May 10, 2012

Mr. Bill Wycko Environmental Review Officer San Francisco Planning Department 1650 Mission Street, 4th Floor San Francisco, CA 94103

Dear Mr. Wycko,

On May 2, 2012, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed 835-845 Jackson Street - Chinese Hospital Replacement Project (Case No. 2008.0762E). After discussion, the HPC arrived at the comments below:

- The HPC understands the seismic requirements and the need for a new hospital in Chinatown. However, the HPC notes that the demolition of the existing 1924 Medical Administration Building (MAB), the original Chinese Hospital Building at 835 Jackson Street, is a significant loss with profound impacts. The proposed project will result in the loss of an individual resource; substantial impacts to an eligible historic district both from the loss of the MAB and from the replacement building and combined with concurrent area projects will have cumulative impacts on historic resources.
- The design of the proposed new hospital is severely lacking and the HPC recommends an
 additional compatible design alternative--one that is between the compatible replacement
 hospital alternative and the proposed project. Such an alternative should not only be
 significantly more compatible with the surrounding historic context but should more fully
 serve the functional needs of the hospital.
- In recognition of the severity of the impacts from the proposed project, the HPC believes that the historic resource mitigation measures for the project are inadequate and propose the following additional measures:
 - Preparation of an update and boundary evaluation of the National Registers of Historic Places/California Register of Historical Resources-eligible Chinatown Historic District. The update to the 1985 District Nomination Report shall be prepared by a Historian who meets the professional qualifications of the Secretary of the Interior's Standards. The update shall include but not be limited to the definition of the district boundaries, statements of architectural and cultural/social significance, local Chinese history documentation, and characterdefining features of the district.

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Planning Information: **415.558.6377** 2. Creation of an outreach and educational program for the community and its stakeholders regarding the historic significance of the district as part of the Chinatown Historic District update.

3. Provide all research and documentation to University of Nevada, Las Vegas Professor of History and Chair of Asian Studies, Sue Fawn Chung and others documenting the history of Chinese and Chinese-American sites in the United States to promote awareness and education of sites, such as the Chinese Hospital

Building.

4. Tracking of other projects with significant cumulative impacts to the eligible Chinatown Historic District (i.e. the proposed 740 Washington Street) in order to allow for coordinated effort to fund the Chinatown Historic District update and

outreach component.

5. Require that the design for the proposed new hospital be presented before the HPC and/or the HPC's Architectural Review Committee (ARC), for review and comment prior to project approval in order to lessen the project's impact on the

eligible historic district.

The HPC appreciates the opportunity to participate in review of the environmental document for the proposed 835-845 Jackson Street - Chinese Hospital Replacement Project (Case No. 2008.0762E).

Sincerely,

Charles Chase, President

Historic Preservation Commission