only be considered after the preservation concerns have been addressed.*	
Designing the Replacement for Missing Historic Features	
Designing and installing a new feature of the building or landscape in the setting when the historic feature is completely missing. This could include missing steps, streetlights, terraces, trees, and fences. The design may be an accurate restoration based on documentary and physical evidence, but only when the feature to be replaced coexisted with the features currently in the setting. Or, it may be a new design that is compatible with the historic character of the setting.	Creating an inaccurate appearance because the replacement for the missing feature is based upon insufficient physical or historic documentation; is not a compatible design, or because the feature did not coexist with the features currently in the setting. Introducing a new building or landscape feature that is visually or otherwise incompatible with the setting's historic character (e.g., replacing low metal fencing with a high wood fence).
Alterations and Additions for a New Use	
Designing new features (such as parking areas, access ramps, or lighting), when required by a new use, so that they are as unobtrusive as possible, retain the historic relationships between buildings and the landscape in the setting, and are compatible with the historic character of the setting.	Locating parking areas directly adjacent to historic buildings where vehicles may cause damage to buildings or landscape features or when they negatively impact the historic character of the setting if landscape features and plant materials are removed.
Designing new exterior additions to historic buildings or adjacent new construction that are compatible with the historic character of the setting that preserve the historic relationship between the buildings and the landscape.	Introducing new construction into historic districts which is visually incompatible or that destroys historic relationships within the setting, or which damages or destroys important landscape features.
Removing non-significant buildings, additions, or landscape features which detract from the historic character of the setting.	Removing a historic building, a building feature, or landscape feature which is important in defining the historic character of the setting.

CODE-REQUIRED WORK

RECOMMENDED	NOT RECOMMENDED
Sensitive solutions to meeting accessibility and life-safety code requirements are an important part of protecting the historic character of the building and site. Thus, work that must be done to meet use-specific code requirements should be considered early in planning a ***Rehabilitation*** *of a historic building for a new use. Because code mandates are directly related to occupancy, some uses require less change than others and, thus, may be more appropriate for a historic building. Early coordination with code enforcement authorities can reduce the impact of alterations necessary to comply with current codes.*	
ACCESSIBILITY	
Identifying the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting which may be affected by accessibility code-required work.	Undertaking accessibility code-required alterations before identifying those exterior features, interior spaces, features, and finishes, and features of the site and setting which are character defining and, therefore, must be preserved.
Complying with barrier-free access requirements in such a manner that the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible.	Altering, damaging, or destroying character-defining exterior features, interior spaces, features, and finishes, or features of the site and setting while making modifications to a building, its site, or setting to comply with accessibility requirements.





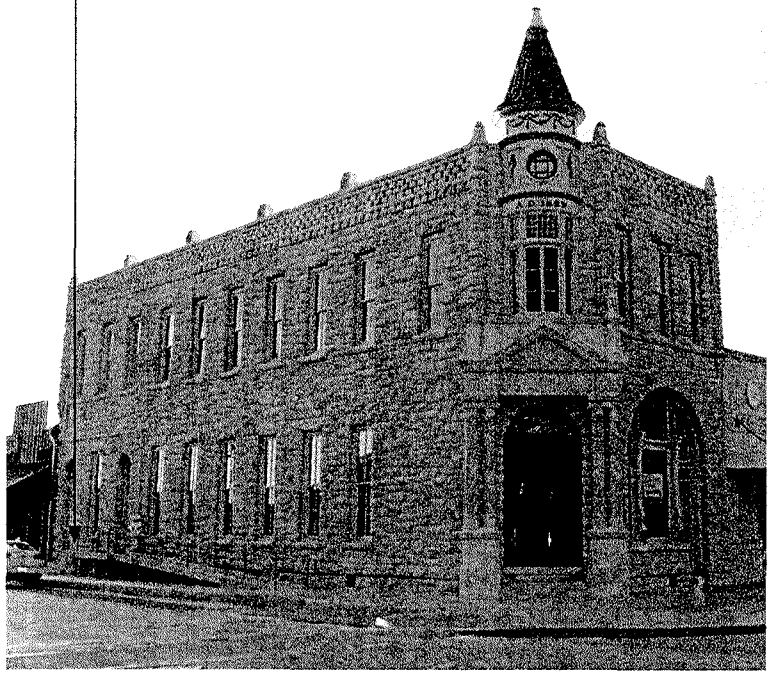
[50] This kitchen in a historic apartment complex was rehabilitated to meet accessibility requirements.

[51] A new interior access ramp with a simple metal railing is compatible with the character of this mid-century-modern building.

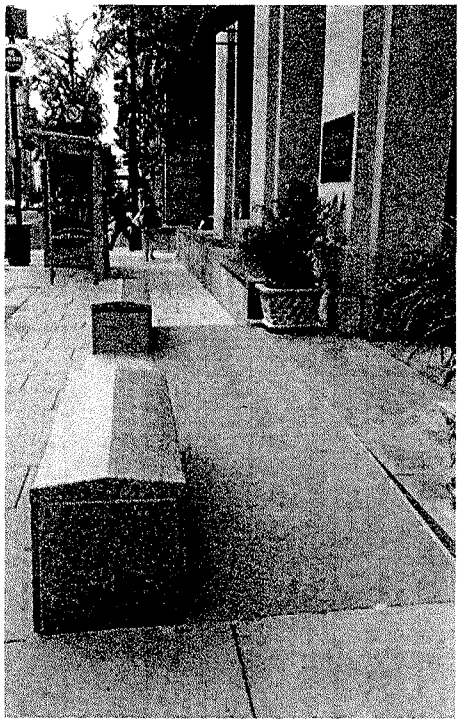
CODE-REQUIRED WORK

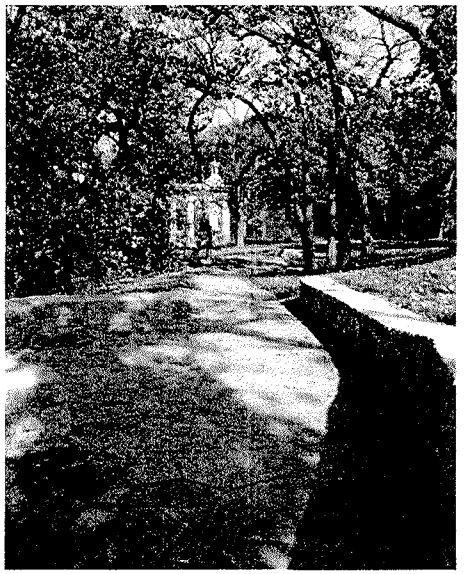
RECOMMENDED	NOT RECOMMENDED
Working with specialists in accessibility and historic preservation to determine the most sensitive solutions to comply with access requirements in a historic building, its site, or setting.	Making changes to historic buildings, their sites, or setting without first consulting with specialists in accessibility and historic preservation to determine the most appropriate solutions to comply with accessibility requirements.
Providing barrier-free access that promotes independence for the user while preserving significant historic features.	Making modifications for accessibility that do not provide independent, safe access while preserving historic features.
Finding solutions to meet accessibility requirements that minimize the impact of any necessary alteration on the historic building, its site, and setting, such as compatible ramps, paths, and lifts.	Making modifications for accessibility without considering the impact on the historic building, its site, and setting.

[52] The access ramp blends in with the stone façade of the First National Bank in Stephenville, TX, and is appropriately located on the side where it is does not impact the historic character of the building. *Photo: Nancy McCoy, QuimbyMcCoy Preservation Architecture, LLP.*



[53] This entrance ramp (right) is compatible with the historic character of this commercial building.

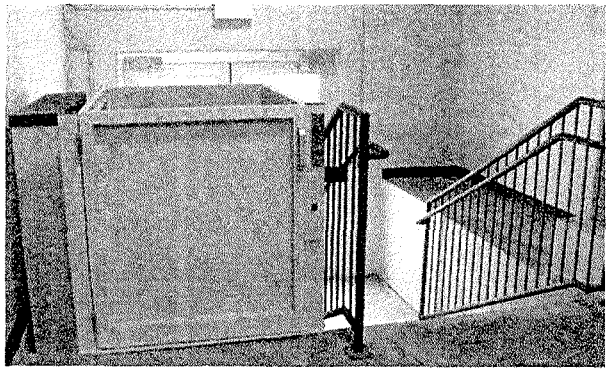




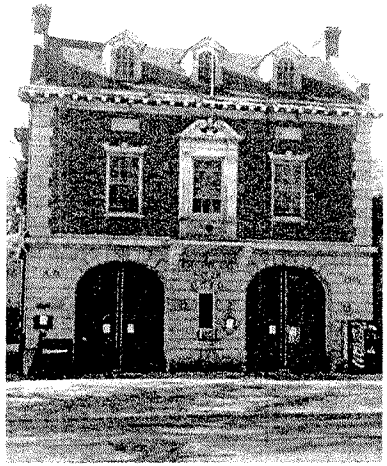
[54] The gently-sloped path in a historic park in Kansas City, MO, which accesses the memorial below, includes a rest area part way up the hill. *Photo: STRATA Architecture + Preservation.*

CODE-REQUIRED WORK

RECOMMENDED	NOT RECOMMENDED
Using relevant sections of existing codes regarding accessibility for historic buildings that provide alternative means of code compliance when code-required work would otherwise negatively impact the historic character of the property.	
Minimizing the impact of accessibility ramps by installing them on secondary elevations when it does not compromise accessibility or by screening them with plantings.	Installing elevators, lifts, or incompatible ramps at a primary entrance, or relocating primary entrances to secondary locations to provide access without investigating other options or locations.
Adding a gradual slope or grade to the sidewalk, if appropriate, to access the entrance rather than installing a ramp that would be more intrusive to the historic character of the building and the district.	
Adding an exterior stair or elevator tower that is compatible with the historic character of the building in a minimally-visible location only when it is not possible to accommodate it on the interior without resulting in the loss of significant historic spaces, features, or finishes.	
Installing a lift as inconspicuously as possible when it is necessary to locate it on a primary elevation of the historic building.	
Installing lifts or elevators on the interior in secondary or less significant spaces where feasible.	Installing lifts or elevators on the interior in primary spaces which will negatively impact the historic character of the space.



[55] The lift is compatible with the industrial character of this former warehouse.



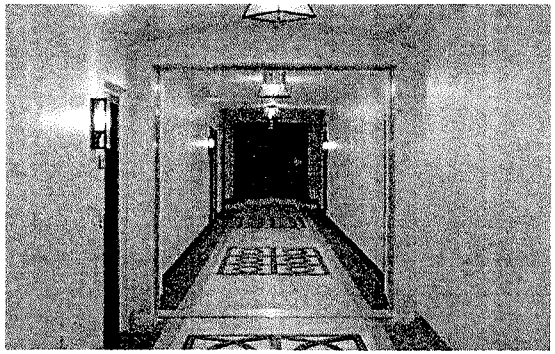
CODE-REQUIRED WORK

RECOMMENDED	NOT RECOMMENDED
LIFE SAFETY	
Identifying the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting which may be affected by life-safety code-required work.	Undertaking life-safety code-required alterations before identifying those exterior features, interior spaces, features, and finishes, and features of the site and setting which are character defining and, therefore, must be preserved.
Complying with life-safety codes (including requirements for impact-resistant glazing, security, and seismic retrofit) in such a manner that the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible.	Altering, damaging, or destroying character-defining exterior features, interior spaces, features, and finishes, or features of the site and setting while making modifications to a building, its site, or setting to comply with life-safety code requirements.
Removing building materials only after testing has been conducted to identify hazardous materials, and using only the least damaging abatement methods.	Removing building materials without testing first to identify the hazardous materials, or using potentially damaging methods of abatement.
Providing workers with appropriate personal equipment for protection from hazards on the worksite.	Removing hazardous or toxic materials without regard for workers' health and safety or environmentally-sensitive disposal of the materials.
Working with code officials and historic preservation specialists to investigate systems, methods, or devices to make the building compliant with life-safety codes to ensure that necessary alterations will be compatible with the historic character of the building.	Making life-safety code-required changes to the building without consulting code officials and historic preservation specialists, with the result that alterations negatively impact the historic character of the building.
Using relevant sections of existing codes regarding life safety for historic buildings that provide alternative means of code compliance when code-required work would otherwise negatively impact the historic character of the building.	

[56 a-b] In order to continue in its historic use, the door openings of this 1916 Colonial Revival-style fire station had to be widened to accommodate the larger size of modern fire trucks. Although this resulted in some change to the arched door surrounds, it is minimal and does not negatively impact the historic character of the building. (a) Above, before; *Photo: Fire and Emergency Medical Services Department (FEMS), Washington, D.C.;* below, after.

CODE-REQUIRED WORK

RECOMMENDED	NOT RECOMMENDED
Upgrading historic stairways and elevators to meet life-safety codes so that they are not damaged or otherwise negatively impacted.	Damaging or making inappropriate alterations to historic stairways and elevators or to adjacent features, spaces, or finishes in the process of doing work to meet code requirements.
Installing sensitively-designed fire-suppression systems, such as sprinklers, so that historic features and finishes are preserved.	Covering character-defining wood features with fire-retardant sheathing, which results in altering their appearance.
Applying fire-retardant coatings when appropriate, such as intumescent paint, to protect steel structural systems.	Using fire-retardant coatings if they will damage or obscure character-defining features.
Adding a new stairway or elevator to meet life-safety code requirements in a manner that preserves adjacent character-defining features and spaces.	Altering, damaging, or destroying character-defining spaces, features, or finishes when adding a new code-required stairway or elevator.
Using existing openings on secondary or less-visible elevations or, if necessary, creating new openings on secondary or less-visible elevations to accommodate second egress requirements.	Using a primary or other highly-visible elevation to accommodate second egress requirements without investigating other options or locations.
Placing a code-required stairway or elevator that cannot be accommodated within the historic building in a new exterior addition located on a secondary or minimally-visible elevation.	Constructing a new addition to accommodate code-required stairs or an elevator on character-defining elevations or where it will obscure, damage, or destroy character-defining features of the building, its site, or setting.
Designing a new exterior stairway or elevator tower addition that is compatible with the historic character of the building.	



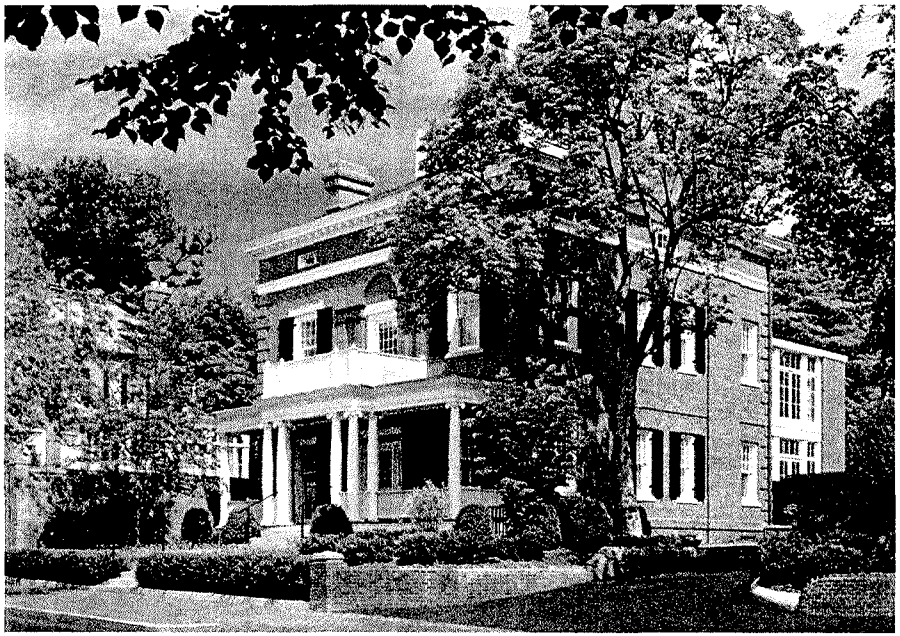
[58] Fire doors that retract into the walls have been installed here (not visible in photo) preserve the historic character of this corridor.

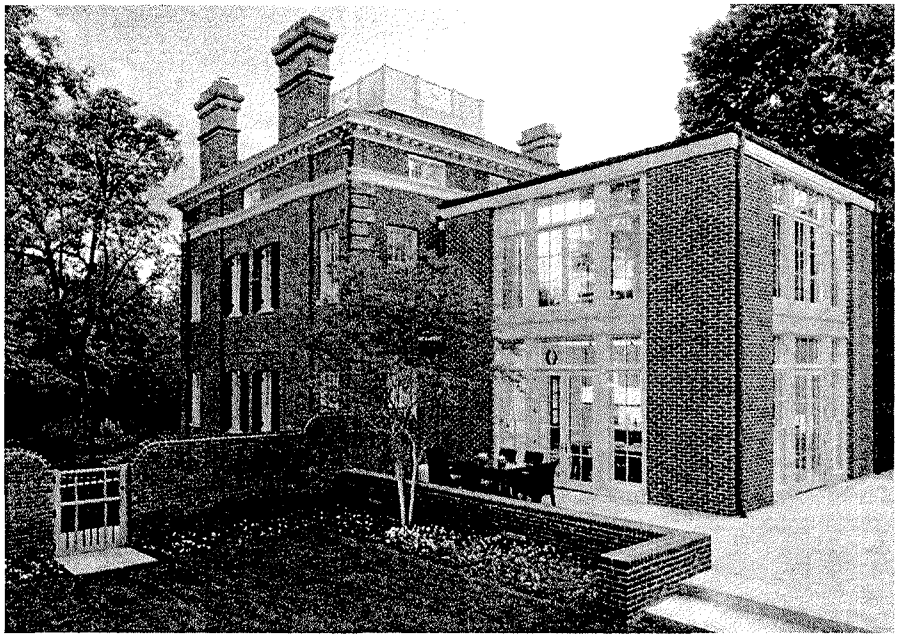
NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
New Additions	
Placing functions and services required for a new use (including elevators and stairways) in secondary or non-character-defining interior spaces of the historic building rather than constructing a new addition.	Expanding the size of the historic building by constructing a new addition when requirements for the new use could be met by altering non-character-defining interior spaces.
Constructing a new addition on a secondary or non-character-defining elevation and limiting its size and scale in relationship to the historic building.	Constructing a new addition on or adjacent to a primary elevation of the building which negatively impacts the building's historic character.
Constructing a new addition that results in the least possible loss of historic materials so that character-defining features are not obscured, damaged, or destroyed.	Attaching a new addition in a manner that obscures, damages, or destroys character-defining features of the historic building.
Designing a new addition that is compatible with the historic building.	Designing a new addition that is significantly different and, thus, incompatible with the historic building.
Ensuring that the addition is subordinate and secondary to the historic building and is compatible in massing, scale, materials, relationship of solids to voids, and color.	Constructing a new addition that is as large as or larger than the historic building, which visually overwhelms it (i.e., results in the diminution or loss of its historic character).

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
Using the same forms, materials, and color range of the historic building in a manner that does not duplicate it, but distinguishes the addition from the original building.	Duplicating the exact form, material, style, and detailing of the historic building in a new addition so that the new work appears to be historic.
Basing the alignment, rhythm, and size of the window and door openings of the new addition on those of the historic building.	
Incorporating a simple, recessed, small-scale hyphen, or connection, to physically and visually separate the addition from the historic building.	
Distinguishing the addition from the original building by setting it back from the wall plane of the historic building.	





[61 a-b] The materials, design, and location at the back of the historic house are important factors in making this a compatible new addition. *Photos: © Maxwell MacKenzie.*

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
Ensuring that the addition is stylistically appropriate for the historic building type (e.g., whether it is residential or institutional).	
Considering the design for a new addition in terms of its relationship to the historic building as well as the historic district, neighborhood, and setting.	

[62] The stair tower at the rear of this commercial building is a compatible new addition.

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
Rooftop Additions	
Designing a compatible rooftop addition for a multi-story building, when required for a new use, that is set back at least one full bay from the primary and other highly-visible elevations and that is inconspicuous when viewed from surrounding streets.	Constructing a rooftop addition that is highly visible, which negatively impacts the character of the historic building, its site, setting, or district.

[63] (a) A mockup should be erected to demonstrate the visibility of a proposed rooftop addition and its potential impact on the historic building. Based on review of this mockup (orange marker), it was determined that the rooftop addition would meet the Standards (b). The addition is unobtrusive and blends in with the building behind it.

New addition

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

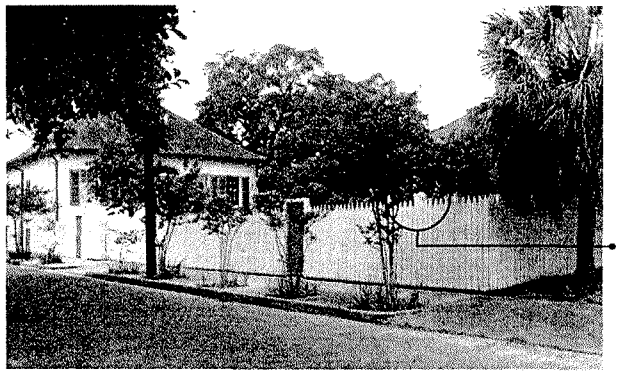
RECOMMENDED	NOT RECOMMENDED
Limiting a rooftop addition to one story in height to minimize its visibility and its impact on the historic character of the building.	Constructing a highly-visible, multi-story rooftop addition that alters the building's historic character. Constructing a rooftop addition on low-rise, one- to three-story historic buildings that is highly visible, overwhelms the building, and negatively impacts the historic district. Constructing a rooftop addition with amenities (such as a raised pool deck with plantings, HVAC equipment, or screening) that is highly visible and negatively impacts the historic character of the building.

[64] **Not Recommended:** It is generally not appropriate to construct a rooftop addition on a low-rise, two- to three-story building such as this, because it negatively affects its historic character.

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
Related New Construction	
Adding a new building to a historic site or property only if the requirements for a new or continuing use cannot be accommodated within the existing structure or structures.	Adding a new building to a historic site or property when the project requirements could be accommodated within the existing structure or structures.
Locating new construction far enough away from the historic building, when possible, where it will be minimally visible and will not negatively affect the building's character, the site, or setting.	Placing new construction too close to the historic building so that it negatively impacts the building's character, the site, or setting.

[65] (a) This (far left) is a compatible new outbuilding constructed on the site of a historic plantation house (b). Although traditional in design, it is built of wood to differentiate it from the historic house (which is scored stucco) located at the back of the site so as not to impact the historic house, and minimally visible from the public right-of-way (c).



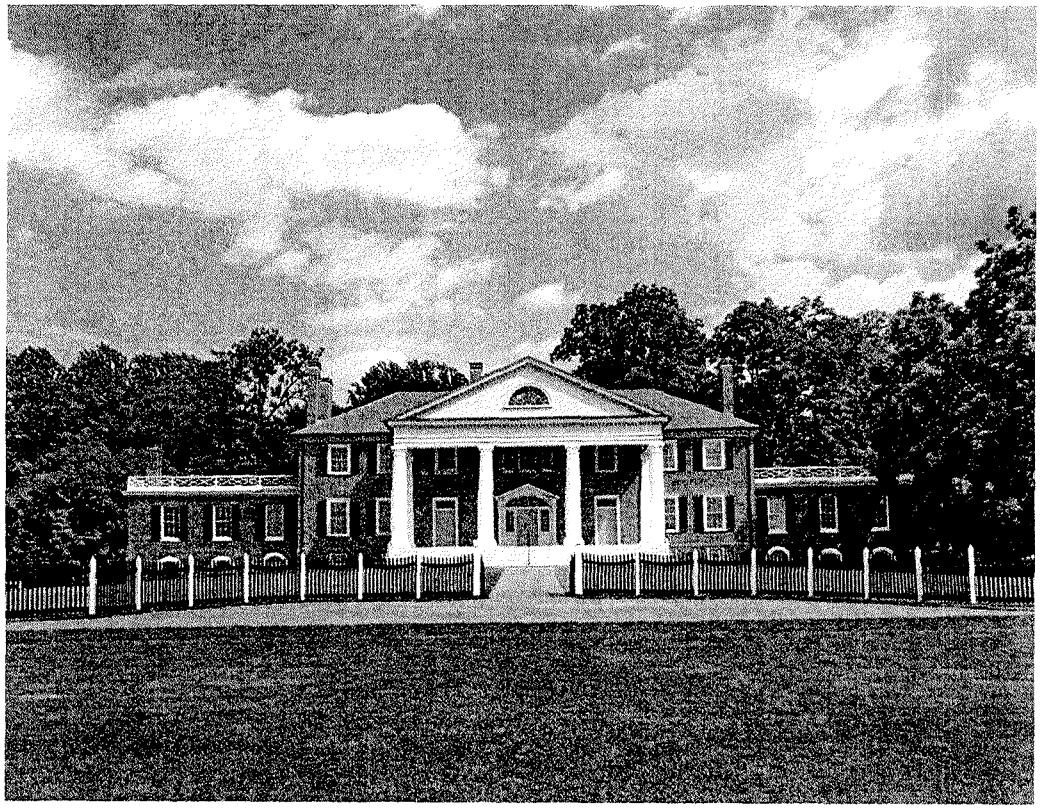
NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
Designing new construction on a historic site or in a historic setting that it is compatible but differentiated from the historic building or buildings.	Replicating the features of the historic building when designing a new building, with the result that it may be confused as historic or original to the site or setting.
Considering the design for related new construction in terms of its relationship to the historic building as well as the historic district and setting.	
Ensuring that new construction is secondary to the historic building and does not detract from its significance.	Adding new construction that results in the diminution or loss of the historic character of the building, including its design, materials, location, or setting. Constructing a new building on a historic property or on an adjacent site that is much larger than the historic building. Designing new buildings or groups of buildings to meet a new use that are not compatible in scale or design with the character of the historic building and the site, such as apartments on a historic school property that are too residential in appearance.
Using site features or land formations, such as trees or sloping terrain, to help minimize the new construction and its impact on the historic building and property.	
Designing an addition to a historic building in a densely-built location (such as a downtown commercial district) to appear as a separate building or infill, rather than as an addition. In such a setting, the addition or the infill structure must be compatible with the size and scale of the historic building and surrounding buildings—usually the front elevation of the new building should be in the same plane (i.e., not set back from the historic building). This approach may also provide the opportunity for a larger addition or infill when the façade can be broken up into smaller elements that are consistent with the scale of the historic building and surrounding buildings.	

STANDARDS FOR RESTORATION &
GUIDELINES FOR RESTORING HISTORIC BUILDINGS

Restoration

Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.



Re: 3333 California Street, San Francisco, CA
Record Number: 2015-014028ENV/CUA/PCA/MAP/DVA

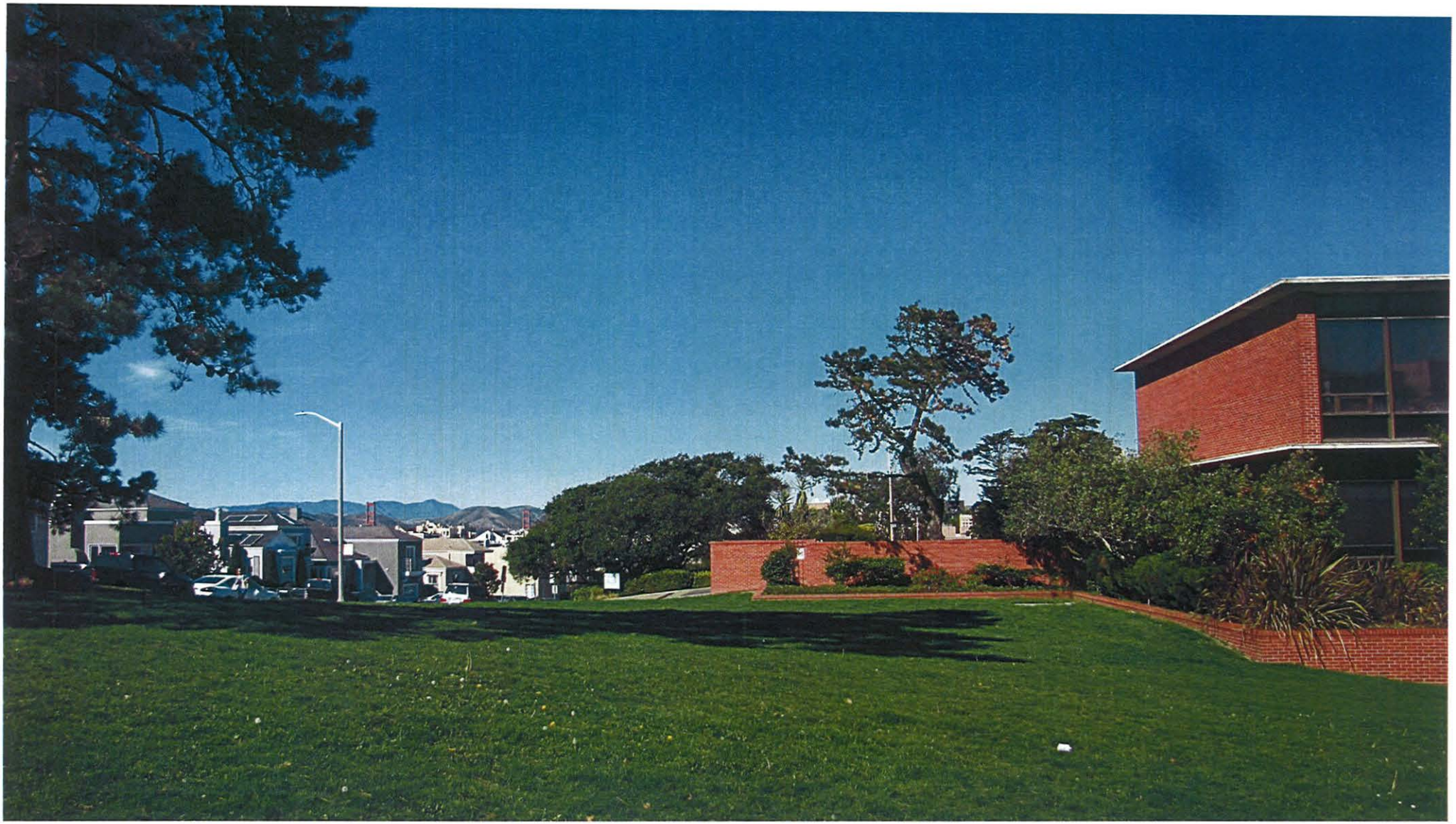
Laurel Heights Improvement Association Appeal of Planning Commission's Certification of Final EIR/ CEQA Findings

Board of Supervisors File No: 191035

Exhibits to Statement of Petree A. Powell, MCP, JD

EXHIBITS I - L

EXHIBIT I

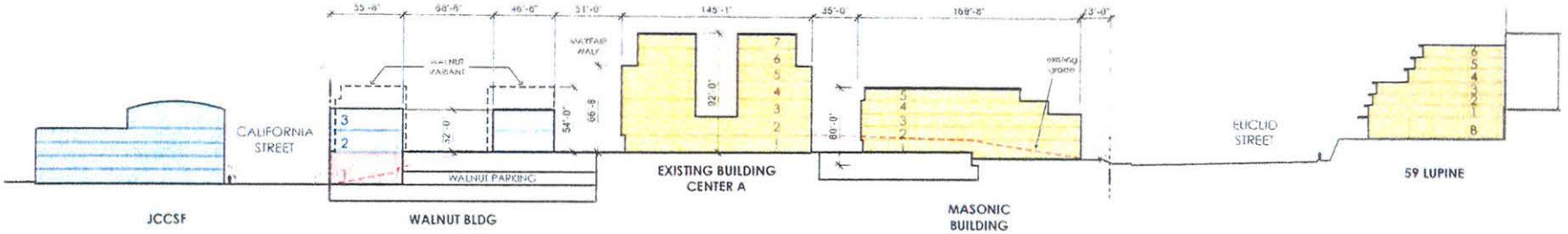



30

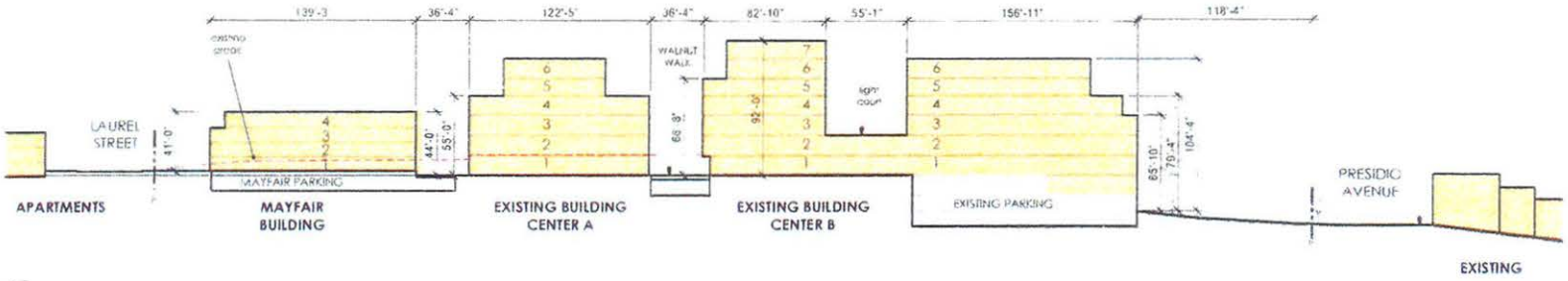

UCSF Permit
Parking
Public Fee
Parking In
Designated
Stalls Only


CAUTION

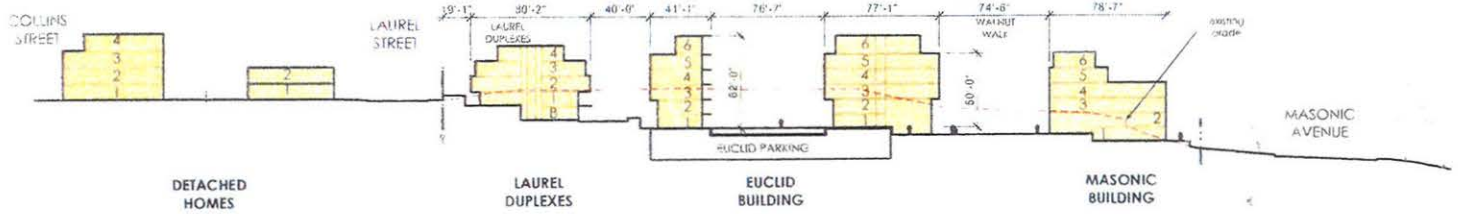
EXHIBIT J



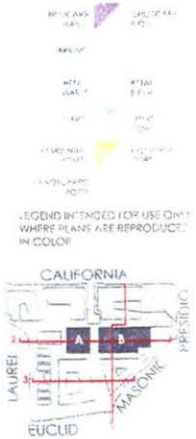
1 NORTH-SOUTH SITE SECTION



2 EAST-WEST SITE SECTION



3 EAST-WEST SITE SECTION



3333 CALIFORNIA STREET SAN FRANCISCO, CA

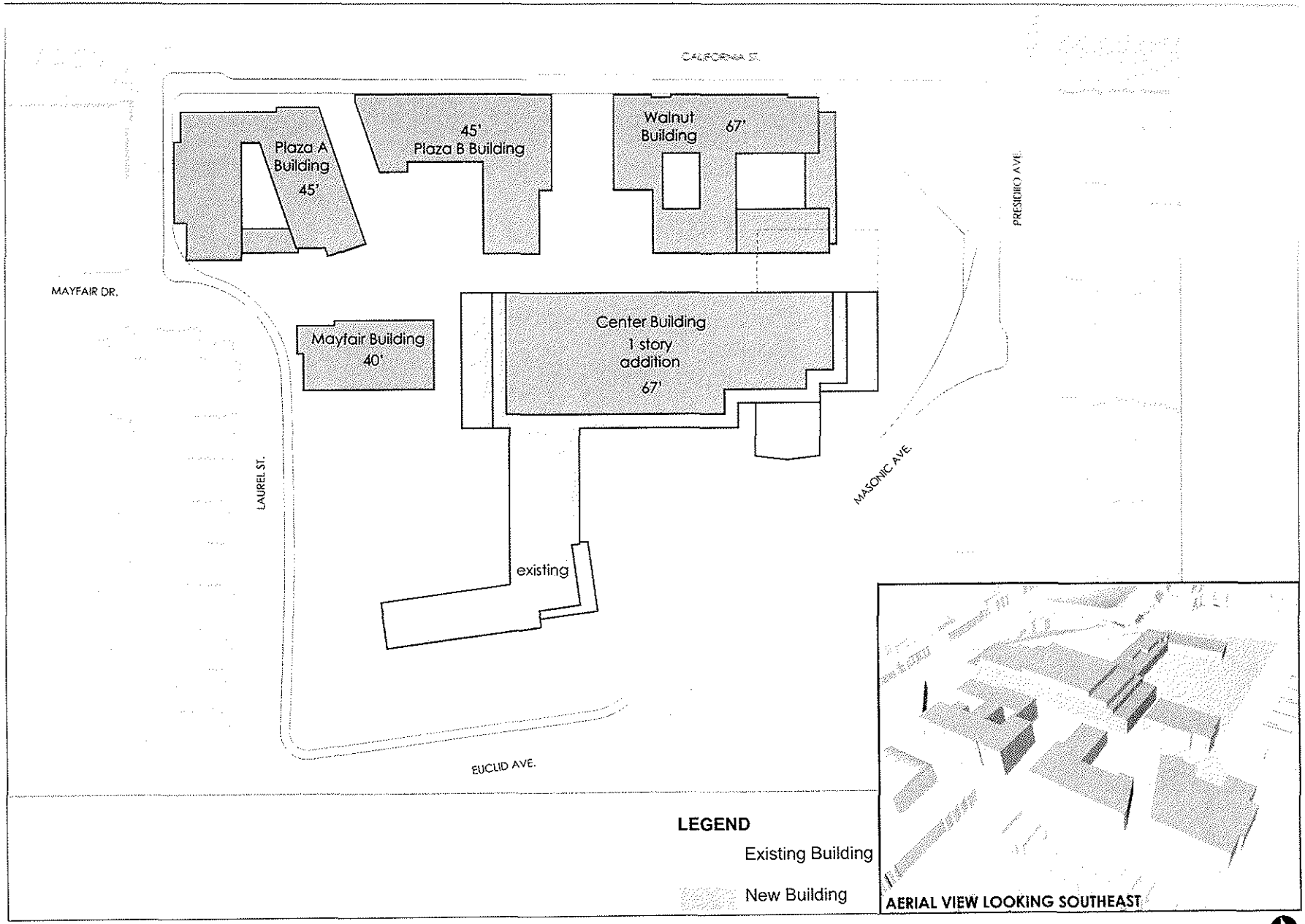
PROJECT SITE SECTIONS

PRADO GROUP | SIKIS | JAMES CORNER FIELD OPERATIONS | LSA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

G2.08

EXHIBIT K

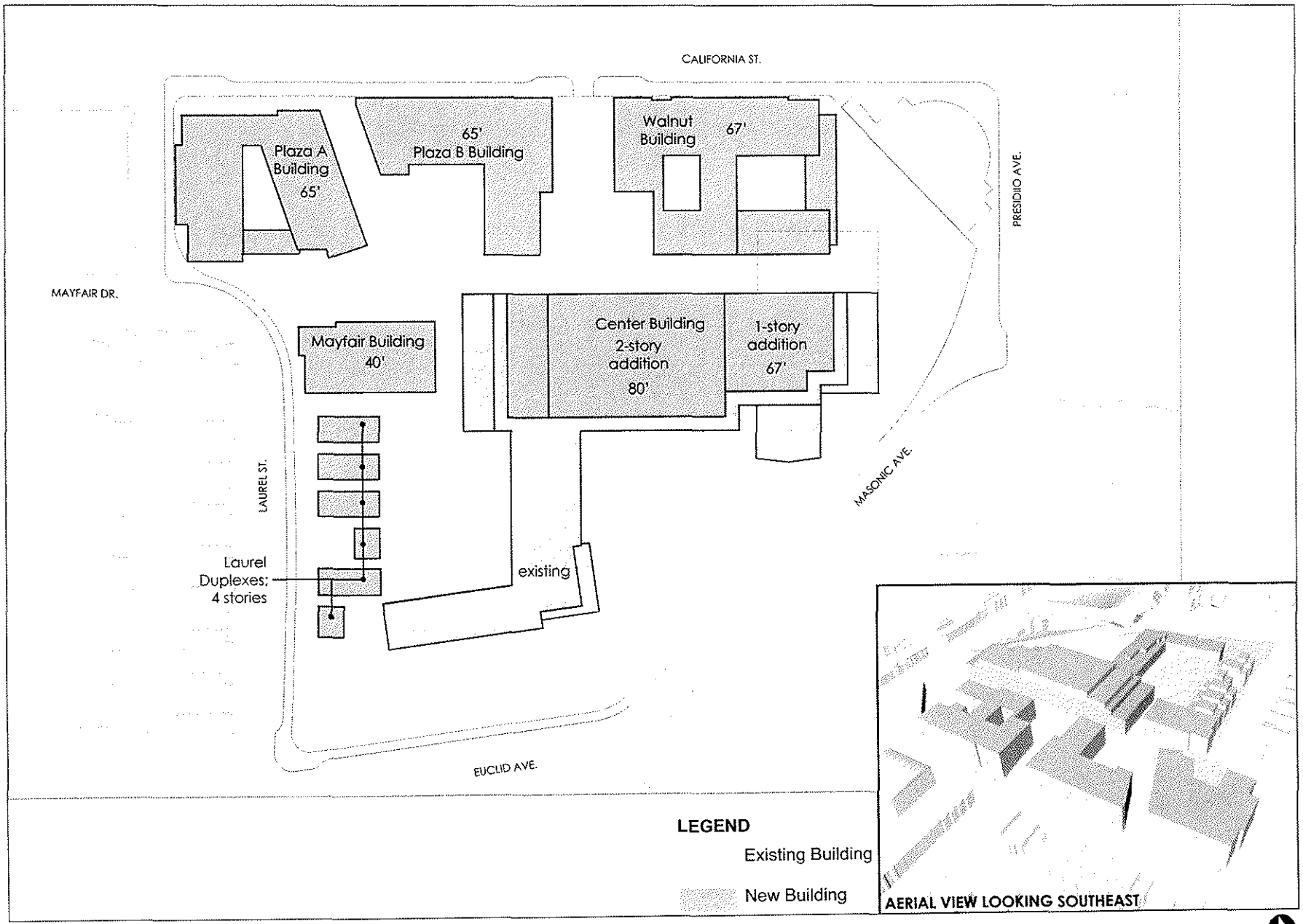


Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

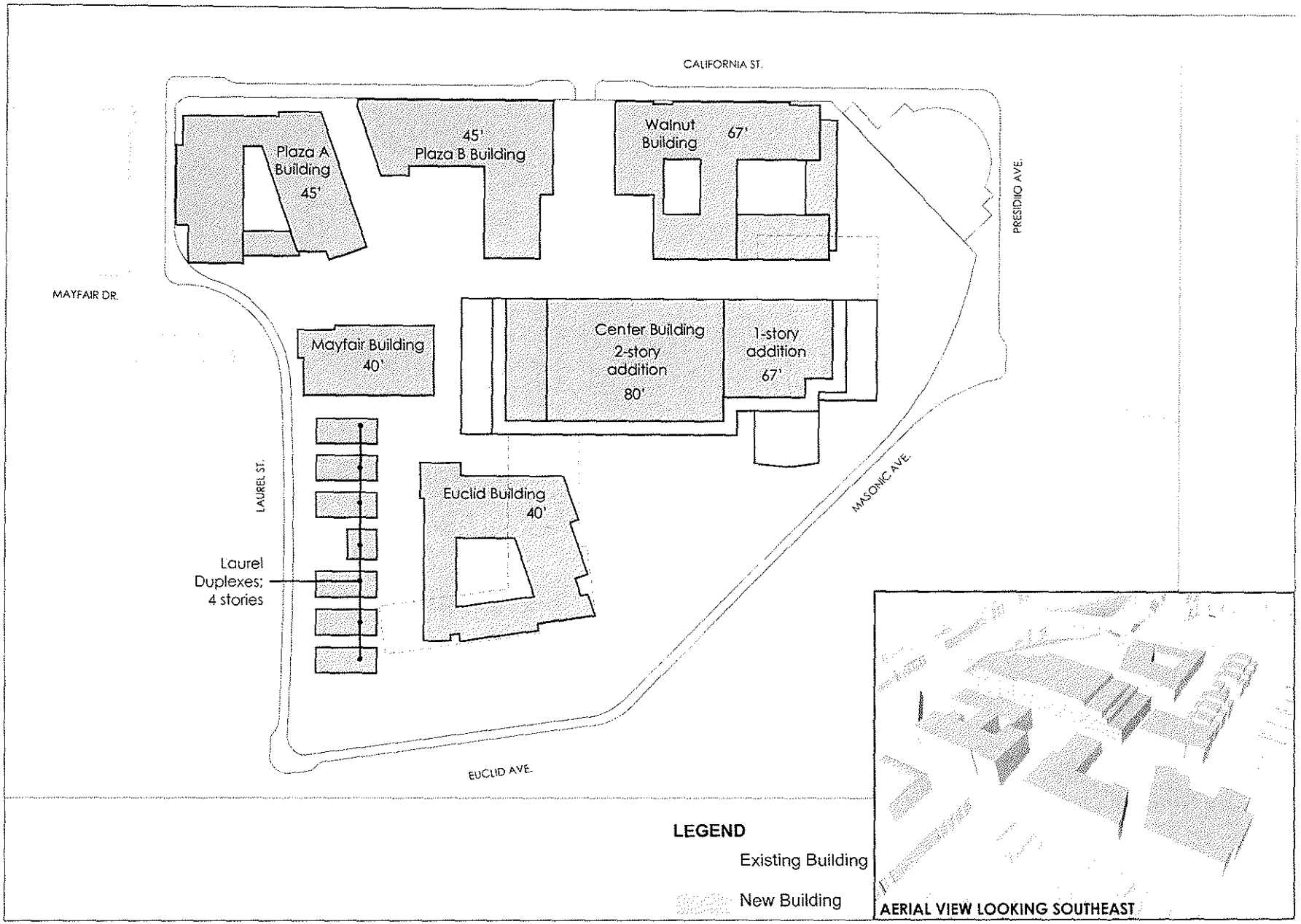
FIGURE 6.5: ALTERNATIVE C: FULL PRESERVATION - RESIDENTIAL ALTERNATIVE SITE PLAN



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT
2015-014028ENV

FIGURE 6.8: ALTERNATIVE D: PARTIAL PRESERVATION - OFFICE ALTERNATIVE SITE PLAN



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 6.11: ALTERNATIVE E: PARTIAL PRESERVATION - RESIDENTIAL ALTERNATIVE SITE PLAN

EXHIBIT L

SAN FRANCISCO
PLANNING DEPARTMENT

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San Francisco,
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DATE: 6/21/2016

TO: Brittany Bendix (Current Planning)

CC: **SF Public Works:** Simon Bertrang; Chris Buck; Brent Cohen; Lynn Fong; Kevin Jensen; Suzanne Levine; Kathy Liu; Michael Rieger; Kelli Rudnick; Rahul Shah;

SFMTA: Damon Curtis; Becca Homa; Charles Rivasplata; Mike Sallaberry; James Shahamiri; Dustin White;

SF Planning: Ben Caldwell; Tina Chang; Paul Chasan; Neil Hrushowy; Matthew Priest; Maia Small; Lana Russell; David Winslow;

SFPUC – Water: Jessica Arm; Josh Bardet ; Joan Ryan; Sam Young;

FROM: The Street Design Advisory Team (SDAT)

RE: **SDAT Review**
Case NO. 2015-014028PPA
Address: 3333 California Street
Neighborhood: Presidio Heights
Zoning: RM-1 (Neighborhood Mixed, Low Density)
Area Plan: None
Block/Lot: 1032/003

The Street Design Advisory Team (SDAT) provides design review and guidance to private developments working within the City's public right-of-way. SDAT is composed of representatives from the San Francisco Planning Department (SF Planning) Department of Public Works (SF Public Works), the San Francisco Municipal Transportation Agency (SFMTA), and the San Francisco Public Utilities Commission (SFPUC).

The 3333 California Street project came to SDAT on May 24, 2016. Below are the SDAT comments from that meeting.

CONTEXT

Project Description

The project entails the demolition of an existing annex building and surface parking lots, the reuse of an existing office building as residential with ground floor commercial uses, the construction of three 45 foot tall residential and retail mixed-use buildings, the construct a 30-45 foot tall office building, and the construction of two residential buildings ranging in height from 20-40 feet. The Proposal includes 558 residential dwelling units.

Better Streets Plan

The Better Streets Plan (BSP) adopted by the city in December 2010, provides a comprehensive set of guidelines for the design of San Francisco's pedestrian realm. The Plan seeks to balance the needs of all street users, with a

particular focus on the pedestrian environment and how streets can be used as public space. The BSP polices can be found at: www.sfbetterstreets.org.

- Under the BSP, California Street is classified as a Residential Throughway west of walnut and a Commercial Throughway east of Walnut. The project team should design all of their California frontage to Commercial Throughway standards due to the commercial nature of the proposed land uses west of Walnut Street. Both Residential and Commercial Throughways have a recommended sidewalk width of 15'.
- Under the BSP Presidio Ave is classified as a Neighborhood Commercial Street with a recommended sidewalk width of 15'.
- Under the BSP Masonic Ave is classified as a Residential Throughway with a recommended sidewalk width of 15'.
- Under the BSP Laurel Street and Euclid Ave are classified as a Neighborhood Residential streets with a recommended sidewalk width of 12'.

Citywide Bike Network

The 2009 San Francisco Bicycle Plan contains specific proposed near-term bicycle route network improvement projects for a safe, interconnected bicycle network that supports bicycling as an attractive alternative to private auto use. The San Francisco Bike Plan is the guiding policy document defining where bicycle improvements should be made in the City.

- Presidio Ave and Euclid Ave are designated city bike routes. Presidio Ave is currently marked with sharrows and Euclid Ave is currently marked with striped bike lanes.

SDAT DESIGN COMMENTS

Site design and pedestrian circulation

This large project demands a legible hierarchy of open spaces and circulation. At present, the proposal does not provide a clear hierarchy because pathways that appear primary peter off or are interrupted by buildings. The open space system could be made more legible.

SDAT requests a clear, primary east-west connection allows and encourages the public to traverse the site from Mayfair to the intersection of Presidio and Pine. The entirety of the path should be accessible to all users.

Other east-west circulation routes are not as crucial and could be made smaller or deemphasized in scale.

SDAT requests a single, clear, and primary north-south connection that both allows and encourages members of the public to traverse the site along the Walnut alignment, connecting to the intersection of Masonic and Euclid. This north/south pathway may meander through the site and doesn't need to be a straight axial pathway. Consider accomodating a portal through building A to support north-south public access. The entirety of the pathway should be accessible to all users. The major N-S should be clearly legible. Greater emphasis should be placed on the Euclid Masonic corner as it is the primary destination on the southern half of the project site.

Sidewalks should span driveways on Walnut Street. Driveways on Walnut should have curb aprons as opposed to the curb returns shown, allowing for a contiguous public sidewalk into the site.

SDAT supports bulbouts at the intersection of Walnut and California, however these should extend into both the Walnut and California right-of-ways (instead of soely the California ROW as shown in the PPA plan set). Bulbouts on Walnut Street should be compliant with the Better Streets Plan and should extend a minimum of 5' beyond the property line before the curb return begins. SDAT supports the generous bulbouts on California Ave and encourages the design team to consider how understory plantings, seating, special paving, public art or similar elements can program these large bulbouts and act as a gateway into the project site.

Masonic Ave

Consider large canopy trees along the Masonic frontage that match the scale of the trees across the street from the project site. This block of Masonic carries high vehicle flows. The street configuration is unlikely to substantively change in the near term. A cohesive tree canopy can have an ameliorative traffic calming effect on the street.

SDAT supports the concept of regulating the Masonic/Euclid intersection by building a corner plaza and reducing the curb radius at Euclid and Masonic.

Mayfair Drive & Laurel Street Intersection

The Laurel Street has an excessively wide corer radius in the northbound direction at the Mayfair Drive intersection. The project sponsor should reduce the corer radius by squaring off the intersection at this location, creating a 3-way stop at this location. This will result in a corner plaza similar to the one proposed at Masonic and Euclid, which would act as a gateway to the central open space proposed at the NE corner of the site.

Euclid Ave

Consider a double row of trees in a park edge condition along Euclid, to define the park and bikeway. Design Euclid in the Better Streets Plan "Park Edge Street" typology.

Consider a protected bike facility on Euclid adjacent to the park.

STANDARD SDAT COMMENTS

Street Trees, Understory Plantings and Better Streets Plan

All landscaping, street trees, site furniture, and special paving should be consistent with guidelines in the Better Streets Plan (BSP). See www.sfbetterstreets.org.

STATEMENT OF KATHRYN DEVINCENZI

I have been in the 3333 California Street building many times, including for community meetings, events and review of public records.

There is an existing north-south passageway on the ground-floor of the building that extends from the Conference Center entrance on the north side of the building to the south side of the existing building. This passageway exits on the lower portion of the Terrace. From that exit point, a pathway meanders upward and connects with the upper level of the Terrace, from which a person can exit through gates to Masonic Avenue. On many occasions, I have observed that there gates have been open during working hours. The narrative accompanying Photo 9 to UCSF employee Lanyon's statement is inaccurate insofar as it states that the gate is "kept locked." Included in Exhibit L is a photograph which I have taken showing that this gate was open on November 4, 2019 during business hours. On many prior occasions, I have found this gate to be open during business hours and when employees are working in the building.

The internal passageway also connects with an internal elevator, which a person can take to the floor above and follow internal corridors to exit on the upper portion of the Terrace, adjacent to the café.

The April 8, 2019 memorandum about campus access by UCSF employee Bruce Lanyon acknowledges that this passageway exists and describes it as "a ground-floor building access point through secured doors that connects the northeast parking lot on the north side of the existing building to a south facing lower patio area on the south side of the existing building." Mr. Lanyon claims that this "circulation from north to south is through the interior of the existing building and is not open or accessible to the public or pedestrians without a UCSF access card." While UCSF may now be locking the entrance doors, I have found them open in the past and have entered or exited through these doors during various visits to the site.

Mr. Lanyon's statement also ambiguously claims that access through the property from Euclid or Masonic Avenues is restricted by a "lockable gate" but does not claim that the gate is locked during business hours.

Mr. Lanyon failed to mention the existing internal pathway through the site when he concluded that pedestrians "cannot walk through the site from north to south or west to east to access adjacent streets due to the siting of the existing building." Mr. Lanyon's statement appears to indicate that a person must walk through the building to traverse the site from north to south. Also, his statement is ambiguously phrased and appears to pertain only to an external west-east or north-south pathway through the middle of the site. The existing internal pathway described above is to the east of the building center and allows persons to walk through the building from north to south if the pathway is open to the public.

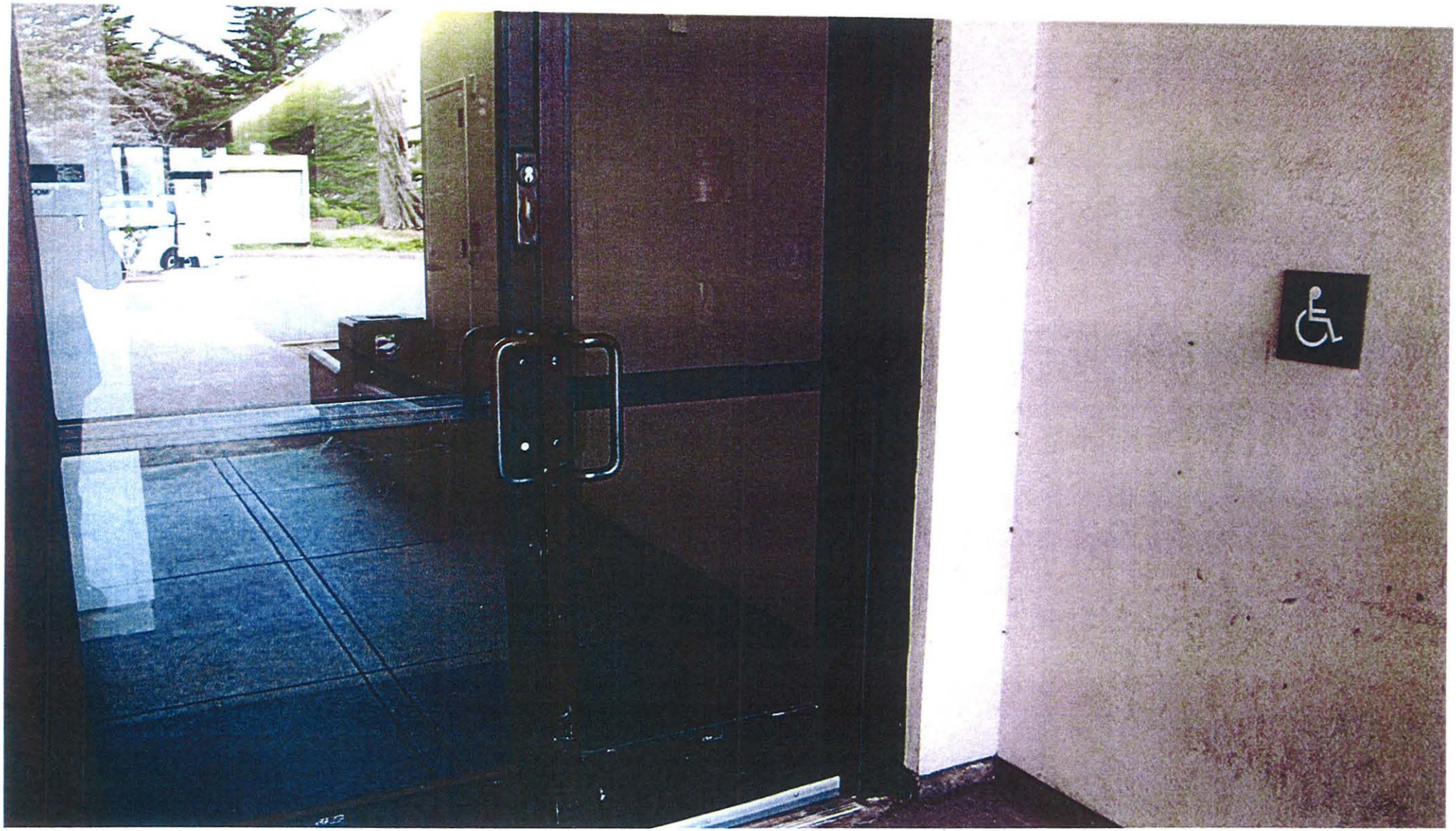
Mr. Lanyon also omitted other pathways that are open to the public during business hours

and most of the time. There is a pathway from the northern gate that leads through the property and is open virtually all of the time. From this gate, I have walked through the site and exited through the western gate at Laurel Street near Mayfair. People as well as vehicles commonly enter through theses gates and cut through the property from north to west or from west to north. The western gate has been open during business hours but closed at night. Also, a walker can meander through the site and follow internal pathways up to the Executive Wing of the building and exit through the upper gate at Laurel Street.

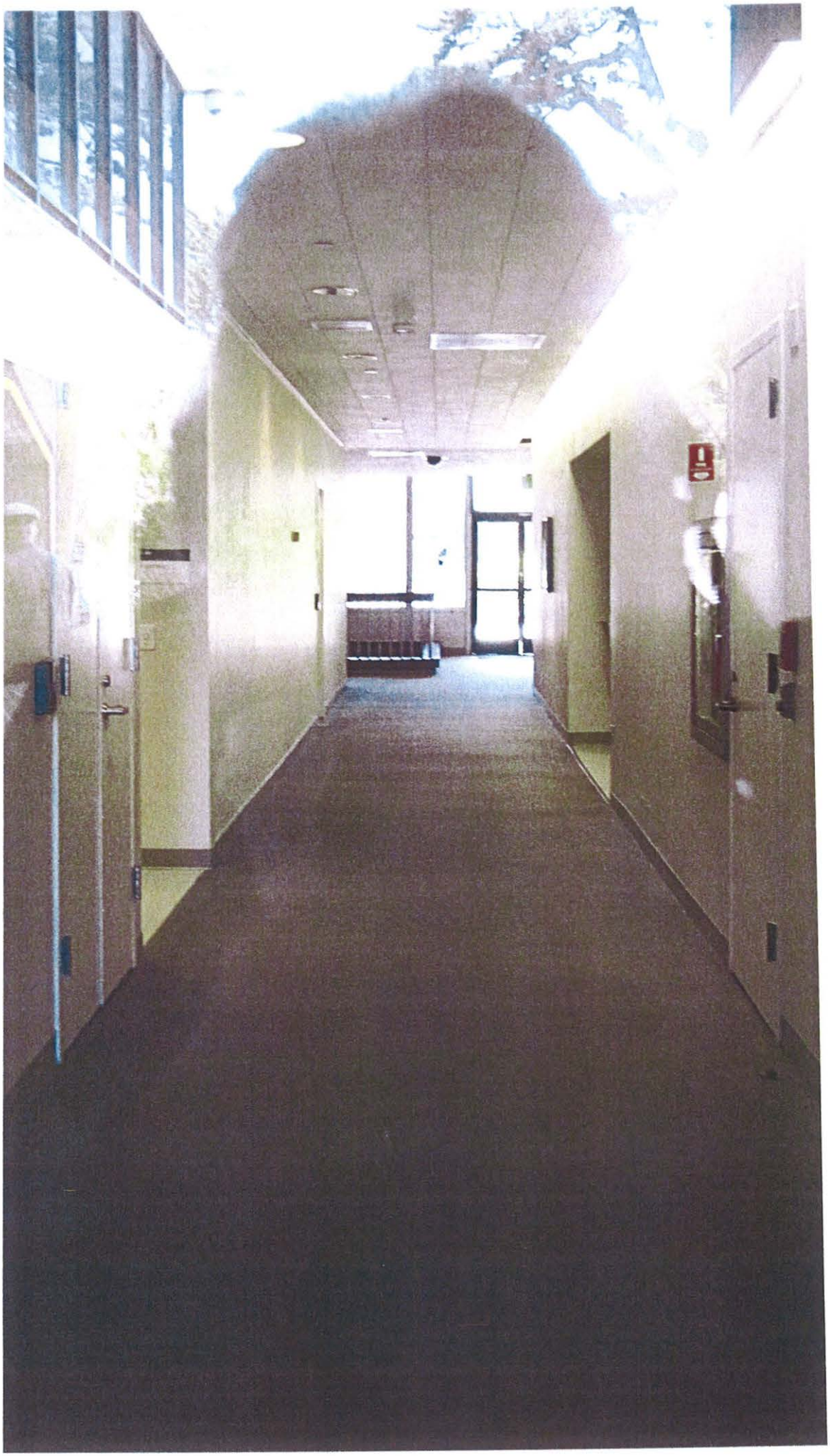
DATED: November 4, 2019

Kathryn R. Devincenzi

Kathryn R. Devincenzi




Conference Center



UCSF

University of California
San Francisco

UCSF Real Estate

UCSF Box 0287
654 Minnesota Street, 2nd Floor
San Francisco, CA 94143

April 8, 2019

San Francisco City Planning Department
Kei Zushi, Senior Planner
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: UCSF Laurel Heights Campus Access
3333 California Street, San Francisco, CA 94118

Dear Mr. Zushi:

We have been asked to provide some information related to the property at 3333 California Street, which UCSF sold in 2018 but continues to occupy under a lease.

The UCSF Laurel Heights campus at 3333 California Street is a restricted access campus with strict security control measures in place that allow only authorized UCSF faculty and/or employees unaccompanied access to the building. Any non-UCSF access is allowed only with permission of UCSF.

The UCSF employees at the Laurel Heights Campus are issued a building security access card that allows them to access the building and property. Any non-UCSF visitor is required to enter the building through the main entrance where they must show their driver's license or other identification to the security guard, sign into a log book, and state their business and/or reason for accessing the property in addition to the name of the UCSF employee they are visiting. On the rare occasions that public/community meetings are held at the site with permission of UCSF, the sign-in requirement is still in place and a university employee must remain on-site during that period.

There is a ground-floor building access point through secured doors that connects the northeast parking lot on the north side of the existing building to a south facing lower patio area on the south side of the existing building. This circulation from north to south is through the interior of the existing building and is not open or accessible to the public or pedestrians without a UCSF access card (Photos: 4, 5, 6 & 7). Access through the property from Euclid or Masonic Avenues is restricted by a lockable gate (Photo 9) and passing through this secure gate would be the only way to access the exterior Upper Terrace (Photo 10) from the streets to the south. Pedestrians cannot walk through the site from north to south or west to east to access adjacent streets due to the siting of the existing building.

There is currently a Bright Horizons preschool that is a sub-lessee of UCSF and currently operates at the Laurel Heights Campus. The center hours are 6:30am - 6:00pm and parents are able to drop off/pick up their child at any point during operational hours. Parents must bring their children to their classroom through a secured entry, connect

with their teachers for the hand-off, and sign their children in/out on an online tracking system. Parents receive an e-mail each time their child is signed in and out of the center. Parents are given a temporary parking pass (20 minutes) for the parking lot off Laurel Street and are required to obtain a UCSF building badge to enter the building *and* a key fob for Bright Horizon's main entry door. The building badge is obtained through UCSF and Bright Horizons is responsible for tracking the key fobs.

There is also a café that is a sub-tenant of UCSF that is solely for the use of UCSF employees/invitees and is not open to the public. Access to the cafe is either through the interior of the building or off the Upper Terrace using a UCSF issued security access card.

There is a green space at the corner of Laurel Street and Euclid Avenue; however, this area is private property and any use by the public requires UCSF's permission to pass and is currently posted with private property/permission to pass signage.

Please feel free to reach out to me with any additional questions or clarifications at bruce.lanyon@ucsf.edu.

Sincerely,

DocuSigned by:
Bruce Lanyon
0402839309984FC...

Bruce Lanyon
Interim Assistant Vice Chancellor
UCSF Real Estate

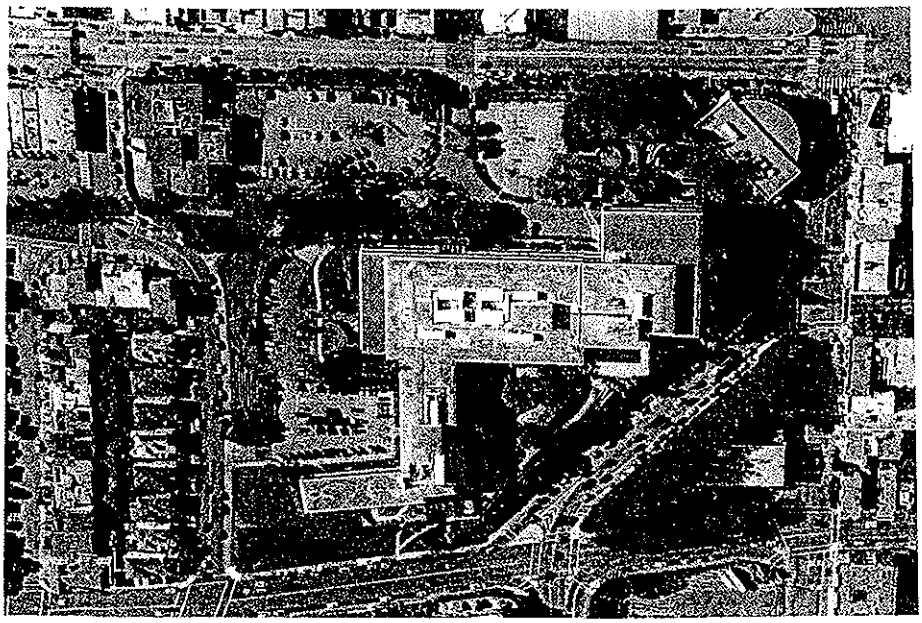


Photo 1: UCSF Laurel Heights Campus at 3333 California Street

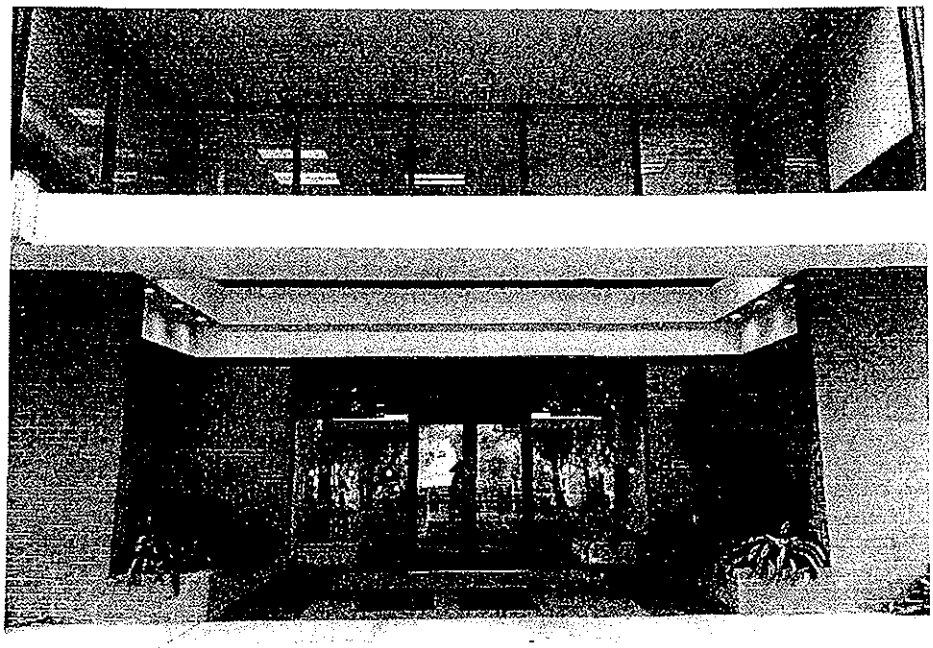


Photo 2: Main Entrance at 3333 California where visitors are required to sign in with the security guard

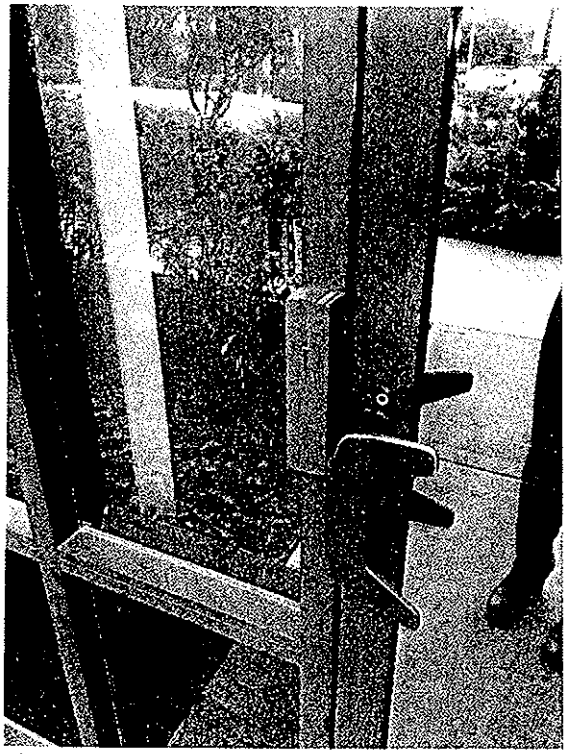


Photo 3: All exterior doors are not open to the public and require a UCSF issued security access card to gain entry.

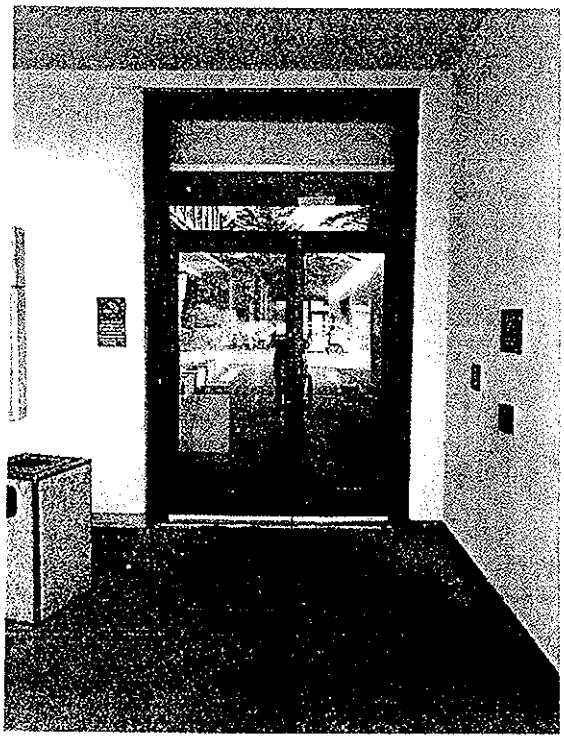


Photo 4: Door from northeast side of the parking lot that leads through the building interior and opens through another secure door into an exterior southeast facing patio area.

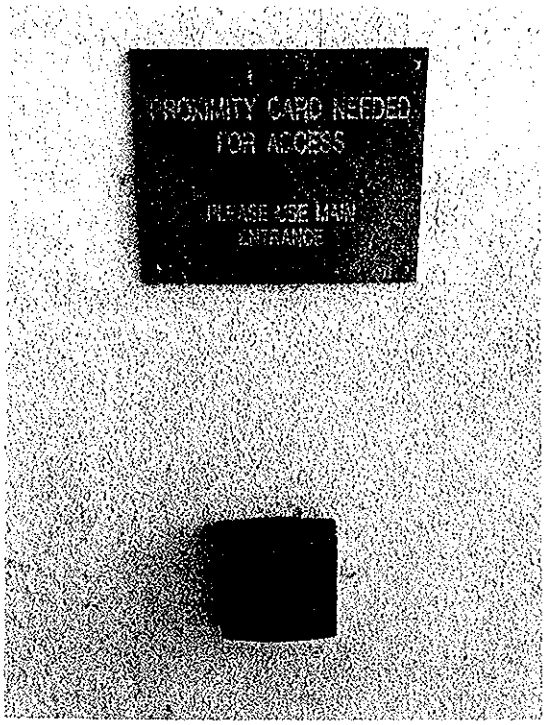


Photo 5: Site Security Sign and access card reader at the door off the northeast side of the parking lot.

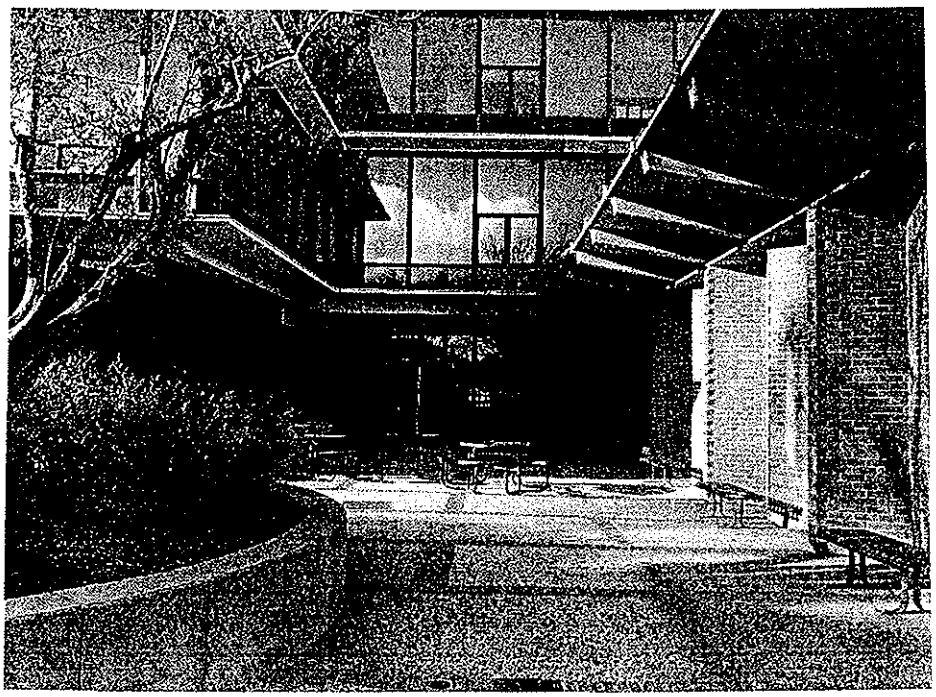


Photo 6: South facing exterior patio area

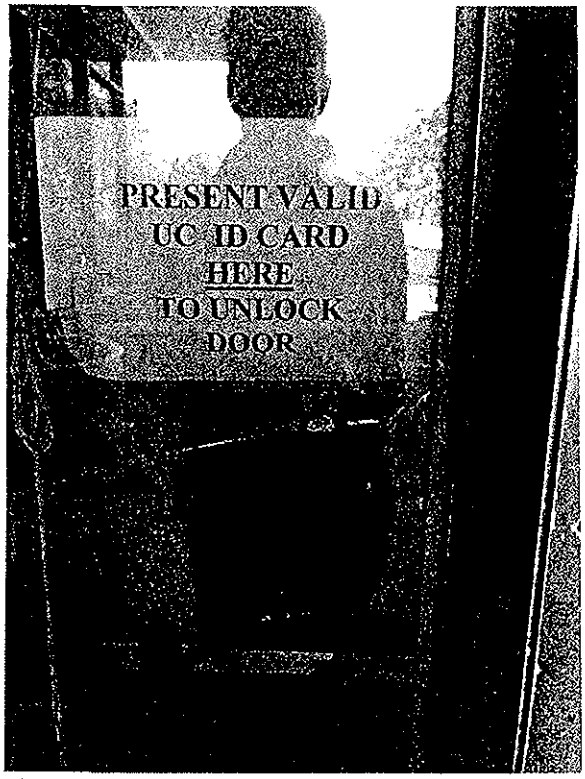


Photo 7: Restricted keycard access sign at the door off the south facing patio.

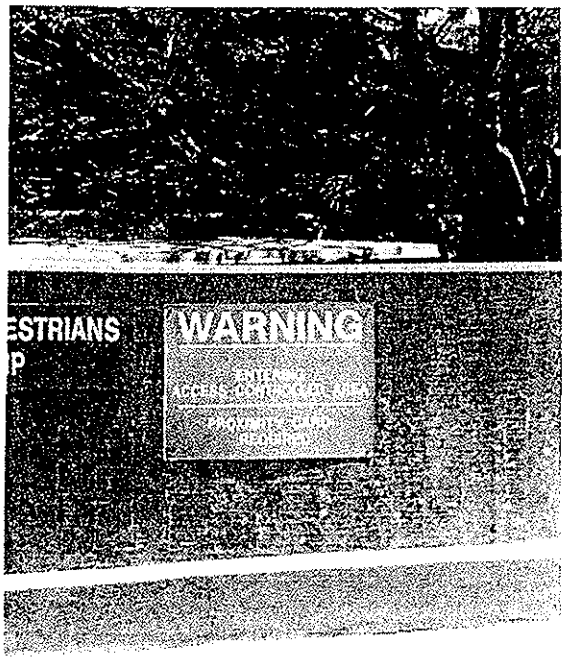


Photo 8: UCSF Laurel Heights Campus is an "Access Controlled Area" Sign

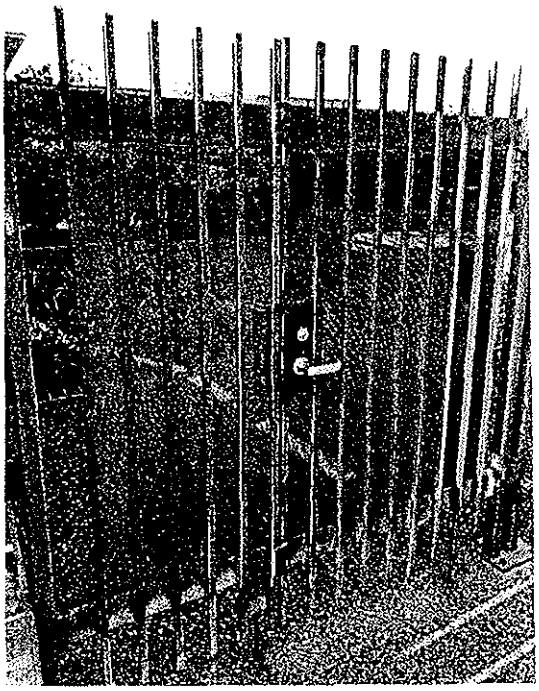


Photo 9: Access from Euclid and Masonic Avenues is restricted by a secured gate which is kept locked and requires a key to open. The gate is the access to the Upper Terrace.

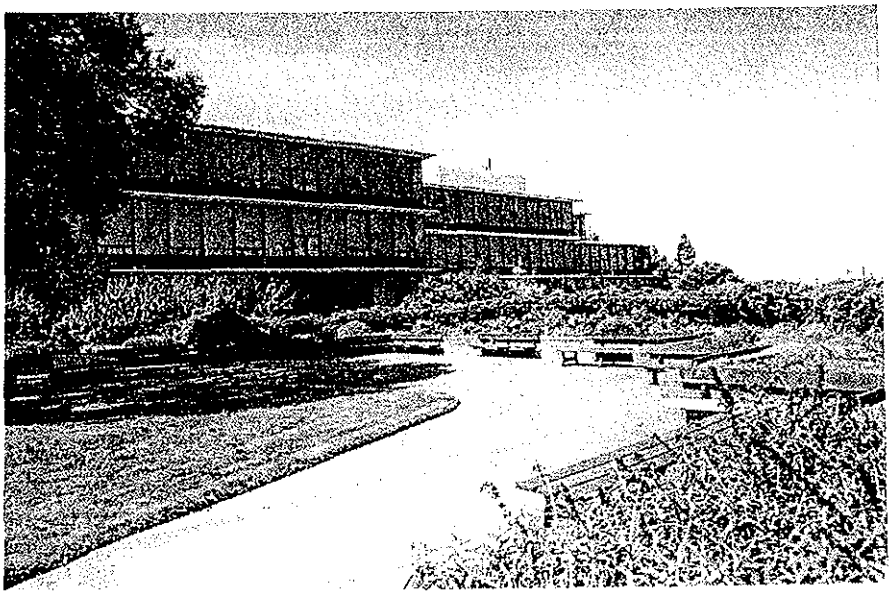


Photo 10: Upper Terrace at 3333 California Street

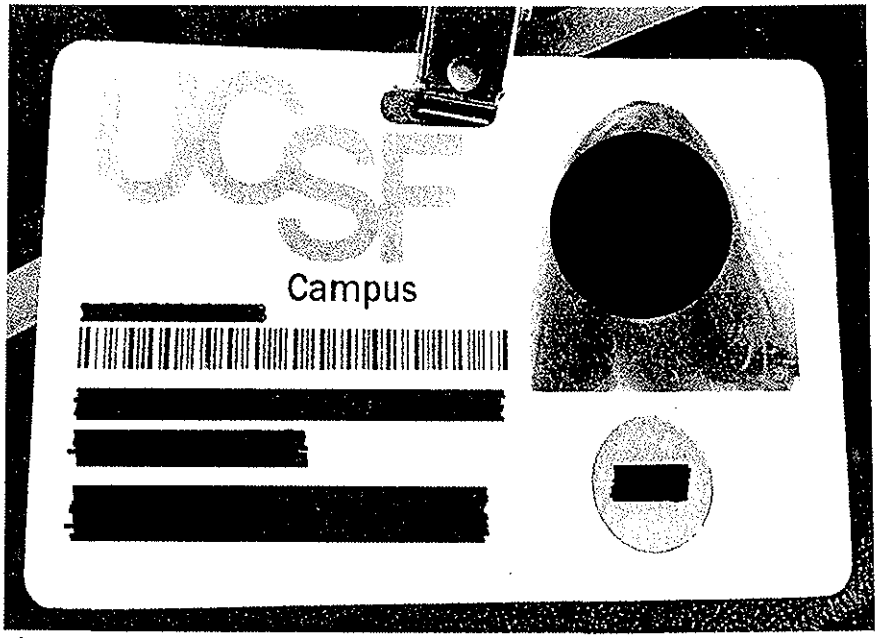


Photo 11: UCSF Security Access Badge

Re: 3333 California Street, San Francisco, CA
Record Number: 2015-014028ENV/CUA/PCA/MAP/DVA

Laurel Heights Improvement Association Appeal of Planning Commission's Certification of Final EIR/ CEQA Findings

Board of Supervisors File No: 191035

Exhibits to Statement of Petree A. Powell, MCP, JD

EXHIBITS M - P

EXHIBIT M

TREANORHL

August 20, 2019

3333 California Street
San Francisco, California

Preservation Alternative – Feasibility Evaluations

The Laurel Heights Improvement Association asked TreanorHL to assist in further developing their Preservation Alternative and Community Variant for 3333 California Street in San Francisco. Additionally, the organization wished us to verify that the Preservation Alternative and Community Variant are feasible by confirming the possible number of units per building and the approximate size of the various units.

Existing Plan Review

1. TreanorHL reviewed the existing building drawings on file for 3333 California Street at the Records Department of the San Francisco Building Department.
   - The review of the plans indicated the light courts in the Preservation Alternative and Community Variant should be relocated to facilitate the retention of the existing stairwells and elevator banks.

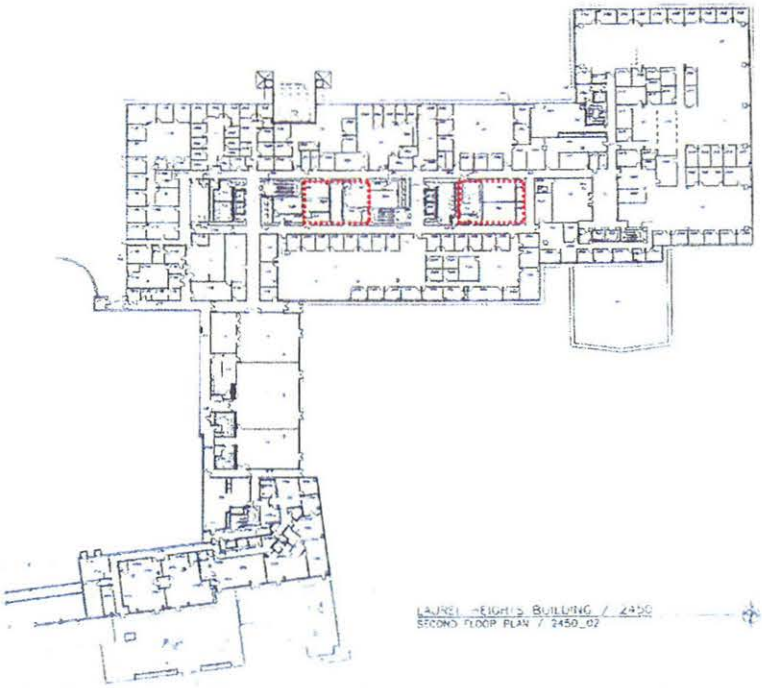


Figure 1. The red dashed boxes identify proposed location of light courts in the Preservation Alternative and Community Variant.

- Reviewing the existing drawings confirmed that the structural columns are fairly regular throughout the main building and wing. Adapting the spaces for residential use can easily be done without impacting the existing column grid.
- The existing column grid in the main part of the building has a 30-foot spacing. The proposed project calls for creating a 40-foot passthrough all the way up the existing building in the north south direction. This proposed 40-foot wide passthrough in the existing building would be expensive as it does not align with the existing grid. Maintaining the 30-foot grid in the proposed passthrough would require less structural modification to the existing building.
- The building was likely designed to accommodate the current structure, not additional stories. So, increasing the height of the building by adding additional floors will require significant effort to upgrade the existing structure.[1]

2. The Preservation Alternative and Community Variant retain the southern wing of the existing structure. The existing wing has a more irregular structural column grid than the main part of the building. However, adapting the wing space for residential use will not be any more challenging than in any other part of the structure.
   - Exiting was not reviewed, but if additional exiting is needed there are ample opportunities for an additional stair in the wing.
   - Accessibility would be provided, as in the rest of the building, by means of elevators and other features that meet the California Accessibility code.
   - If water damage is present in the wing it can be remediated and corrected.

FEASIBILITY EVALUATIONS

1. The attached analysis shows that the Preservation Alternative scheme and the Community Variant are feasible in terms of providing equivalent residential units to that of the proposed project. To do this, TreanorHL compared the gross square footage with a reasonable net square footage for the proposed building type, and then calculated how many units of various sizes (studio, one and two bedrooms, etc.) could reasonably fit into the net square footage.
   - The California Street buildings (both front and back) were calculated using the high end and low end of the efficiency factor for residential construction. This did not change the number of units per building, but it did affect the size of the units within the structures.
   - Both the Preservation Alternative scheme and the Community Variant provide units that are comparable in size and type to those identified in the proposed project.

[1] Merrill, Fred H. "Fireman's Fund Insurance Company - 3333 California Street." Received by Mr. D. L. Devincenzi, 7 Feb. 1964.

CALIFORNIA - FRONT (BASE)

Floor Plate Area:	30,000 SF	
Number of Floors:	4 Floors	
Total Gross SF:	120,000 SF	
Efficiency Factor:	0.75	0.85
Total NSF:	90,000 SF	102,000 SF
Full Preservation Unit # Total:	56	56
Average Unit SF:	1,607 SF	1,821 SF

CALIFORNIA - BACK (BASE)

Floor Plate Area:	19,293 SF	
Number of Floors:	4	
Total Gross SF:	77,172 SF	
Efficiency Factor:	0.75	0.85
Total NSF:	57,879 SF	65,596 SF
Full Preservation Unit # Total:	52	52
Average Unit SF:	1,113 SF	1,261 SF

MAYFAIR BUILDING (BASE)

Floor Plate Area:	13,500 SF	
Number of Floors:	4 Floors	
Total Gross SF:	54,000 SF	
Efficiency Factor:	0.75	
Total NSF:	40,500 NSF	
Full Preservation Unit # Total:	40	
Average Unit SF:	1,013 NSF	

WALNUT BUILDING - PORTICO RETAINED (BASE)

Floor Plate Area:	31,825 SF	
Number of Floors:	4 Floors	
Total Gross SF:	127,300 SF	
Efficiency Factor:	0.75	
Total NSF:	95,475 NSF	
Full Preservation Unit # Total:	118	
Average Unit SF:	809 NSF	

HISTORIC MAIN BUILDING - PORTICO RETAINED (BASE)

Floor Plate Area:	SF	
Number of Floors:	Floors	
Total Gross SF:	362,300 SF	drawings A6.00
Efficiency Factor:	0.70	
Total NSF:	253,610 NSF	
Full Preservation Unit # Total:	292	
Average Unit SF:	869 NSF	

BASE

Proposed Project Unit Count		Preservation Alternative Unit Count	
Junior	27	Junior	27
1-Bed	207	1-Bed	207
2-Bed	194	2-Bed	194
3-Bed	103	3-Bed	103
4-Bed	27	4-Bed	27
Total	558	Total	558

CALIFORNIA - FRONT (VARIANT)

Floor Plate Area:	30,000 SF	
Number of Floors:	4 Floors	
Total Gross SF:	120,000 SF	
Efficiency Factor:	0.75	0.85
Total NSF:	90,000 SF	102,000 SF
Community Variant Unit # Total:	64	64
Average Unit SF:	1,406 SF	1,594 SF

CALIFORNIA - BACK (VARIANT)

Floor Plate Area:	19,293 SF	
Number of Floors:	4	
Total Gross SF:	77,172 SF	
Efficiency Factor:	0.75	0.85
Total NSF:	57,879 SF	65,596 SF
Community Variant Unit # Total:	60	60
Average Unit SF:	965 SF	1,093 SF

MAYFAIR BUILDING (VARIANT)

Floor Plate Area:	13,500 SF	
Number of Floors:	4 Floors	
Total Gross SF:	54,000 SF	
Efficiency Factor:	0.75	
Total NSF:	40,500 NSF	
Community Variant Unit # Total:	52	
Average Unit SF:	779 NSF	

WALNUT BUILDING - PORTICO RETAINED (VARIANT)

Floor Plate Area:	31,825 SF	
Number of Floors:	7 Floors	
Total Gross SF:	222,775 SF	
Efficiency Factor:	0.75	
Total NSF:	167,081 NSF	
Community Variant Unit # Total:	228	
Average Unit SF:	733 NSF	

HISTORIC MAIN BUILDING - PORTICO RETAINED (VARIANT)

Floor Plate Area:	SF	
Number of Floors:	Floors	
Total Gross SF:	362,300 SF	
Efficiency Factor:	0.70	
Total NSF:	253,610 NSF	
Community Variant Unit # Total:	340	
Average Unit SF:	746 NSF	

VARIANT

Proposed Project Unit Count		Preservation Alternative Unit Count	
Junior	27	Junior	27
1-Bed	392	1-Bed	392
2-Bed	195	2-Bed	195
3-Bed	103	3-Bed	103
4-Bed	27	4-Bed	27
Total	744	Total	744

Full Preservation Unit Breakdown (.75)

Total NSF: 90,000
Total # Units: 56

	SF	Units	Total
Junior			
1-Bed			
2-Bed	896	7	6,272
3-Bed	1,410	22	31,020
4-Bed	1,955	27	52,785
TOTAL		56	90,077

Community Variant Unit Breakdown (.75)

Total NSF: 90,000
Total # Units: 64

	SF	Units	Total
Junior			
1-Bed			
2-Bed	896	14	12,544
3-Bed	1,410	37	52,170
4-Bed	2,000	13	26,000
TOTAL		64	90,714

Full Preservation Unit Breakdown (.85)

Total NSF: 102,000
Total # Units: 56

	SF	Units	Total
Junior			
1-Bed			
2-Bed	1,100	7	7,700
3-Bed	1,550	22	34,100
4-Bed	2,200	27	59,400
TOTAL		56	101,200

Community Variant Unit Breakdown (.85)

Total NSF: 102,000
Total # Units: 64

	SF	Units	Total
Junior			0
1-Bed			
2-Bed	1,150	14	16,100
3-Bed	1,550	37	57,350
4-Bed	2,200	13	28,600
TOTAL		64	102,050

Full Preservation Unit Breakdown (.75)

Total NSF: 57,879
Total # Units: 52

	SF	Units	Total
Junior			
1-Bed	600	8	4,800
2-Bed	896	20	17,920
3-Bed	1,450	24	34,800
4-Bed			
TOTAL		52	57,520

Community Variant Unit Breakdown (.75)

Total NSF: 57,879
Total # Units: 60

	SF	Units	Total
Junior			
1-Bed	600	22	13,200
2-Bed	896	15	13,440
3-Bed	1,410	16	22,560
4-Bed	2,000	7	14,000
TOTAL		60	63,200

Full Preservation Unit Breakdown (.85)

Total NSF: 65,596
Total # Units: 52

	SF	Units	Total
Junior			
1-Bed	700	8	5,600
2-Bed	1,000	20	20,000
3-Bed	1,650	24	39,600
4-Bed			
TOTAL		52	65,200

Community Variant Unit Breakdown (.85)

Total NSF: 65,596
Total # Units: 60

	SF	Units	Total
Junior			
1-Bed	625	22	13,750
2-Bed	925	15	13,875
3-Bed	1,500	16	24,000
4-Bed	2,000	7	14,000
TOTAL		60	65,625

Full Preservation Unit Breakdown

Total NSF: 40,500
Total # Units: 40

	SF	Units	Total
Junior			
1-Bed	800	10	8,000
2-Bed	1,100	30	33,000
3-Bed			
4-Bed			
TOTAL		40	41,000

Community Variant Unit Breakdown

Total NSF: 40,500
Total # Units: 52

	SF	Units	Total
Junior			
1-Bed	600	23	13,800
2-Bed	900	27	24,300
3-Bed	1,400	2	2,800
4-Bed			
TOTAL		52	40,900

Full Preservation Unit Breakdown

Total NSF: 95,475
Total # Units: 118

	SF	Units	Total
Junior	525	17	8,925
1-Bed	600	44	26,400
2-Bed	900	40	36,000
3-Bed	1,450	17	24,650
4-Bed			
TOTAL		118	95,975

Community Variant Unit Breakdown

Total NSF: 167,081
Total # Units: 228

	SF	Units	Total
Junior	525	17	8,925
1-Bed	600	143	85,800
2-Bed	900	47	42,300
3-Bed	1,300	14	18,200
4-Bed	1,800	7	12,600
TOTAL		228	167,825

Full Preservation Unit Breakdown

Total NSF: 253,610
Total # Units: 292

	SF	Units	Total
Junior	550	10	5,500
1-Bed	650	145	94,250
2-Bed	1,000	97	97,000
3-Bed	1,410	40	56,400
4-Bed			
TOTAL		292	253,150

Community Variant Unit Breakdown

Total NSF: 253,610
Total # Units: 340

	SF	Units	Total
Junior	510	10	5,100
1-Bed	600	204	122,400
2-Bed	900	92	82,800
3-Bed	1,275	34	43,350
4-Bed			0
TOTAL		340	253,650

Exhibit D

Encl. Rec'd Meeting 2/4/64

FIREMAN'S FUND INSURANCE COMPANY

3333 CALIFORNIA STREET
SAN FRANCISCO, CALIFORNIA

FRED H. MERRILL
PRESIDENT

February 7, 1964

Mr. D. L. Devincenzi
President
Laurel Heights Improvement Association
of San Francisco
San Francisco, California

Dear Mr. Devincenzi:

The purpose of this letter is to provide you with a convenient means of conveying to members of the Laurel Heights Improvement Association an account of the substance of my comments to you and Dr. Greenspan at our meeting held here on Tuesday, February 4, concerning the presently proposed Fireman's Fund building addition and our thinking with respect to possible future expansion of our building.

I believe the following adequately summarizes our discussion:

There was general agreement among the three of us that the presently proposed addition to our building was in compliance with all of the stipulations in effect with respect to the Fireman's Fund property.

You indicated that, despite the fact that there are no height limitations for commercial development in effect with respect to the property, the association membership was extremely interested in learning whether our future plans encompassed the addition of another floor to the present building, and would appreciate advice from us in this connection.

I assured you that we do not have plans for an additional floor on the building and that the proposed addition will have a permanent roof rather than a slab suitable as flooring for a further addition. This was for the reason that we have been advised that existing foundations would not be adequate for an additional floor and that in my view an additional floor would not only be detrimental to the appearance of the building but impracticable from a building cost standpoint. While it was not my intention or function, I pointed out, either to alter the stipulations with respect to the property,

Encl Plenum mem 1/7/64

accepted by the San Francisco Planning Commission, or to purport to bind the management of Fireman's Fund, I assured you that during my tenure as President of Fireman's Fund, for the reasons given above, I would not consider the construction of a floor on our building above the presently proposed addition.

I then went on to explain that any expansion of our building beyond that which we have reviewed with the Planning Commission and members of your association would be preceded by appropriate research and development relating to provision for adequate off-street parking facilities. It is our intention, I said, to utilize, ultimately, the present roof area for additional space, but before this done, we would plan to develop more service and parking facilities - most probably on the Presidio and California areas of our property.

I was very pleased to learn that the Association plans to record its approval of our proposed addition and to convey this fact to the Planning Commission. This action is most gratifying to me and to our management. We shall do everything in our power to minimize all inconveniences during the construction period.

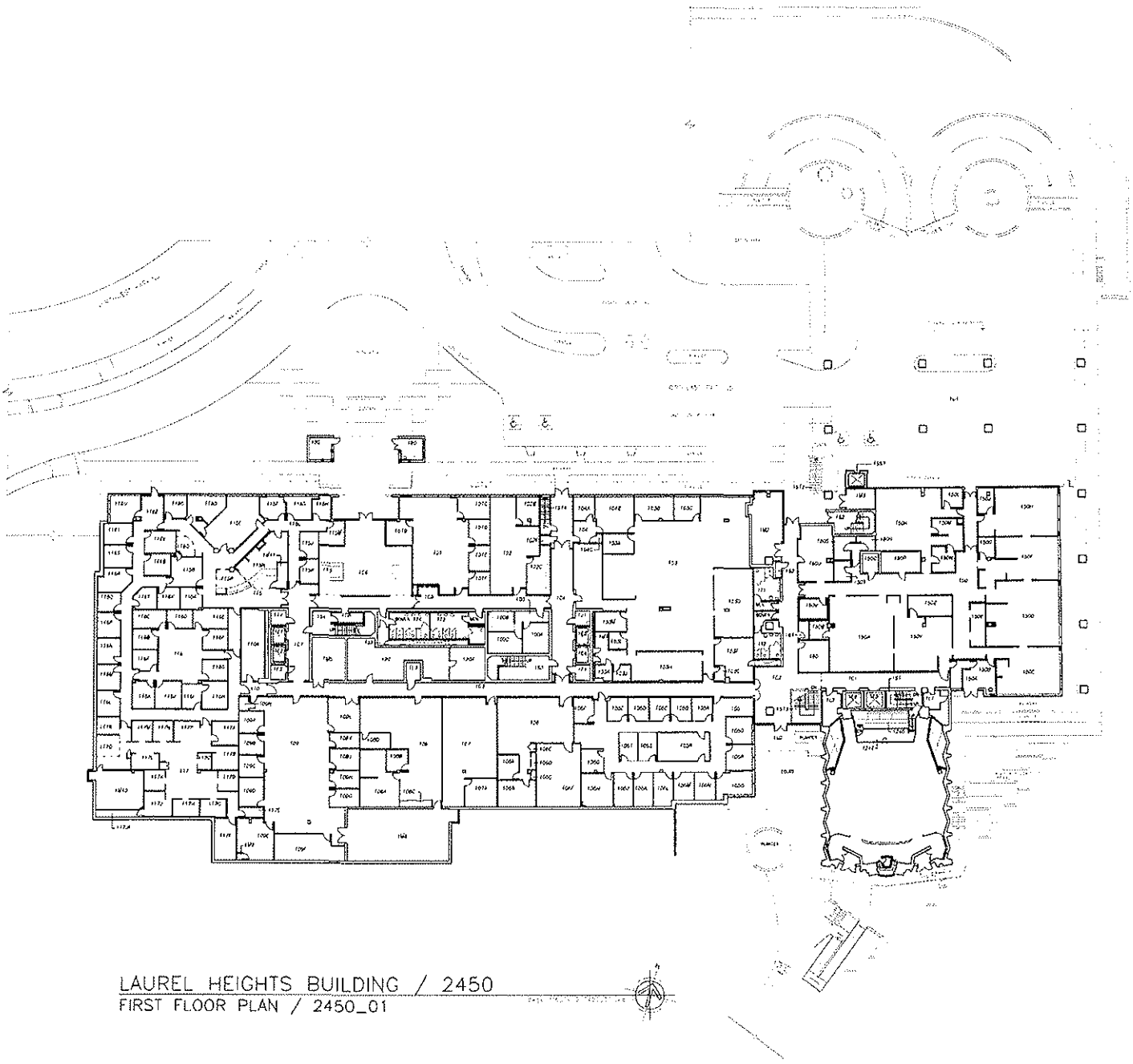
Meanwhile, please be assured that we shall always attempt to maintain the Fireman's Fund building in such a manner that it - as indicated yesterday in the press - will continue to be an asset to our neighborhood.

Sincerely yours,

Fred H. Merrill

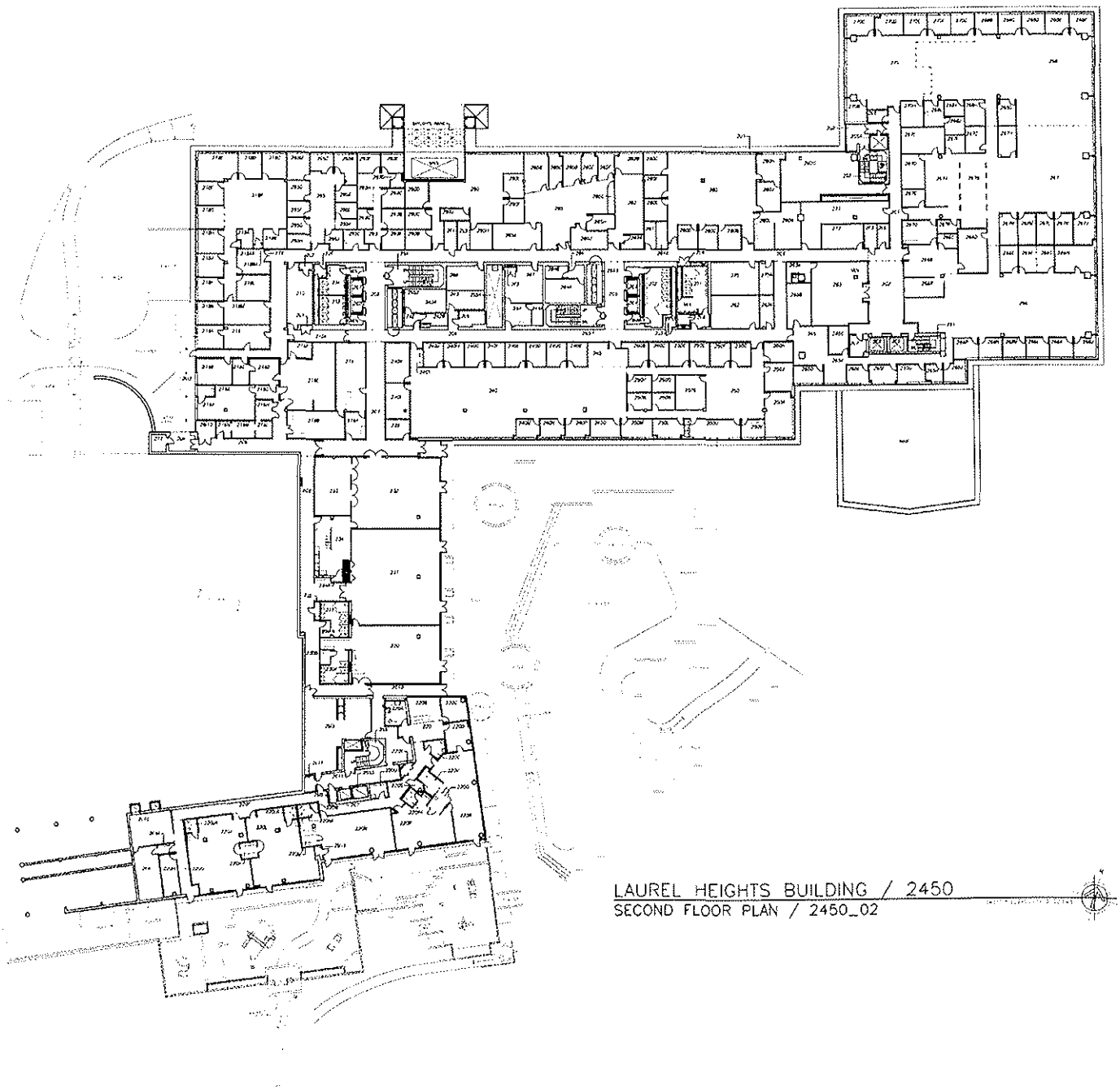
Fred H. Merrill
President

EXHIBIT N

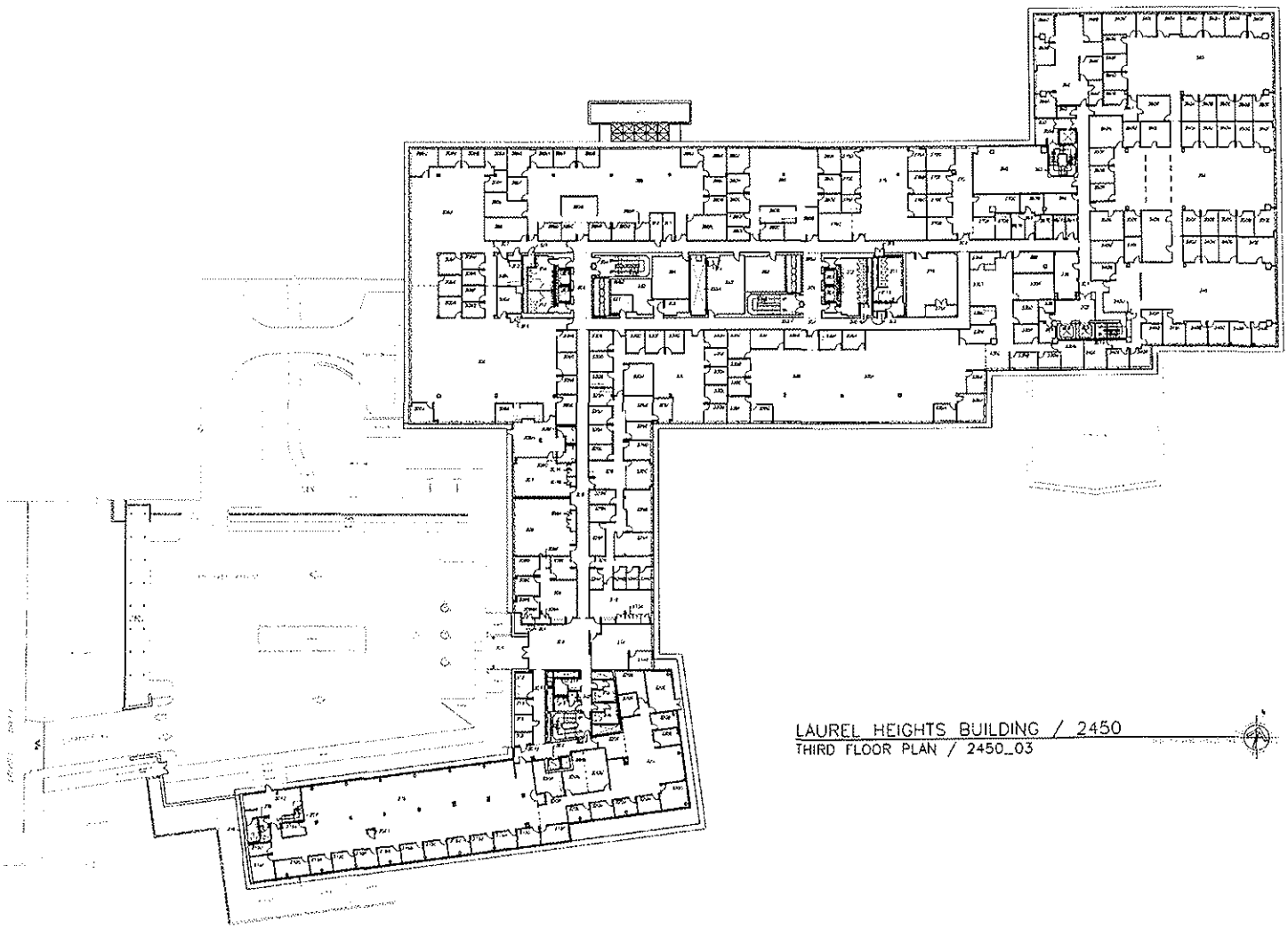


LAUREL HEIGHTS BUILDING / 2450

FIRST FLOOR PLAN / 2450_01

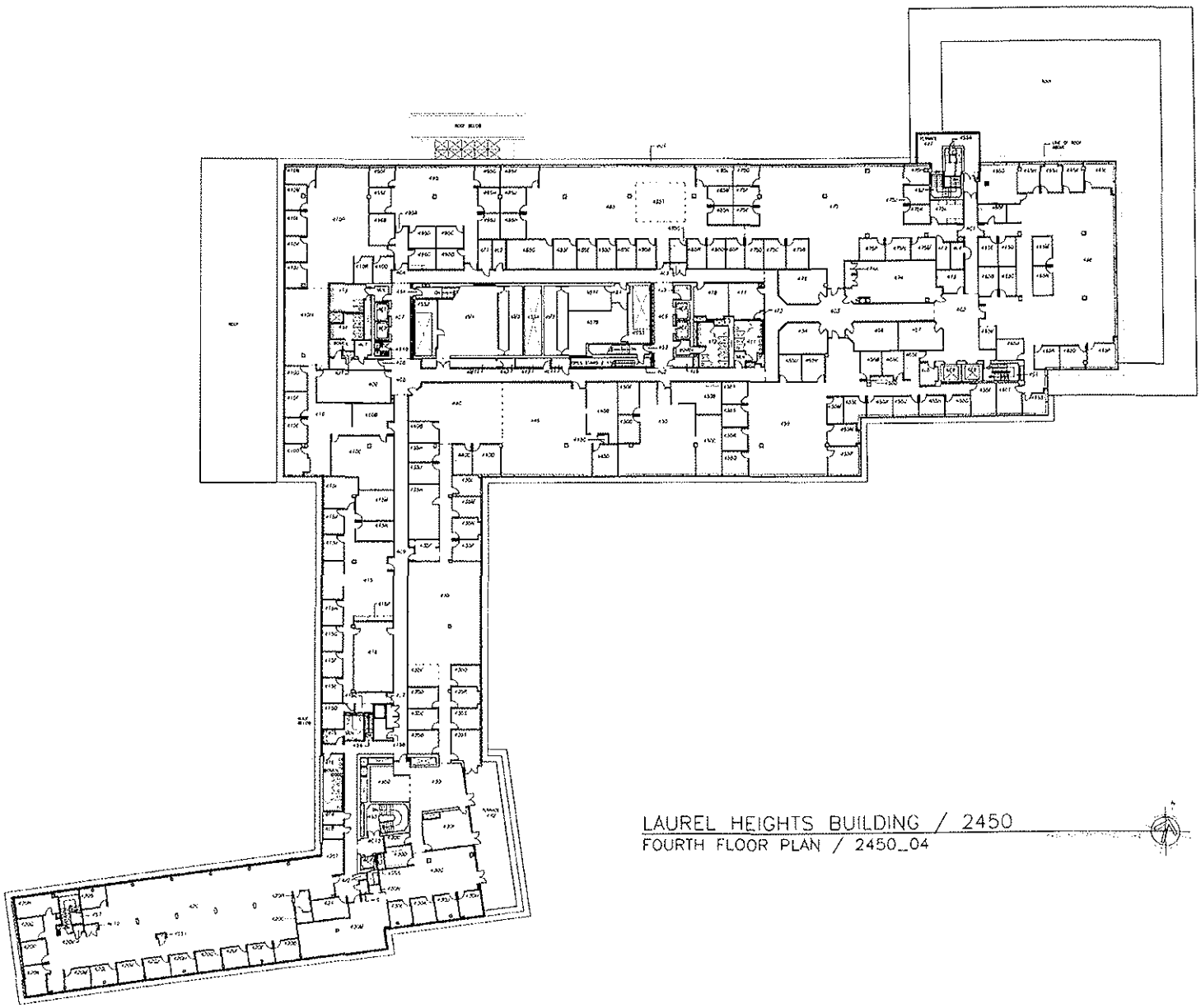


LAUREL HEIGHTS BUILDING / 2450
SECOND FLOOR PLAN / 2450_02



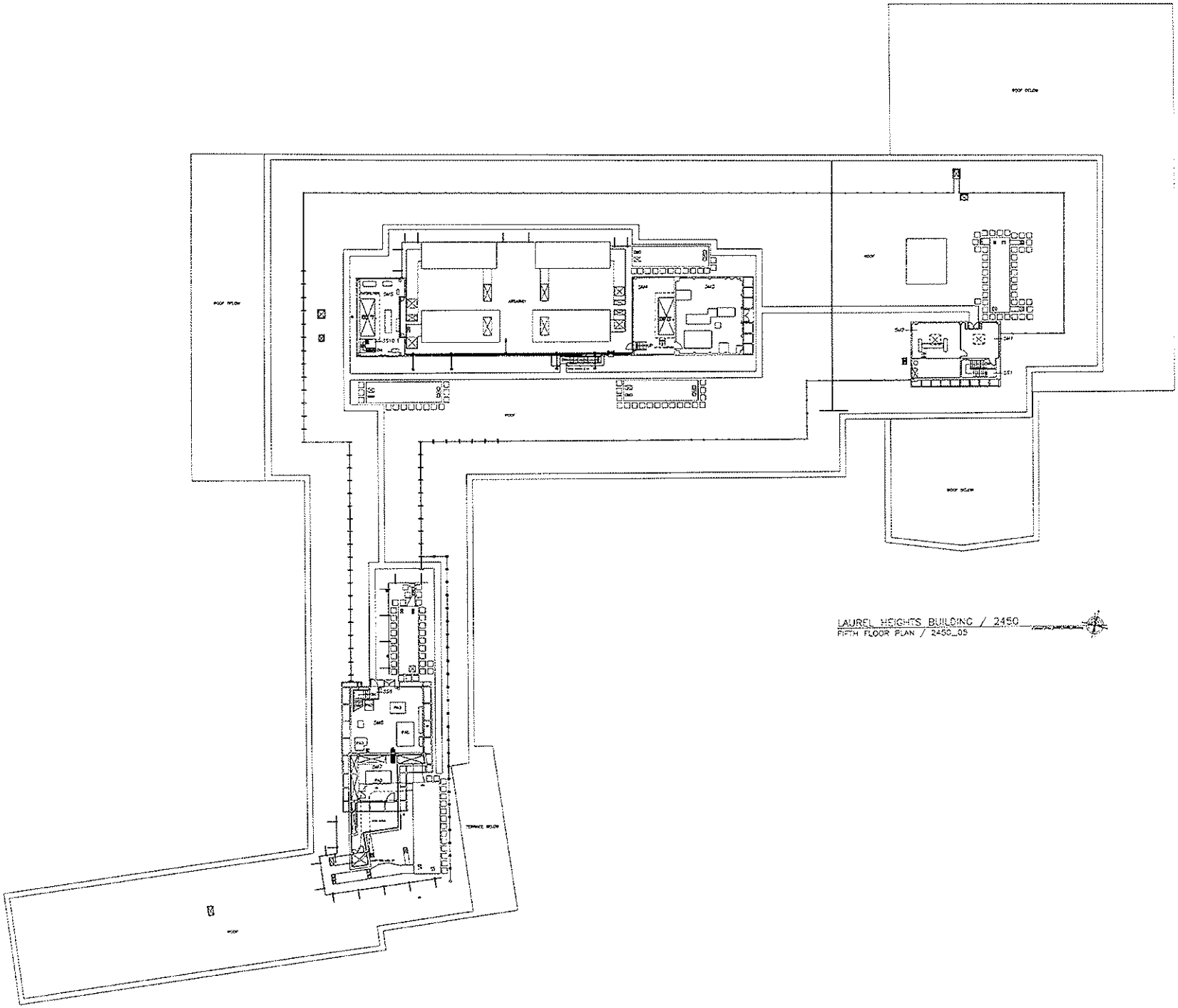
LAUREL HEIGHTS BUILDING / 2450

THIRD FLOOR PLAN / 2450_03

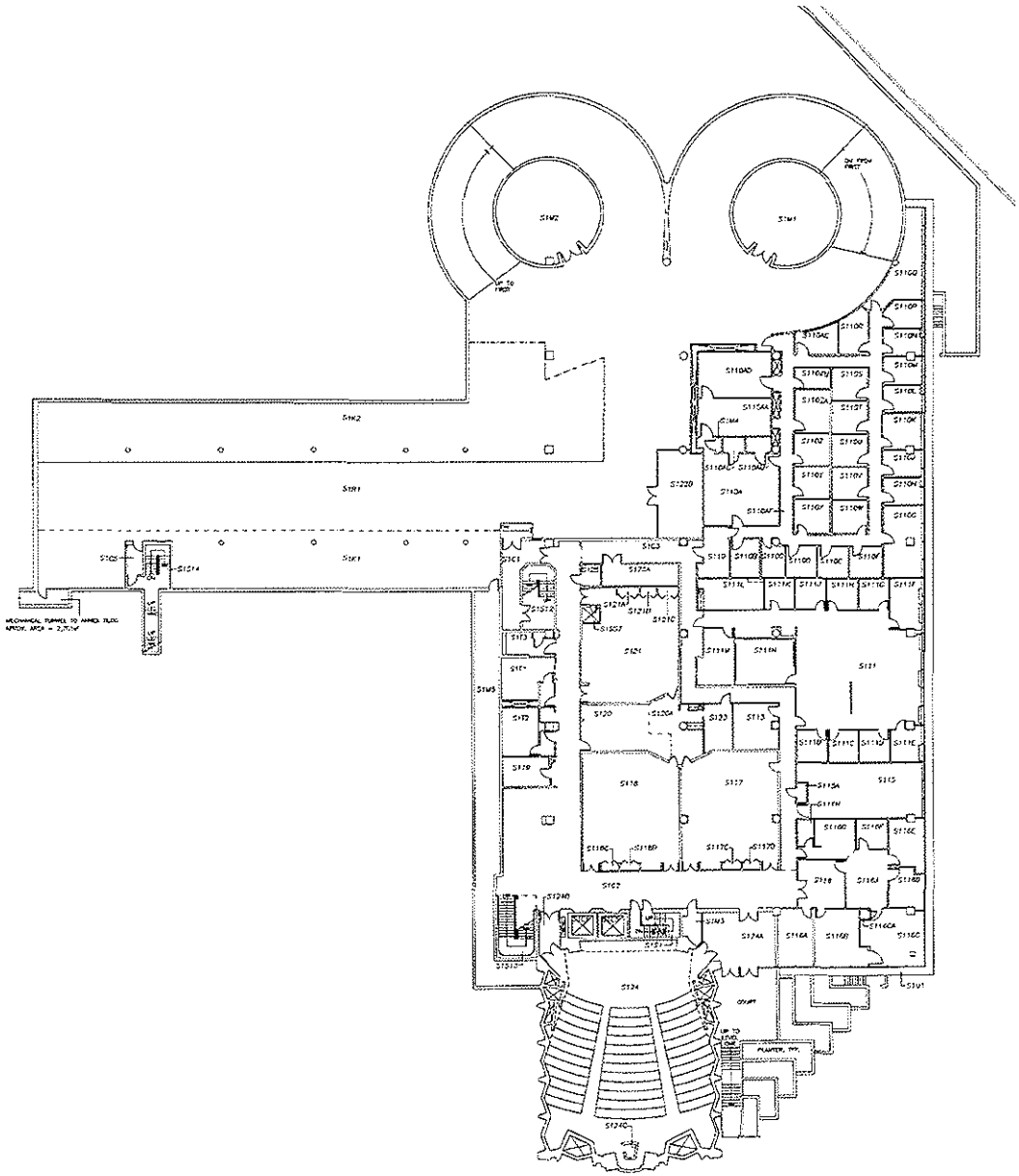


LAUREL HEIGHTS BUILDING / 2450

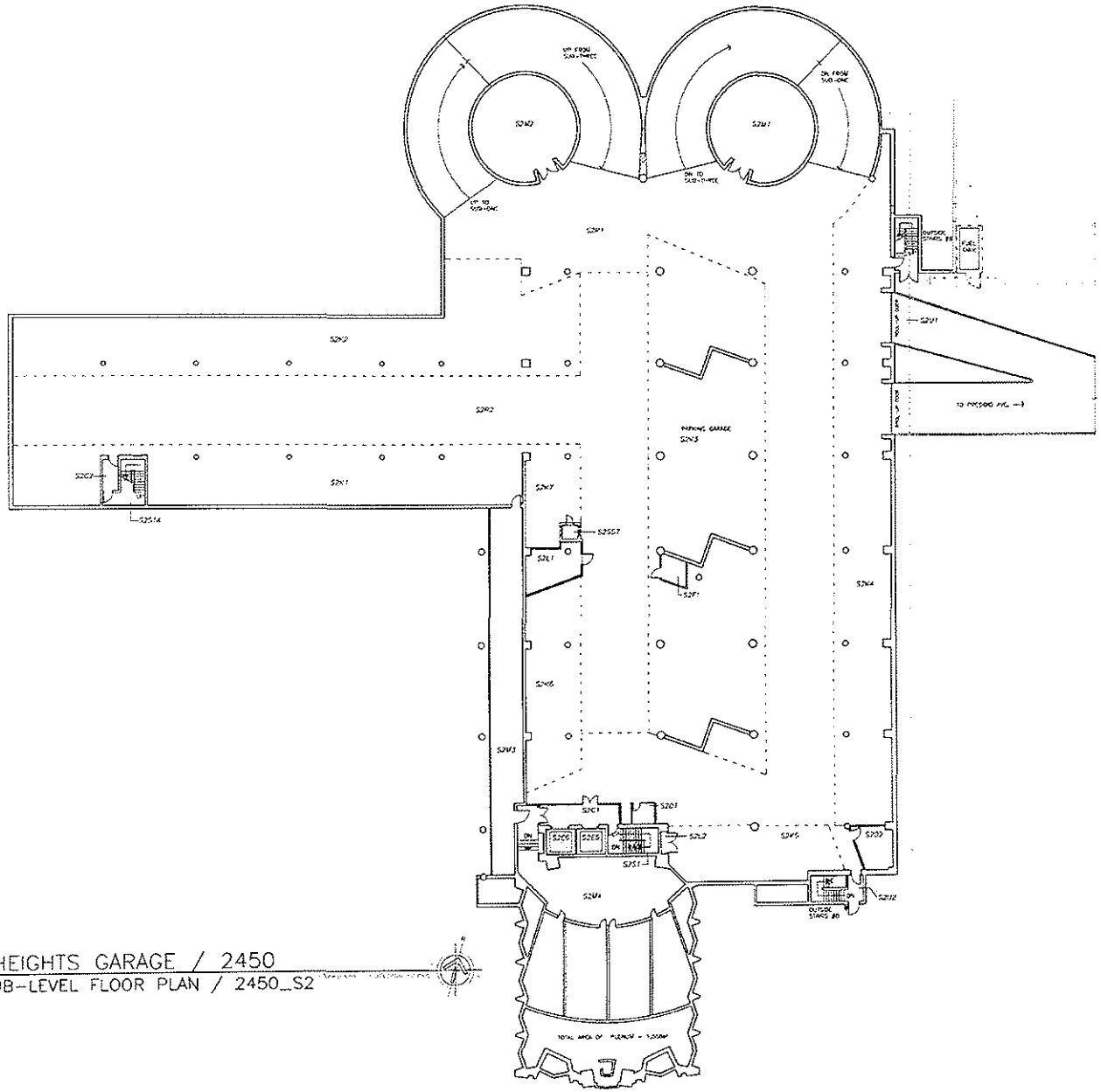
FOURTH FLOOR PLAN / 2450_04



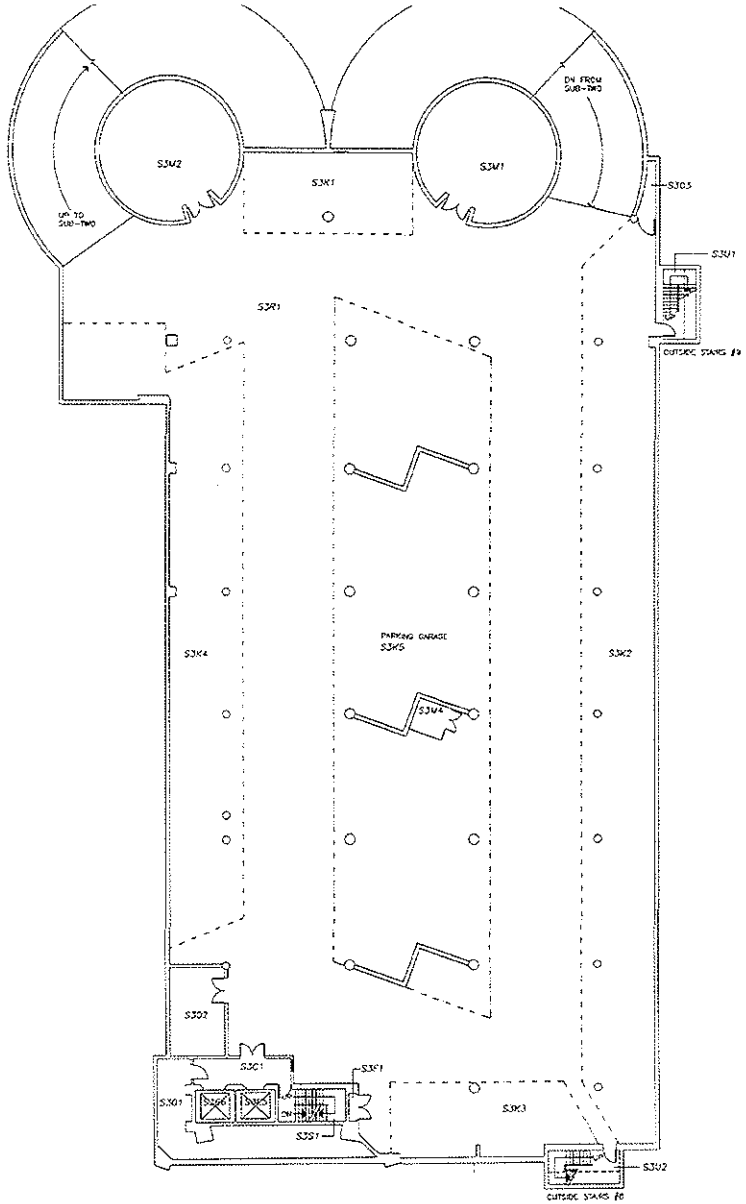
LAUREL HEIGHTS BUILDING / 2450
FIFTH FLOOR PLAN / 2450_05



LAUREL HEIGHTS GARAGE / 2450
FIRST SUB-LEVEL FLOOR PLAN / 2450_S1



LAUREL HEIGHTS GARAGE / 2450
SECOND SUB-LEVEL FLOOR PLAN / 2450_S2



LAUREL HEIGHTS GARAGE / 2450
THIRD SUB-LEVEL FLOOR PLAN / 2450_S3

EXHIBIT O

DRAFT

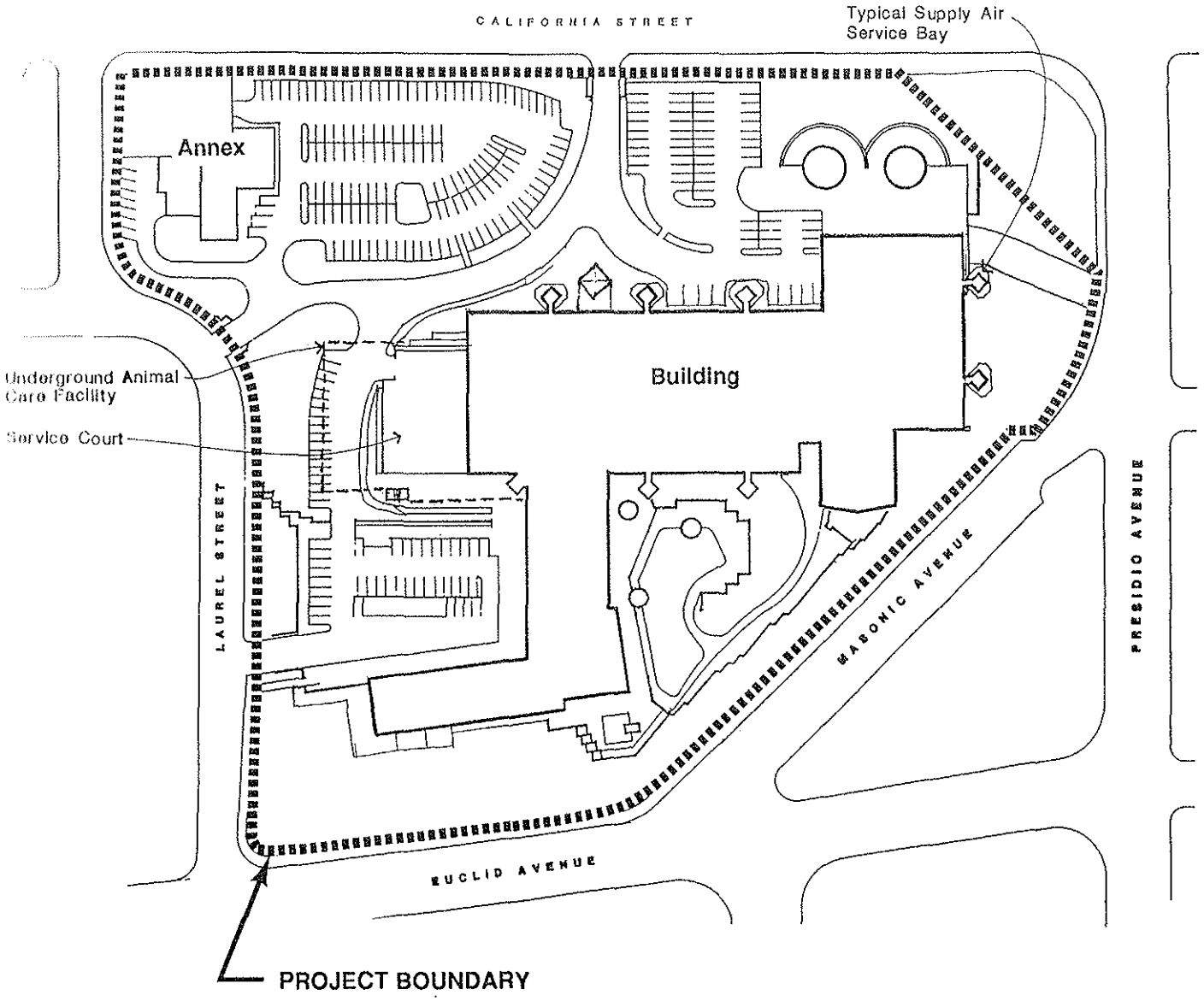
UNIVERSITY OF CALIFORNIA
SAN FRANCISCO – LAUREL HEIGHTS
ENVIRONMENTAL IMPACT REPORT

Volume 1: Report

October 27, 1989

Prepared by:
Office of the Vice Chancellor
with assistance from
Environmental Science Associates, Inc.

University of California
San Francisco



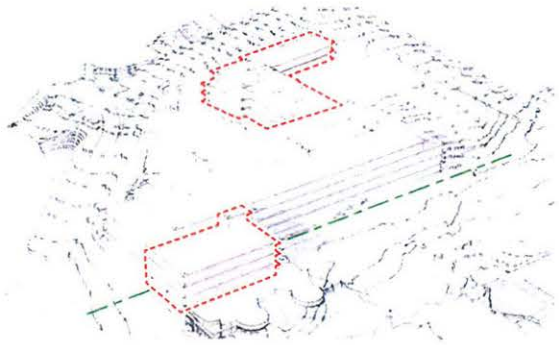
UCSF Laurel Heights

SOURCE: Stone, Marraccini & Patterson Architects

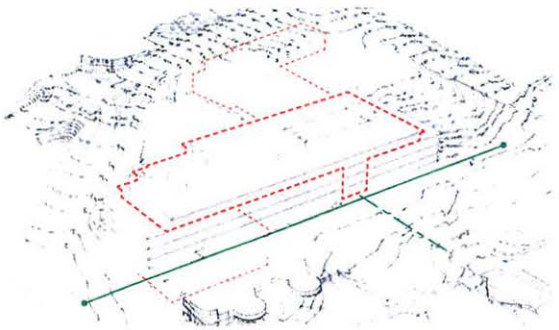
FIGURE 4
PROPOSED SITE PLAN

EXHIBIT P

1 Partial removal of existing structure, freeing up Mayfair Promenade axis.

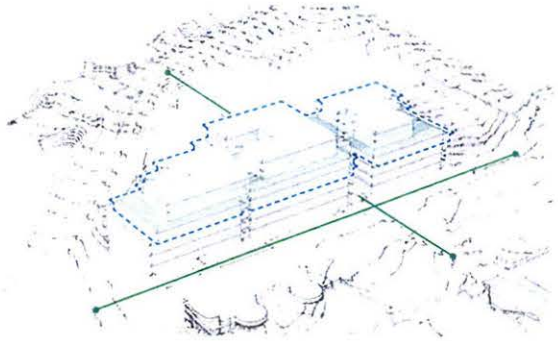


2 Rebuild and reinforce the existing 4th floor and cut opening for Walnut Walk axis.

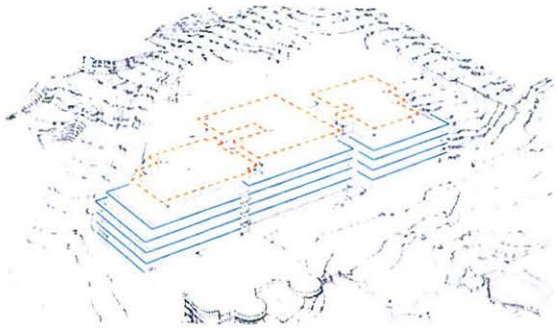


REMOVALS: THE SOUTH WING, NORTH WING AND THEATER ARE REMOVED TO REDUCE THE BUILDING BULK AND MASS. AN INTERNAL BAY IS OPENED UP TO CREATE WALNUT WALK

3 Add one and two floors that are set back from the existing building edge.

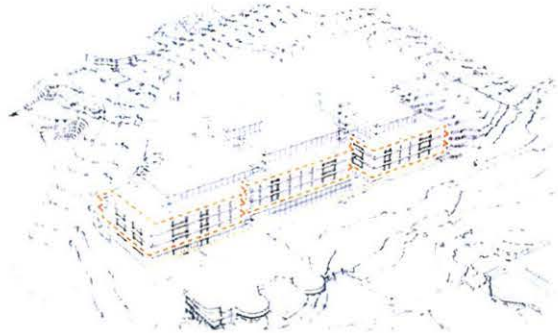


4 Restore the horizontal bands and add warm soffits to upper floor overhangs.

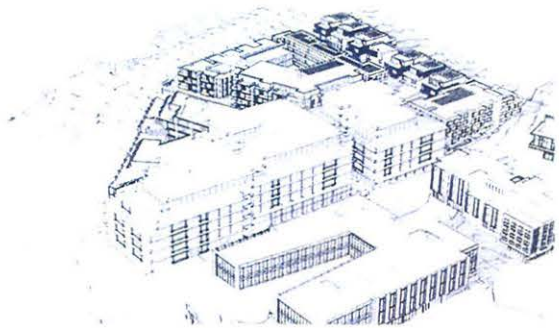


RESTORE AND REBUILD: THE EXISTING HORIZONTAL FLOOR LINES WILL BE RESTORED AND THE UPPER FLOORS WILL BE REBUILT WITH SETBACKS

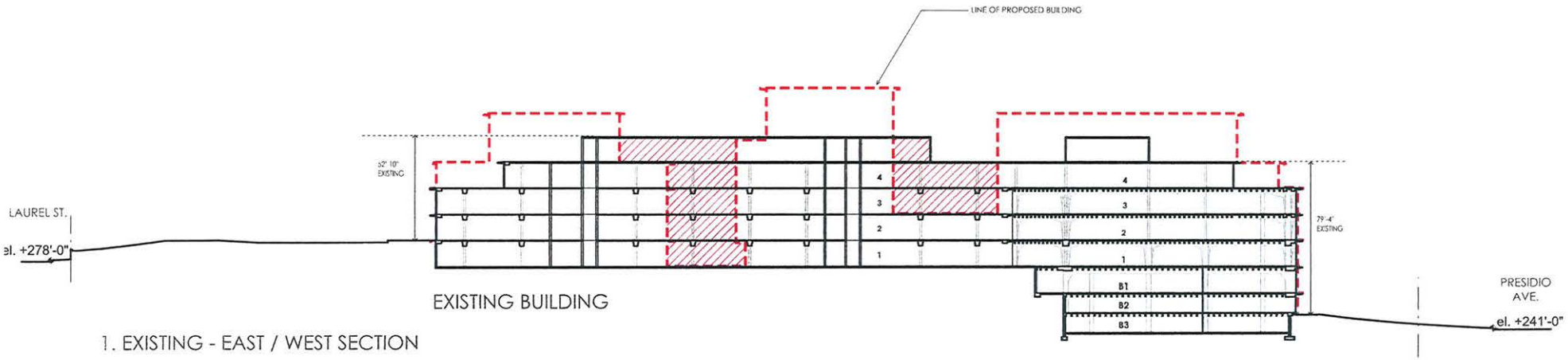
5 Articulate the exterior with high-performance glass, reveals at demising walls and bay windows at the bedrooms.



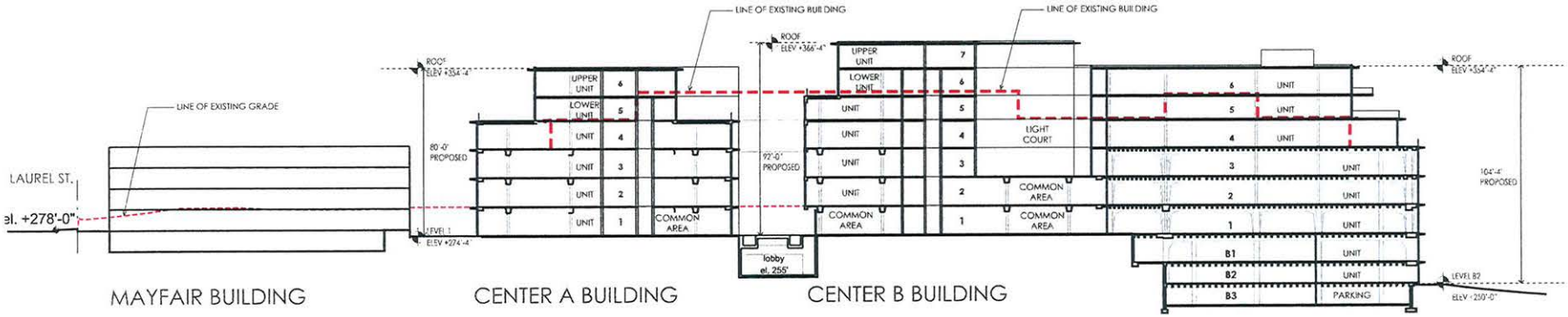
6 Completed design.



PROPOSED DESIGN: THE RESIDENTIAL QUALITY OF THE DESIGN IS ENHANCED WITH ARTICULATED BAY WINDOWS AT THE BEDROOMS. THIS MODULATES THE HORIZONTALITY OF THE OVERALL MID-CENTURY C OMPOSITION AND RELATES TO THE NEW BUILDINGS AND THE EXISTING NEIGHBORHOOD



1. EXISTING - EAST / WEST SECTION



2. PROPOSED - EAST / WEST SECTION

3333 CALIFORNIA STREET SAN FRANCISCO, CA

SKS JAMES CORNER FIELD OPERATIONS SLA ARUP BAR architects JENSEN SCB

CENTER A + B: EXISTING & PROPOSED SITE SECTIONS

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

A6.21

Re: 3333 California Street, San Francisco, CA
Record Number: 2015-014028ENV/CUA/PCA/MAP/DVA

Laurel Heights Improvement Association Appeal of Planning Commission's Certification of Final EIR/ CEQA Findings

Board of Supervisors File No: 191035

Exhibits to Statement of Petree A. Powell, MCP, JD

EXHIBITS Q - T

EXHIBIT Q

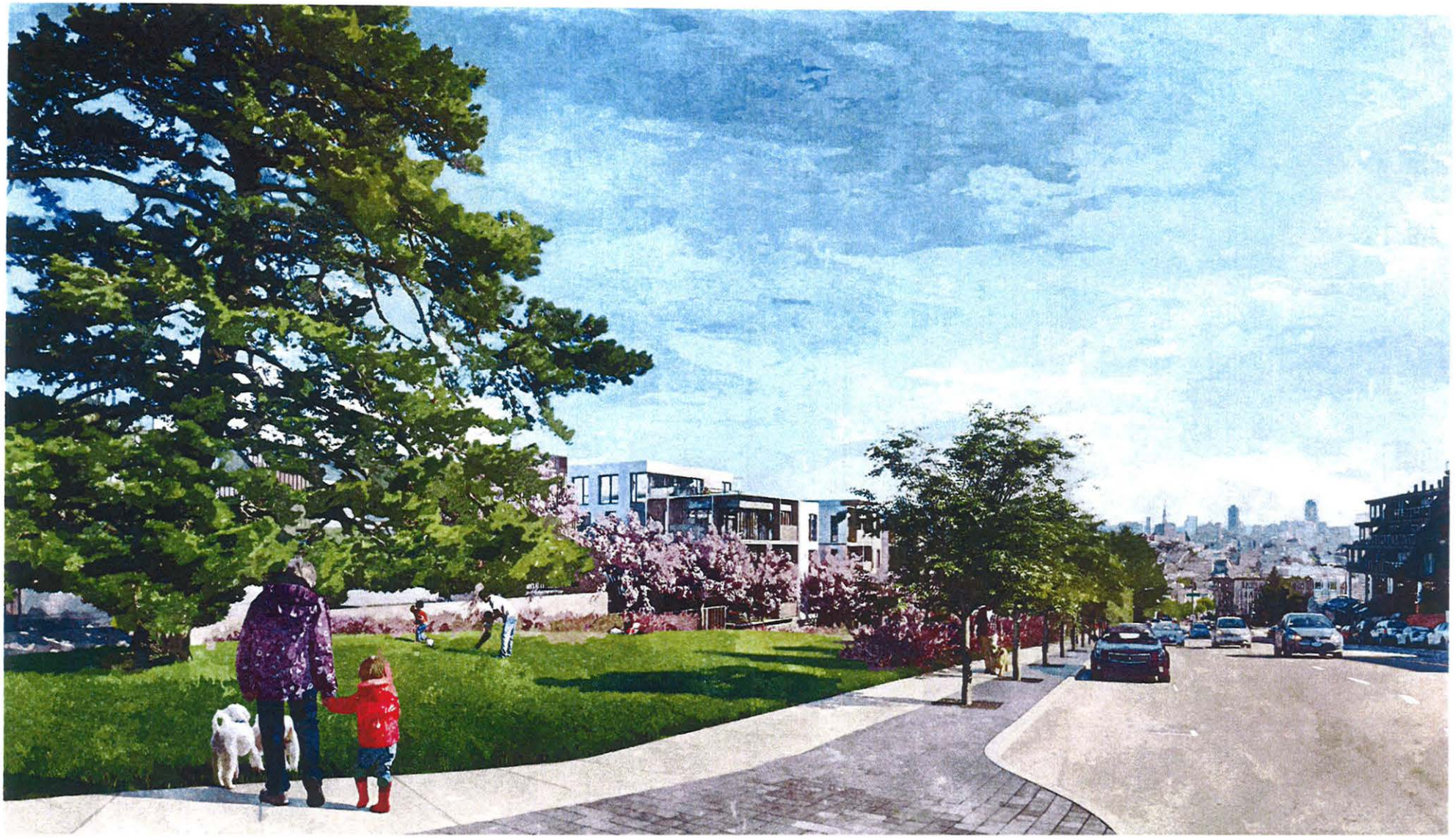
3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID GREEN PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | SLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

A8.61



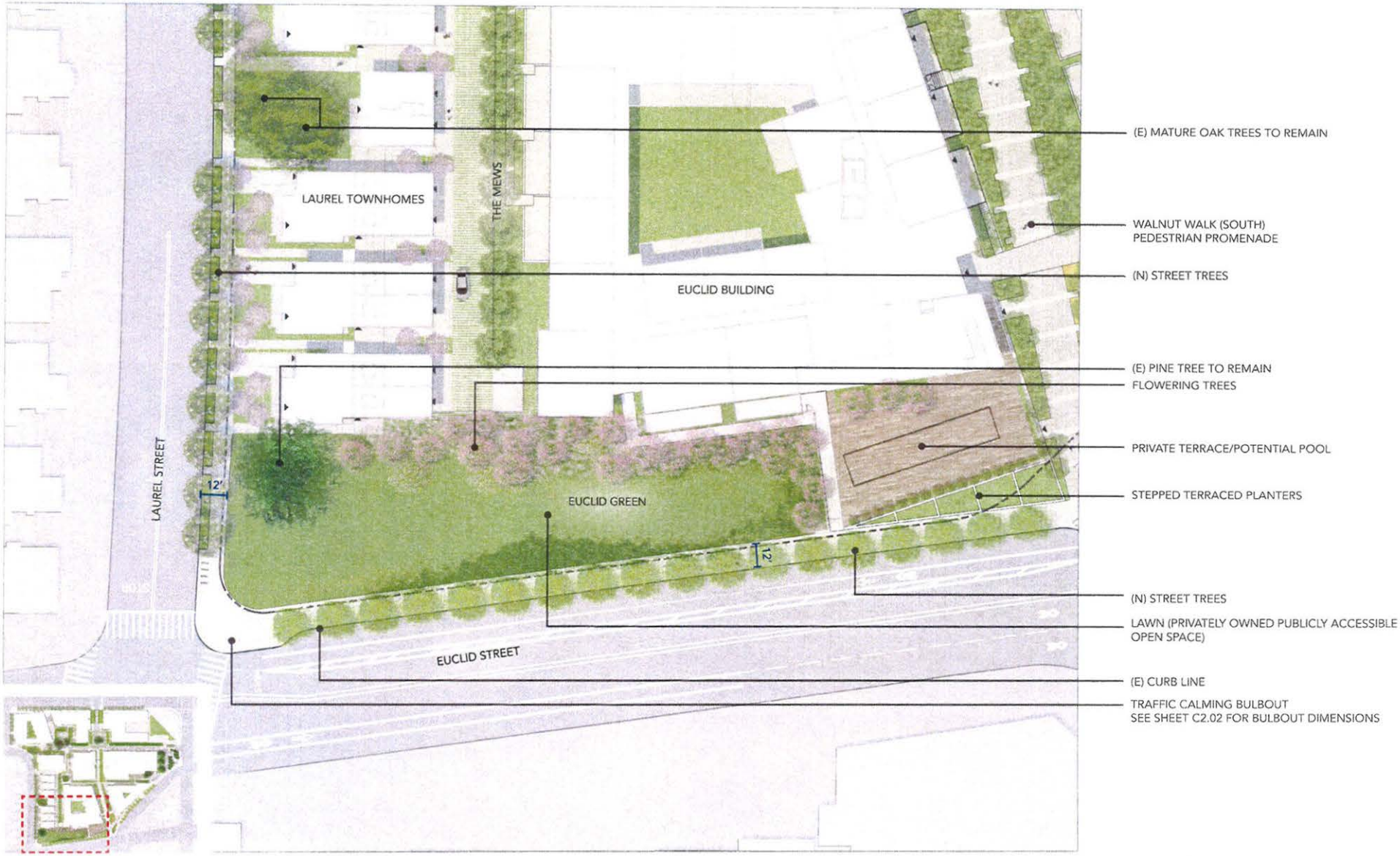
3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | SLA | ARUP | BAR architects | JENSEN | SCB

EUCLID GREEN - PERSPECTIVE

07.03.2019
PLANNING APPLICATION SUBMITTAL

L2.06B



3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | SLA | ARUP | BAR architects | JENSEN | SCB

ENLARGED PLAN - EUCLID GREEN STREETSCAPE IMPROVEMENTS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

L2.06

EXISTING STREET TREES

- EXISTING STREET TREES (15) *IN FRONT OF THE PROPERTY LINE
- EXISTING STREET TREES (8) AT ADJOINING PROPERTY
- KEY TREES TO BE PRESERVED (11)

PROPOSED STREET TREES

- PROPOSED STREET TREES AT CALIFORNIA ST (39) FRUITLESS OLIVE 'OLEA EUROPAEA SWAN HILL'
- PROPOSED STREET TREES (31) GINKGO 'GINKGO BILOBA PRINCETON SENTRY'
- PROPOSED STREET TREES (18) AESCULUS CARNEA
- KEY TREES TO BE PRESERVED (11)
- EXISTING STREET TREES (8) AT ADJOINING PROPERTY

3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | SLA | ARUP | BAR architects | JENSEN | SCB

SITE DIAGRAM - STREET TREES

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 40' 80' 160' 320'

L1.03

EXHIBIT R

TREANORHL

October 2, 2019

3333 California Street
San Francisco, California

Secretary of the Interior's Standards Compliancy Evaluation

INTRODUCTION

This report evaluates three proposed designs for 3333 California Street: the Proposed Project (and Project Variant), Preservation Alternative C from the Draft EIR, and a Community Preservation Alternative put forth by the Laurel Heights Improvement Association of SF, Inc. The 10.2-acre property, in the Laurel Heights neighborhood, consists of two buildings and a landscape designed to function as a single entity, dating from 1957. The buildings were designed by Edward B. Page, while the site was the work of Eckbo, Royston and Williams. The complex was created for the Home Office of the Fireman's Fund Insurance Company, the original tenant. The property is listed in the California Register of Historical Resources and has been determined eligible for the National Register of Historic Places.

METHODOLOGY

Nancy Goldenberg, Principal architect and architectural historian with TreanorHL reviewed the Draft EIR, which includes both the proposed design and several preservation alternatives, including full preservation alternative C. Ms. Goldenberg also spoke to Kathy Devincenzi and Richard Frisbee from the Laurel Heights Association regarding their preferred alternative. Ms. Goldenberg is already very familiar with the property, as she has lived in the nearby Anza Vista neighborhood for over 30 years. Each of the three alternatives (proposed project, alternative C, and the Laurel Heights Association's preferred alternative) will be evaluated according to the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation. As used herein, the term "Proposed Project" will include the Proposed Project Variant, unless otherwise indicated.

SIGNIFICANCE SUMMARY[1]

The following is the significance summary paragraph from the Draft National Register Nomination:

"The Fireman's Fund Insurance Company Home Office is eligible for the National Register under Criteria A and C at the local level. Under Criterion A, it is significant in the area of Commerce for its association with the San Francisco insurance industry, an important industry in the history of the city from the Gold Rush to the present. In particular, it represents the postwar boom in San Francisco's insurance industry when many companies built new office buildings. At that time, Fireman's Fund was one of the largest insurance companies in the United States. It was the only major insurance company headquarted in San Francisco. It was a leader among all insurance companies in San Francisco in its embrace of new ideas, symbolized by its move away from downtown to an outlying location. Under Criterion A, the Fireman's Fund Home Office is significant in the area of Community Planning and Development as one of the

[1] The district significance is summarized from Michael R. Corbett and Denise Bradley, *National Register of Historic Places Registration Form – Fireman's Fund Insurance Company Home Office*, April 19, 2018, Section 8.

principal embodiments of the postwar decentralization and suburbanization of San Francisco. Fireman's Fund was the first major office building to be built outside of downtown in a suburban setting and it was the first whose design was fully adapted to the automobile.

Under Criterion C, the Fireman's Fund Home Office is significant as the work of three masters, the architect Edward B. Page, the engineering firm of John J. Gould & H.J. Degenkolb/Henry J. Degenkolb & Associates, and the landscape architectural firm of Eckbo, Royston & Williams (ERW)/Eckbo, Austin, Dean, and Williams (EDAW). As a modernist, through his experiences in Paris in 1930, Edward Page had direct links to the birth of modern architecture and to its development in the United States. The Fireman's Fund Home Office is his best known and most important work. The Fireman's Fund Home Office – with its innovative structural design that provided open floors with minimal columns and exterior walls of glass – represents the beginning of the reputation of the Gould and Degenkolb engineering firms as among the leading structural engineers in San Francisco in the post-World War II period. ERW/EDAW was recognized as one of the country's leading landscape architectural firms during the period of significance, and their designs and writings contributed to the popularization of the modernist landscape design vocabulary and to modernism as an approach to creating outdoor spaces that addressed contemporary needs within a broad range of settings. The Fireman's Fund Home Office represents an example of the firm's mastery of modern design within a corporate landscape context. Additionally, the Fireman's Fund Home Office, a single property including both architectural and landscape architectural elements which were designed to complement each other, is significant under Criterion C as an example of a corporate headquarters in San Francisco that reflects mid-twentieth-century modernist design principles. The period of significance is 1957-1967, covering the period from the year when the first phase of the buildings and landscape were completed (1957) to the year the final phase of construction was undertaken (1967) by Fireman's Fund. The Fireman's Fund company continued on this site as a leading insurance company in San Francisco and nationally until it sold the property in 1983. Although there are numerous alterations, these alterations do not alter the essential character of a property and it retains a high level of integrity."

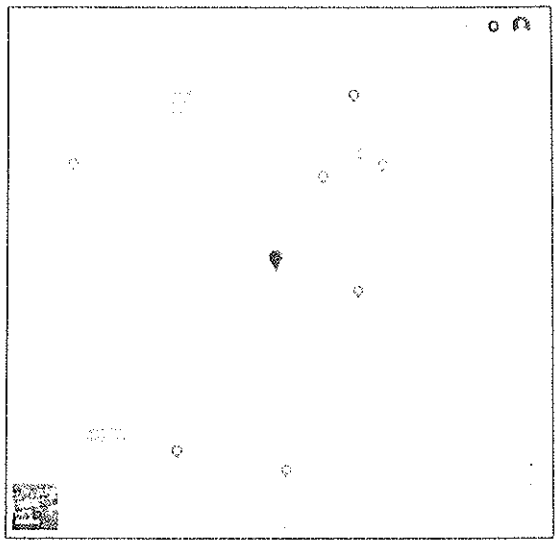


Figure 1 – Location Map

SUMMARY DESCRIPTION

"The Fireman's Fund Insurance Company Home Office is a 10.2-acre property in a central, predominantly residential area of San Francisco called Laurel Heights...The property consists of two buildings and a landscape that were designed to function as a single entity. The main building, referred to in the nomination as the Office Building, is a large three-to-seven-story building located in the center of the property. There is also a much smaller, one-story Service Building in the northwest corner of the property. The two buildings were designed to complement each other in character and materials. The Office Building is a glass walled building with an open character. The Service Building is a brick building with a closed character. The Office Building is an International style building which despite its size is built into its sloping hillside site in such a way as to minimize its presence. Its four wings, each built for different functions, range from three floors to seven floors. It is characterized by its horizontality, its bands of windows separated by the thin edges of projecting concrete floors, and brick trim. The wings of the building frame outdoor spaces whose landscape design connects the outdoors with the indoors both functionally and conceptually. The landscape design includes outdoor spaces for use by employees, parking lots, circulation paths, and vegetation. The principal outdoor spaces are the Entrance Court, the Terrace, and small areas around the Auditorium."[2]

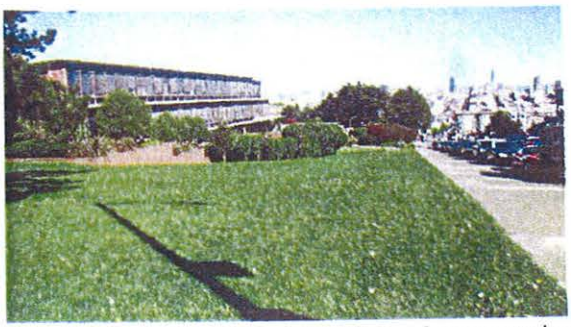


Figure 2 left: View of Property looking northwest, from Masonic. Figure 3, right: View of property looking east, from the corner of Euclid and Laurel.

The following are the character-defining features of the property, as listed in the Draft National Register Nomination. Since the property has been listed in the California Register of Historical Resources by the California Office of Historic Preservation, and that listing was based, in part, on this list of character-defining features, this is the list that should be included in the EIR.

The character defining features of the Office Building are as follows:

- Plan of the building with wings open along the sides to the immediate landscape and to views of the city.
- Horizontality of massing.
- Horizontal lines of projecting edges of concrete floors.
- Horizontal bands of nearly identical window units.
- Uninterrupted glass walls.
- Window units of aluminum and glass.

---

[2] Michael R. Corbett and Denise Bradley, *National Register of Historic Places Registration Form – Fireman's Fund Insurance Company Home Office*, April 19, 2018, Section 7.

- Circular garage ramps.
- Exposed concrete piers over the garage.
- Wrought iron deck railings that match gates in the landscape.
- Brick accents and trim.

Service Building

- Massing of rectangular volumes
- Brick Walls with a minimum of openings

Landscape
Terrace, as the centerpiece of the landscape, designed to integrate the architecture of the building with the site and with the b roader setting (through views of San Francisco); key character-defining features include its biomorphic-shaped lawn surrounded by a paved terrace and patio (paved with exposed aggregate concrete divided into panels by rows of brick); brick retaining wall and large planting bed around the east and north sides of the paved patio, custom-designed wood benches, and three circular tree beds constructed of modular sections of concrete.

Entrance Court, providing a connection between the Executive/Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria Wing; key character-defining features include a central paved parking lot surrounded on its north, east and west sides by narrow planting beds; exposed aggregate sidewalks along the north, east, and west sides of the parking lot; and a low free-standing brick wall along its north side.

Two outdoor sitting areas – one on the east side of the Auditorium and one on its west side – that connect to entrances into the Auditorium; key character-defining features for the area on the west side of the Auditorium include the pavement (exposed aggregate divided into panels by rows of bricks), circular tree bed constructed of modular sections of concrete; and metal benches; key character-defining features for the area on the east side of the Auditorium include the pavement (concrete divided into panels by wood inserted into expansion joints).

Brick wall (constructed of red brick set in running bond pattern similar in appearance to brick used in exterior of main building) that takes several forms and which forms a continuous and unifying element around the edges of the site.

Three gated entrances – one for the employees on California Street and the service and the executive/visitor entrances on Laurel Street – that are integrated into the brick perimeter wall.

Internal Circulation System (entrance drive, service drive, East and West Parking lots).

Vegetation features that help to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods including (1) the large trees in and around the East and West Parking Lots, (2) the lawns on the west, south, and east sides of the property, and (3) the planted banks along Laurel and Masonic Streets.

PROJECT DESCRIPTION

"The Proposed Project would partially demolish the existing office building, divide it into two separate buildings, vertically expand it to include two to three new levels (proposed building heights of 80 and 92 feet) and adapt it for residential use. The two separate buildings would be connected by a covered bridge. Thirteen new buildings ranging in height from 37 to 45 feet would be constructed along the perimeter of the site along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street. The Proposed Project would demolish the existing service building, surface parking lots and circular garage ramp structures. New public pedestrian walkways are proposed through the site in a north-south direction along the line of Walnut Street and in an east-west direction along the line of Mayfair Drive.

A Proposed Project Variant would add three new residential floors (proposed building height of 67 feet) containing 186 additional residential units in the new multi-story building along California Street between Walnut Street and Presidio Avenue."[3]

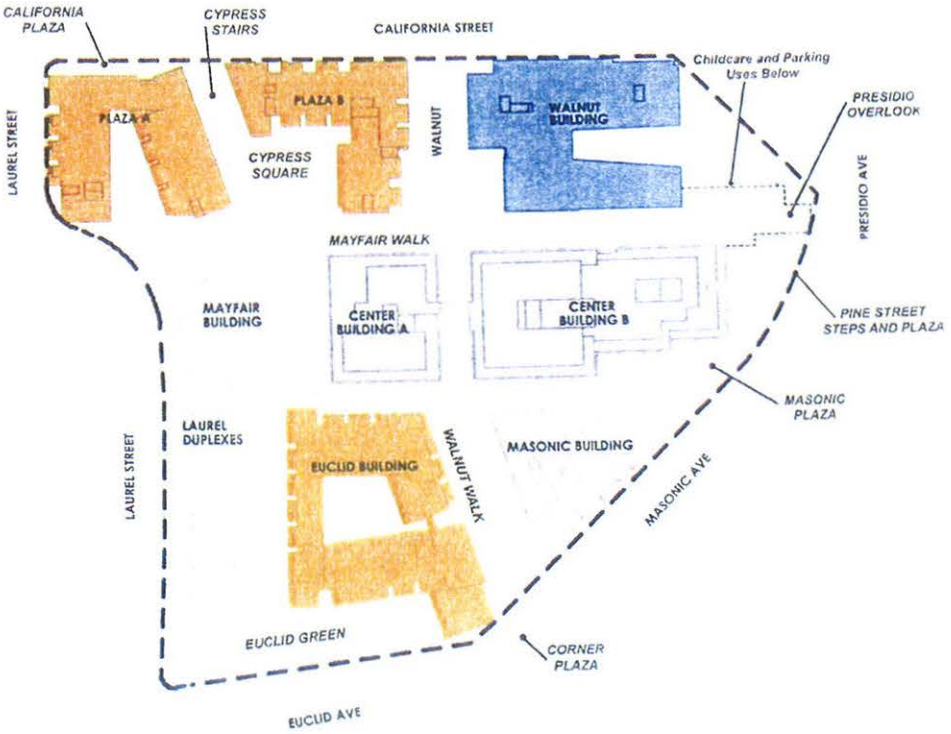


Figure 4 – The Proposed Project site plan

[3] [3] The project description is largely taken from the Draft Environmental Impact Report, 3333 California Street Mixed-Use Project, November 7, 2018, pp. S.2 and 2.6.

PRESERVATION ALTERNATIVE C

The Draft Environmental Impact Report lists several project alternatives, some of which have fewer impacts to the historic resource than does the Proposed Project. Full Preservation Alternative C proposes a less intensive development of the site, retaining more of the Main Building and landscape. Under this Alternative, new construction is limited to the northern, and a small area in the western, portion of the site, along California and Laurel Streets. The Main Building would receive a one-level vertical addition, and the glass curtain wall would be replaced with "a compatible design to accommodate the residential use." Along California Street, four new mixed use/multi-family residential buildings would be constructed, with ground floor retail. 534 total residential units would be created.

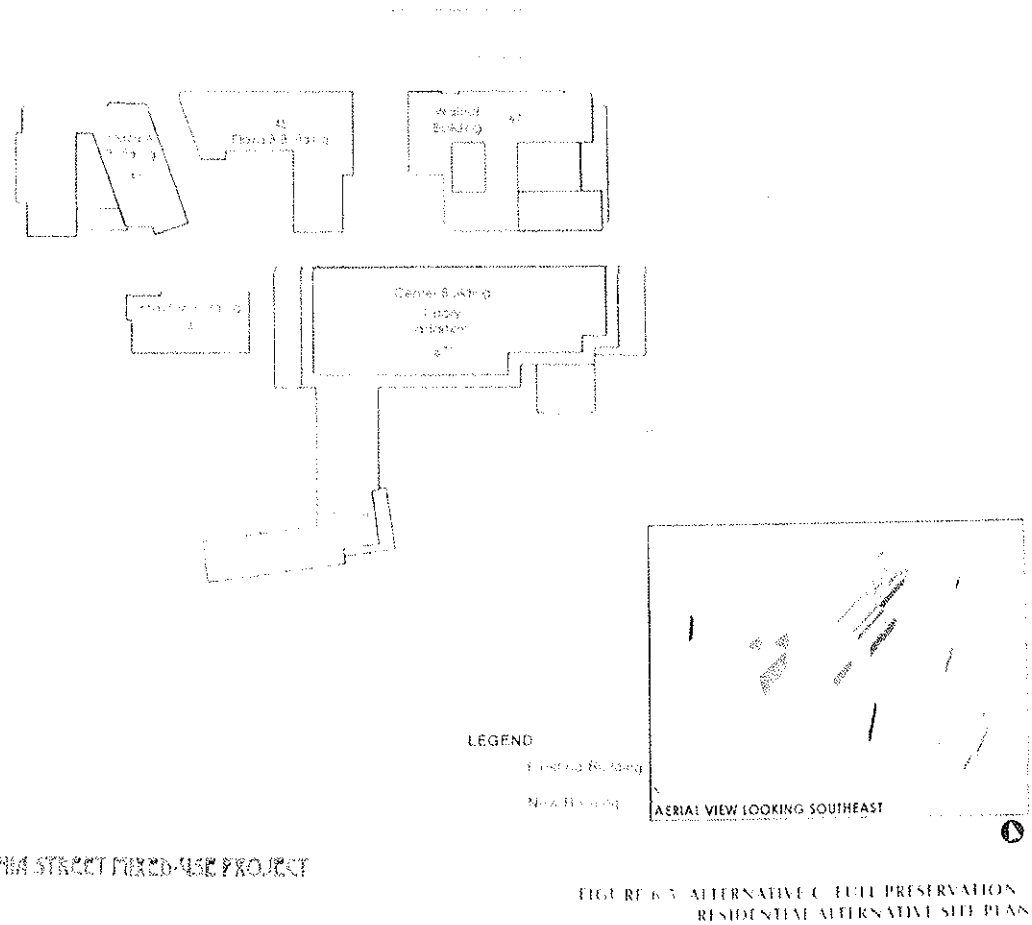


Figure 5 – Full Preservation Alternative C

COMMUNITY FULL PRESERVATION ALTERNATIVE

The Laurel Heights community has come up with its own preservation alternative. This alternative retains more of the historic resource while providing more residential units than does Preservation Alternative C.

The Community Full Preservation Alternative (Community Alternative) would construct the same number of new housing units as the developer's proposed project (558 units) or project variant (744 units) and would be completed in approximately three years rather than the 7-15 years requested by the developer to complete his proposals. In determining the unit count, TreanorHL used the same unit sizes as was used in the Developer's design. The Community Alternative would preserve virtually all of the character-defining features of the main building and its integrated landscaping, which are listed in the California Register of Historical Resources pursuant to Section 4851(a)(2) of the California Code of Regulations. In addition, the Community Alternative would excavate only for a single, one-level underground parking garage and for the foundation for the Mayfair Building. In contrast, the developer proposes to excavate for three new underground garages including a three-level one.

The Community Alternative would keep the main building in its entirety, only adding two light wells to bring light and air into the center. The existing north-south through passage would remain. As in the other proposals, the Service Building would be demolished. A new residential building would be constructed near the intersection of Mayfair Drive and Laurel Street. Two other new buildings would be constructed along California Street, replacing what are now surface parking lots and the former Service Building. These new buildings would match the scale and massing of the residential townhouse buildings across California Street, and would also be designed to be compatible with the Main Building.

For a complete description of this Alternative, please see Appendix A.

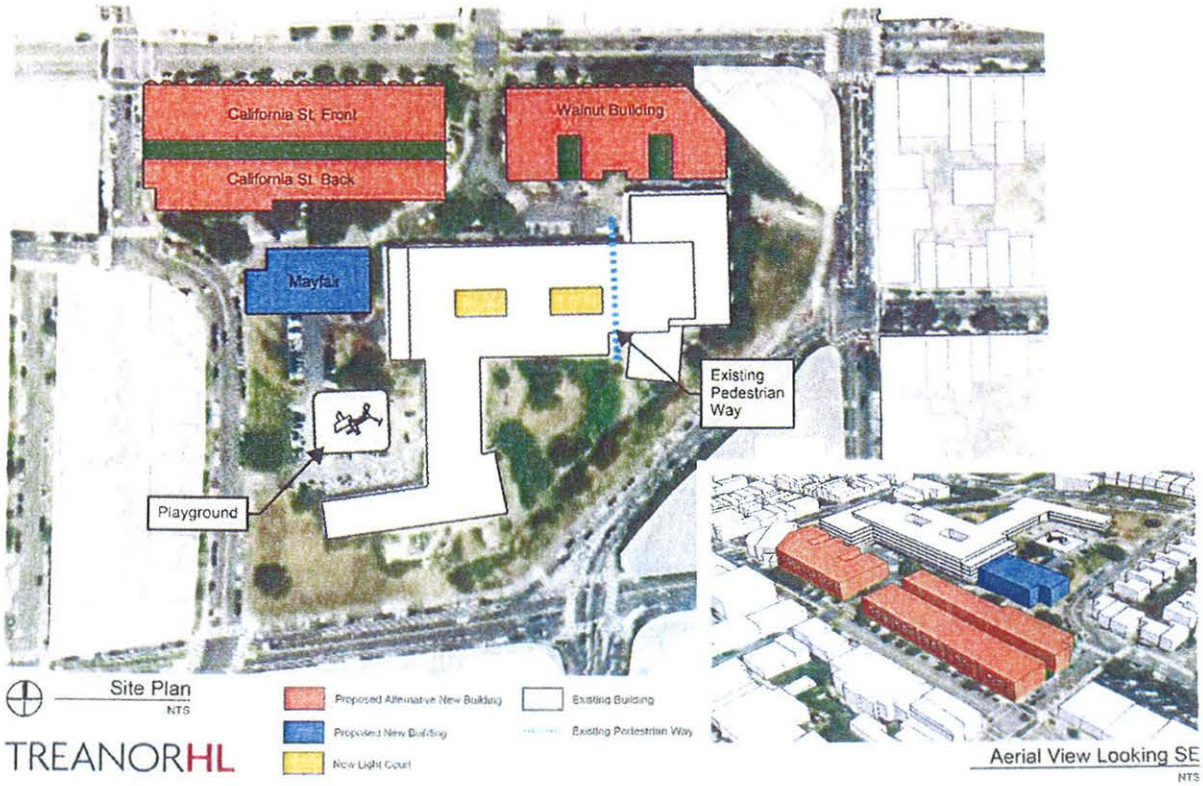


Figure 6 – The Community Full Preservation Alternative

SECRETARY OF THE INTERIOR'S STANDARDS ANALYSIS

The following evaluates the Community Preservation Alternative's compliance with the Secretary of the Interior's Standards for Rehabilitation (Standards). Where appropriate, we also compare the compliance of the Community Preservation Alternative with that of the Proposed Project as well as "Preservation Alternative C," as presented in the Environmental Impact Report.

The Standards are listed below. Each of the 10 Standards is shown in italics, with the analysis of how each of the three proposals – the Community Full Preservation Alternative, the Proposed Project, and Preservation Alternative C from the Draft EIR – meets or fails to meet each 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.

While the historic use of the property was office, with an office building set amongst green space and parking, the conversion of the property to residential could be done while retaining the character-defining features of the building and site. While the proposed Project design does not retain these features, the Community Preservation Alternative does. Therefore, the Community Preservation Alternative design complies with Standard 1.

Since the Proposed Project would destroy most of the character-defining features of the building and site, it does not comply with Standard 1, although given the proposed use, this standard can certainly be met, as is demonstrated by the Community Preservation Alternative. Preservation Alternative C, like the Community Preservation Alternative, does meet Standard 1.

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 Community Preservation Alternative retains most of the character-defining features of the main building and site. Most of the new construction will occur at the parking lot along California Street, which is not considered character-defining. The main building will be retained in its entirety, except for two lightwells that will provide interior illumination. The landscaping will also be retained. The Proposed Project removes the wing from the main building and cuts it in two. The Proposed Project also destroys most of the existing landscaping. Therefore, while the Community Preservation Alternate complies with Standard 2, the Proposed Project does not.

Preservation Alternative C is more compliant with Standard 2 than is the Proposed Project but will have more impact on the property than will the Community Preservation Alternative. Preservation Alternative C proposes to add a story to the Main Building and replace the building's glass curtain wall. Without knowing the design of the vertical addition, or what will replace the curtain wall, it is difficult to determine whether these features will be compatible. Also, it should be noted that many residential buildings now feature curtain walls, so it is unclear why the existing curtain wall is incompatible with residential uses.

Although not described in the Draft EIR, the developer's August 17, 2017 plan sheet A6.01 has proposed installing bay windows to enhance the residential quality of the design. Since these bay windows would diminish the horizontality of the main building, which is one of the character-defining features of the historic resource, this alteration would not be consistent with the Secretary of the Interior's Standards.

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 Community Preservation Alternate does not propose adding any conjectural features that would create a false sense of historical development. Therefore, the Community Preservation Alternative complies with Standard 3.

Neither the Proposed Project nor Preservation Alternative C propose changes that would create a false sense of historical development, so these designs would also comply with Standard 3.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

As described in the California Register Nomination, the Main Building was constructed in phases. The first part of the building was completed in 1957. However, its siting, plan and structure were designed such that it could accommodate future expansion. This expansion took place from 1963 to 1967, in three phases, which added wings to the building. The work was designed by the original architect, and constructed by the original contractor for the original client (Fireman's Fund). The wings are now over 50 years old, and are considered part of the historic resource even if they were not part of the original construction. Since that time, most alterations have occurred on the interior, typical of open-plan office buildings. Under the Community Preservation Alternative, the wings would be retained; under the Proposed Project they would not be. The Community Preservation Alternative therefore meets Standard 4, while the Proposed Project does not. Similar to the Community Preservation Alternative, Alternative C complies with Standard 4.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

The Community Preservation Alternative will retain all distinctive features of the main building and landscape, including the curtain wall and footprint. And, by not raising the height of the building, its horizontality will also be retained. Character defining features of the site will also be retained. (The Service Building, however, will be demolished under this scheme, as it would under the Proposed Project and Preservation Alternative C. While the Service Building is an original feature of the site and contributes to its historic significance, the loss of this building would have only a minor impact on the overall integrity of the property). Therefore, the Community Preservation Alternative complies with Standard 5.

The Proposed Project is demolishing too much of the Main Building and the landscaping to comply with Standard 5. Preservation Alternative C is superior to the Proposed Project but will have a greater impact on the property than will the Community Preservation Alternative. Alternative C proposes to replace the

curtain wall and add a vertical addition, which could impact the building's horizontality, which according to the California Register Nomination is an important character defining feature. Therefore, while better than the Proposed Project, Alternative C does not fully comply with Standard 5.

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.

During the design phase, the property, including building and landscape features, should be carefully surveyed to determine the condition of all character defining features. If any of these features are found to be deteriorated, they should be repaired rather than replaced, and any features that are deteriorated beyond repair should be replaced in kind, or, if substitute materials must be used (if, for example, the same material is no longer available), then the substitute material should match the old in design, color, texture and any other visual qualities. If that is done, then the Community Preservation Alternative will comply with Standard 6.

The Proposed Project, however, since it will remove most of the character defining features of the property, will not comply with this Standard. Alternative C, since it retains more of the historic resource, would not fully comply with Standard 6 because it would replace the glass curtain window wall system "with a residential system that would be compatible with the historic character of the resource; e.g. operable windows with small panes divided by a mullion and muntins." DEIR p. 6.77.

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.

No harsh chemical or physical treatments are contemplated at this time. If they are avoided, then the Community Alternative will meet Standard 7.

Since the Proposed Project is removing so much of the resource, the SOIS Analysis in the Draft Environmental Impact Report simply claims that Standard 7 does not apply. The Community Alternative and Alternative C could comply with Standard 7 provided that harsh chemical or physical treatments are prohibited.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Since the project site was formerly part of a cemetery, it is possible that archaeological resources may be encountered during the construction of any project on this site. Language in the specifications must direct construction personnel to stop work should any archeological features be encountered. A professional archeologist would then be alerted to come and identify, document, and safely remove (if warranted) the feature. If such protocols are put into place prior to the start of construction, the project will comply with Standard 8.

According to the EIR, "Mitigation has been identified to reduce the potential impact to archaeological resources to a less-than-significant level. Thus, the Proposed Project or Project Variant would conform

with Standard 8." If Alternative C and the Community Preservation Alternative follow similar protocols, than they too would comply with Standard 8.

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.

For the Community Preservation Alternate, the exterior envelope of the Main Building will be kept intact, and new construction is proposed primarily along California Street, where currently non-character-defining parking lots exist. These new structures can be designed such that they are compatible with both the Main Building and the existing buildings along the north side of California Street. This can be accomplished by utilizing brick, glass, and concrete as exterior materials (tying into the materials of the Main Building), while maintaining the rhythm and scale of the townhouses across California Street. The Community Alternative will therefore comply with Standard 9. In addition, the Mayfair Building would be designed to be compatible with the Main Building.

The proposed project, on the other hand, does not comply with this Standard. Portions of the Main building will be removed, and most of the landscape will be destroyed. Therefore, the Proposed Project will not comply with Standard 9.

Preservation Alternative C is more compliant than the Proposed Project. However, the massing of the new buildings along California Street is very different from the buildings across California Street, and from the residential development surrounding the site.

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.

For the Community Preservation Alternative, new construction would be relegated to the parking lots along California Street and a Mayfair Building. The Main Building would retain its existing form, and the curtain wall would be retained (however, given that the present curtain wall, according to the California Register nomination, has become darker since the sale of the building to UCSF in 1985, the curtain wall could be revised if the original tint can be determined.) The work proposed for the Main Building would almost entirely occur on the interior, with the exception of two proposed lightwells. So, if the proposed new development is removed in the future, the property could easily be returned to its historic appearance.

The Proposed Project would make so many changes to the building and landscape that it would not comply with Standard 10. Alternative C does better at compliance than the Proposed Project. However, with the proposal to replace the curtain wall and add a story to the building, it is difficult to see how the original form and integrity of the property could be returned if the changes were reversed. Therefore, Alternative C would not comply with Standard 10.

Conclusion

The above discussion evaluates the Community Preservation Alternative's compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation. It also discusses how and whether the Proposed Project and Alternative C complies with these standards. Here are the results:

Community Preservation Alternative: Complies with all 10 Standards

Proposed Project: Complies with Standards 3 and 8 only.

Alternative C: Complies with Standards 1, 3, 4, 6, 7, and 8. Partially complies with Standards 2, 5 and 9. Does not comply with Standard 10.

The Community Alternative is clearly superior in its compliance with the Standards than are the other two designs evaluated. In addition, it provides more housing units than Alternative C, and the new construction is more compatible with surrounding neighborhood development.

The evaluation herein applies equally to the Proposed Project Variant, as it would have the same effect on the character-defining features of the resource as the Proposed Project. The Community Full Preservation Alternative Variant's compliance with the Secretary of the Interior's Standards would be the same as that of the Community Full Preservation Alternative.

Nancy Goldenberg

January 7, 2019

Nancy Goldenberg, Principal — Date

EXHIBIT S

Kathy Devincenzi <krdevincenzi@gmail.com> Wed, Oct 17, 2018 at 6:39 PM
To: Dan Safier <dsafier@pradogroup.com>
Cc: Richard Frisbie <frfbeagle@gmail.com>, "M.J. Thomas" <mjinsf@comcast.net>, Catherine Carr <catherine.a.carr@gmail.com>, Linda Glick <lindaglick@hotmail.com>, "John Rothmann (johnrothmann2@yahoo.com)" <johnrothmann2@yahoo.com>

Dan,

Although we gave you the courtesy of notice that we were going to submit to the California Office of Historic Preservation a nomination of the site as a historical resource, you did not afford the same courtesy to us when you went to the Architectural Review Committee of the SF Historic Preservation Commission. There, you presented your consultant's proposed preservation alternatives, and the committee agreed that they were sufficient preservation alternatives for discussion in the EIR. In thirty years of working with neighborhoods, I have never before had anyone fail to inform me of a hearing.

Your alternatives were actually not sufficient, as those alternatives propose office use of the existing structure. We all know that the City needs housing.

As we told you at our last meeting, we are preparing a preservation alternative that would use the main building principally for housing and build other housing on the site. We request that you inform the Planning Department that you agree that this community preservation alternative is to be included in the Draft EIR and that the release of

the Draft EIR should be delayed until January 2, 2019, so the community is not inconvenienced by a hearing the week after Thanksgiving on the Draft EIR. We have been informed that these requests can be granted with the developer's agreement.

Also, we previously attended a meeting that you held with the Laurel Village merchants, and you told them that you wanted to meet with them privately in the future. Many of the meetings you claim to have held were private meetings.

In addition, after the Initial Study was released for your project without a greenhouse gas emissions study or a traffic study, a couple months later you and the Planning Department sent a greenhouse gas emissions analysis and a transportation analysis to the Governor's Office of Planning and Research without informing us that you had applied for environmental review streamlining. Had you truly been interested in openness and collaboration you would have released this information to the public or posted it on your website at the time you submitted it.

Although we met with you at each available opportunity, you took a Top-Down approach and would not plan the development in collaboration with the community. At one of your poster-board sessions, your representatives told people that rezoning was not necessary, and I immediately reported this to Dan Kingsley. He said, "you and I know that rezoning is needed" but I did not see him make any effort to instruct his representative to tell the truth to the community.

You only spoke to the community once about your proposal and would not allow members of the public to speak, answering only a few questions written on cards.

At our last meeting, we told you that you had concealed the historical significance of the property from us and the community and that you now need to redesign the project in accordance with the Secretary of Interior's standards for reuse of historical resources. You said: "Forget the rules, do you like it?" I said that I did and that I thought the seamless connection between the indoor spaces and outdoor landscaping was a brilliant idea and that you could do something really good with the views and landscaping. You replied: "You are not going to redesign this project." We think the rules apply to you and hope you will have a change of heart.

You have chosen to push along with an impactful proposal that is strongly opposed by the majority of the community. Since you have preferred private meetings, I am sure you will understand that the community needs an opportunity to meet without interference to discuss the upcoming schedule and hearings. Knowing the community views as I do, I think they would regard your presence as unwelcome at this point, so we hope you will honor their need to join together in protection of their neighborhood without your interference.

In order to keep communications open, we offer you a meeting with our Association's Executive Committee on Friday October 19 between 11 am and 7 pm or at a mutually convenient time in the next two weeks. You could arrange the location. We understand that you are going to submit revised plans to the Planning Department. You should send them to us as soon as possible.

Also, our Association has held election of officers. John Rothmann has retired and is no longer an officer, so further communications to the Association should be sent to me.

Laurel Heights Improvement Association of SF, Inc.
By: Kathy Devincenzi, President
[Quoted text hidden]

Kathy Devincenzi <krdevincenzi@gmail.com> Wed, Oct 17, 2018 at 6:42 PM
To: catherine.stefani@yahoo.com

fyi
[Quoted text hidden]

EXHIBIT T

Petree A. Powell, MCP, JD
13416 Greenwood Court
Sainte Genevieve, MO 63670
314.283-3599
petreepowell@gmail.com

Professional Experience:

Community Development Director — ***City of Sainte Genevieve, Missouri***
2014-2016 — ***165 S. Fourth Street***
Sainte Genevieve, MO 63670

Administrator specializing in community development, historic preservation, planning, zoning, building permitting, code enforcement, flood plain management, and geographic information systems (GIS) for the inventory and documentation of the 825 historic structures and sites within the city limits:

- Acted as staff liaison to the "Ste. Genevieve Heritage Commission" and "Planning Commission". Reviewed all applications for "Certificates of Appropriateness" to any change, modification or demolition of any historic structure or site with the United States ***National Register of Historic Places***, which includes the ***National Historic Landmark District*** approved in 1959, one the first to be made. The District encompasses nearly the entirety of the city;
- Interacted with the Board of Aldermen, including preparation of the revised Preservation Ordinance, historic preservation commission appeals, other planning and community development ordinances and regulations related to planning and community development;
- Reorganized City documentation of the city's historic structures, and prepared a successful State preservation grant to implement geographic information system in coordination with the City's Water and Sewer provider. Developed protocol for collection of data for entry into the GIS system and supervised employees collecting said data. Facilitated interaction and contract with the St. Genevieve County Assessor which has significantly more financial resources and the complete version of the GIS program. Prepared and assessed bids for host GIS contractor. Interacted with the host contractor to install appropriate protocols to capture all relevant data, documentation and field observations of the 825 historic structures with the city limits;
- Facilitated use of newly installed GIS program to identify assess and identify structures threatened by the significant flooding of the Mississippi River in December 2015 if the current Corp of Engineers levy failed or flood waters topped the levy surrounding the town site;
- Additional duties include: Supervising Building Department inspections, permitting and code enforcement. Assist in other matters related to city management. Served as the City's liaison to the downtown Main Street Program, "Ste. Genevieve Downtown Renewal Project". Assisted in organizational development, non-administration and interaction with public entities.

**Sainte Genevieve was one of the earliest European Settlements west of the Mississippi. The French settlement established circa 1790 as part of the "Illinois Country" upper Mississippi River Valley. Its current population is less than 4500 residents and sits on a flood plain adjacent to the Mississippi River. The city was designated a National Historic Landmark in 1960. Its status was achieved because it possesses the largest extant collection of French vernacular vertical log houses (known as Poteaux-sur-sol and Poteaux-sur-sol) in North America. Ste. Genevieve has 27 of the 32 that still exist in North America. The architecture and cultural landscape in Ste. Genevieve constitutes the unique survival and continuation of French traditional architecture under Spanish, and later, American Rule. It captures the arc of French Settlements in transition to multi-cultural towns on the frontier of settlement in the late 18th and early 19th centuries. The remaining historic structures represent the German influence on the architecture from 1830 to 1950. After the 1993 flooding of the Mississippi River bypassed the traditional requirements of National Flood Insurance and Corp of Engineers for flood mitigation protocol, an engineered levy was approved and built to protect these unique structures because of the high significance. Further in 2018, the National Park Service was authorized to establish the Ste. Genevieve National Historic Park, which includes the 27 vertical log structures that contribute to the Historic District.

Interim Director of Finance — ***City of Wentzville, Missouri***
(through Interim Public Management, LLC) — ***310 West Pearce Blvd.***
2013 — ***Wentzville, MO 63385***

Providing the interim management of the Finance Department including: overseeing an annual overall budget of $52 million, including investments of unrestricted and restricted (project) funds; developing internal management procedures and controls concerning investments, travel, purchasing cards, and other AP related matters; assisting other departments with financial aspects of ongoing construction projects; proving support to the Professional Services Committee in the selection of various vendors for the City; and providing analyses and support as requested by the Board of Aldermen and/or the City Administrator.

City Administrator — ***City of Crestwood, Missouri***
2011-2012 — ***1 Detjen Drive***
Crestwood, MO 63126

Acted as first female City Administrator in a City Manager/Mayor/Board of Aldermen form of government in the St. Louis suburban city of nearly 12,000. Oversaw the day to day operations of the full service city (fire, police, public works, parks and recreation). Conducted a comprehensive review of city services

and finances for a city that has lost a substantial part of its retail sales tax base over the last decade with the closing of a regional mall. In light of the City's financial constraints, initiated comprehensive performance management approach to evaluate the necessity of and the performance of city services.

Consultant — ***St. Louis County Municipal League***
2010 2011 — ***121 S. Meramec Avenue***
Clayton, Missouri 63105

As a result of my work for the City of University City and other local municipalities, engaged by the St. Louis County Municipal League to assist local governments in analyzing AmerenUE's proposed electricity rate increase as it relates to municipal street lighting.

Assistant City Manager — ***City of University City, Missouri***
2007 to 2010 — ***6801 Delmar Blvd.***
University City, MO 63130

Reported directly to and assisted the City Manager in all matters within her purview including the research and analysis of city programs and processes, representation at meetings on her behalf, providing information for weekly citizen reports and performing outreach to the community. Took the lead role in the analysis of major programs to enhance revenue and/or reduce costs to the City including:

- evaluated and provided recommendations concerning senior transportation;
- evaluated and devised a comprehensive program for the recovery of the significant debt owed to the City for trash collection;
- evaluated and provided background for performance measurement and management as tools to improve services and decrease costs;
- evaluated and provided a new protocol for enforcement of non-moving traffic violations;
- evaluated and provided recommendations concerning student achievement;
- evaluated and provided recommendations concerning building inspections services.;
- acted City's chief sustainability officer and staff liaison to the Green Practices Commission;
- took the lead role in the City and in the region in the investigation of utility-owned street lights and measures to be taken to reduce costs and energy usage local governments;
- prepared a RFP and plan for new green housing in a distressed area of the City and promoted project to development community;
- represented local governments on the regional **FOCUS-St. Louis** Local Government Sustainability Task Force, lead author of the "Materials (procurement)" component of the report;
- acted as Chairperson of the 100 Year Anniversary of the historic Lions' Gates Commission organizing residents, civic and business leaders for celebratory activities, including a public art project; and
- provided legal advice as needed for various City related matters, including drafting contracts for and with City agencies and community groups; and

Received ***Outstanding Assistant City Manager of the Year*** by the Missouri City Managers Association 2009-2010
Received on behalf of University City the ***Outstanding Local Government Achievement Award for Innovation in Planning and Design*** for the Green Homes Project from East-West Gateway Council of Governments 2010.

Board of Directors and — ***St. Francis Homes Association***
President — ***101 Santa Clara Avenue***
2004-2005 — ***San Francisco, California 94127***
Self-governed Neighborhood of
565 homes and common space

As President, acted as full-time chief operating officer of this 401C4 non-profit community association with an annual operating budget of $800,000 and oversaw the ongoing operations of the various properties owned and that are within the St. Francis Wood historic neighborhood, including but not limited to its parks, parkways, fountains, buildings, monuments, sidewalks and streetscape. These duties include:

- Took the lead role in the Association's significant undertakings, including: initiated small scale contribution (in-kind and donation) campaigns to restore specific historic structures and to actively participate in city-wide initiatives affecting the Association; Contributed to the architectural review and enforcement process of proposed additions and modifications of the historic homes within the Association boundaries;
- Represented the Association in all communications and interactions with homeowners, city officials, local neighborhood organizations, local utilities, vendors to the Association, and Committees that direct the operations of the Association;
- Coordinated and drafted the neighborhood's traffic calming study instituted in conjunction with the City's Livable Streets program and created a community participation process to reach a viable plan;
- Coordinated, planned and lead community meetings concerning topics and issues facing the Association;
- Represented the Association before the local Planning Commission; San Francisco Board of Supervisors and the State; and
- Set forth a process for developing a long range plan for the care and maintenance of the Association's common properties and capital assets.
- Selected for Participation to the National Trust for Historic Preservation Professional Development Training Course in Astoria, Oregon 2004.

Attorney; Representative on Behalf of — ***San Franciscans for Livable Neighborhoods***
St. Francis Homes Association
2004-2005

Took the lead role in preparing the organization's position paper in response to the City of San Francisco's proposed Housing Element to its General Plan before the state agency in charge of approving/disapproving cities' state mandated General Plan components. The organization is a coalition of 16 neighborhoods which sought to participate in the development of the city's General Plan.

Board of Directors and
Chairperson Public Works Committee
2002-2003

St. Francis Homes Association
San Francisco, CA

As chairperson of the Public Works (Sidewalks, Streets and Utilities) Committee, developed a comprehensive evaluation program of the historic sidewalks to minimize repairs to historic materials and design, while providing safe passage for pedestrians. Represented the Homes Association in the evaluation, maintenance, execution and implementation of all contracts for repair and asserted all relevant legal claims associated with over seven miles of privately-owned historic sidewalks. Served as the Association's representative in all communications with the City of San Francisco, contractors, utilities and residents concerning all issues concerning the sidewalks and streets.

Associate Attorney
1991-1997

Armstrong, Teasdale, Schlafly &Davis
Attorneys at Law, St. Louis, MO

Practiced all aspects of complex commercial litigation, including breach of contract and other common law claims, violations of federal and state securities law, federal false claims violations, federal deceptive pricing claims, real estate foreclosure and deficiency claims, and Fair Housing Act claims. Continued assisting the State of Missouri in its desegregation litigation, primarily focusing on the Kansas City school desegregation case, *Jenkins v. State of Missouri, et al*: participated in all strategic litigation decisions, prepared and presented at trial experts in demography and student achievement/testing and assisted in the preparation of legal memoranda regarding the expansion of the magnet school capital improvements and education programs. Acted as the associate representative on the firm's Associates Committee. On partnership tract when relocated to San Francisco with my family in 1997.

Consultant
1988-1991

Attorney General
State of Missouri, St. Louis, MO

While attending law school full time, assisted in the development of the State of Missouri's litigation strategy in the ongoing St. Louis school desegregation case, *Liddell v. Board of Education, et al.* and provided the State the backup fiscal information and other analyses to support its position in the various matters before the Court.

Supervisor, School Finance
1986-1988

Missouri Department of Elementary and
Secondary Education, Jefferson City, MO

Senior Analyst for the State of Missouri's financial obligations in the St. Louis desegregation case, *Liddell v. Board of Education, et al.*: prepared, presented and negotiated the State's position before the Court's Special Master regarding the city and county capital improvements request, magnet school expansion and educational program budgetary requests for FY 87, FY 88 and FY89; monitored $100 million budget and provided forecasts to various state officials and the legislature.

Supervisor, Administrative Services
1985-1986

Missouri Department of Elementary and
Secondary Education, Jefferson City, MO

Analyzed and monitored the State of Missouri's financial obligations in the Kansas City school desegregation case, *Jenkins v. State of Missouri, et al.*; prepared budget forecasts and provided research and assistance in the implementation of the Excellence in Education Act of 1985.

Formal Education

University of California-Berkeley, Berkeley, California
Masters of City and Regional Planning (MCP), December 2002
Emphasis: Land Use

Professional Report (alternative to Thesis) on Behalf of the California State Office of Historic Preservation: ***A Path to Parity: Adopting a Historic Preservation Element to the General Plan*** which is still used today to guide cities in incorporating a Historic Preservation Element to the City's General Plan.

Planning Internship: City of San Rafael Community Development Department, Long Range Planning. January-August 2001. Assisted with the development of the City's Housing Element; evaluated all current housing element programs and completed a comprehensive survey of all new housing units (market rate and affordable) built in San Rafael over the past 5 years.

Saint Louis University School of Law, St. Louis Missouri
J. D. 1991, Cum Laude
Order of the Woolsack (top 10% of class) (rank 17/233)
Best Oralist, Saint Louis University intra-school Moot Court Competition
Member, National Moot Court Team
Academic Achievement Award (Am Jur equivalent): Securities Regulation, Estates Administration

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