



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**DATE:** February 11, 2015

**TO:** Historic Preservation Commission

**FROM:** Tim Frye, Preservation Coordinator, (415) 575-6822  
Lisa Gibson, Senior Planner, Environmental Planning (415) 575-9032

**RE:** **Draft Policy Statement Regarding the Development and Evaluation of Preservation Alternatives in Environmental Impact Reports (EIR) for the Purposes of the California Environmental Quality Act (CEQA)**

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## BACKGROUND

At the request of President Hasz and Vice-President Wolfram, the Department is providing the attached draft Resolution outlining recommendations for the development and evaluation of preservation alternatives within EIRs for the purposes of CEQA.

The content outlined in the draft resolution is intended to provide upfront clarification to the Department and project sponsors on a number of reoccurring issues the HPC has identified during its review and comment of past draft EIRs.



# SAN FRANCISCO PLANNING DEPARTMENT

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## Historic Preservation Commission Resolution No.

HEARING DATE: FEBRUARY 18, 2015

ADOPTION OF A POLICY STATEMENT TO CLARIFY HISTORIC PRESERVATION COMMISSION EXPECTATIONS FOR THE DEVELOPMENT AND EVALUATION OF PRESERVATION ALTERNATIVES IN ENVIRONMENTAL IMPACT REPORTS FOR THE PURPOSES OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, the loss of historical resources through demolition or adverse impacts from alteration should be avoided whenever possible and historic preservation should be used as a key strategy in achieving the City's environmental sustainability goals through the restoration, rehabilitation, and adaptive reuse of historic buildings; and

WHEREAS, an environmental impact report (EIR) is required under the California Environmental Quality Act (CEQA) when proposed projects would cause a significant impact to historical resources and is integral to providing the public and decision-makers with an in-depth review of a project's environmental impacts and feasible mitigation measures and alternatives that would reduce or eliminate those impacts; and

WHEREAS, the requirement of CEQA to consider alternatives to projects that would entail significant impacts to historical resources, either through demolition or other alterations, is an opportunity for fair analysis and consideration of the feasibility of accomplishing a desired project while reducing significant environmental impacts to historic resources; and

WHEREAS, the EIR process is the best opportunity for members of the public to participate in the development and consideration of alternatives to demolition and project proposals that would result in significant impacts to historical resources; and

WHEREAS, When an EIR studies a potentially feasible alternative to demolition of an historical resource, the lead agency and the public have the opportunity to discuss and consider changes or alternatives to the project that would reduce or eliminate its impact to historical resources; and

WHEREAS, the Historic Preservation Commission (HPC) has the authority to review and provide comments to the Planning Commission on draft EIRs for projects that would result in a significant impact to an historical resource; and

WHEREAS, the HPC supports the Planning Department's efforts to provide a robust consideration of preservation alternatives in EIRs;

now therefore be it RESOLVED that the Commission hereby ADOPTS the following policy to clarify its expectations for the evaluation of significant impacts to historical resources under CEQA in EIRs under its purview as identified in Section 4.135 of the City Charter:

1. **Preservation Alternatives.** If a proposed project would result in a significant impact on historical resources due to demolition or alteration of an historic structure, the EIR should consider an alternative to the proposed project that would fully preserve the

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features of the structure that convey its historic significance while still meeting most of the basic objectives of the project.

The analysis of historical resources impacts in the EIR should clearly distinguish between impacts to individually significant resources (which should be reviewed for their impact to the building itself) and impacts to contributory resources within a historic district (which should be reviewed for their impacts to the historic district as a whole).

2. **Partial Preservation Alternatives.** The HPC recognizes that preservation options for some project sites and programs may be limited. For this reason, it may be appropriate for the EIR to include analysis of a Partial Preservation Alternative that would preserve as much of the historic fabric of the building as possible while taking into account the feasibility of the proposed alternative and the project objectives.
3. **Labeling of Alternatives.** An alternative should be labeled a "Preservation Alternative" only if it would avoid a significant impact to the historic resource. An alternative that would result in a reduced, but still significant, impact to the historical resource is more appropriately labeled a "Partial Preservation Alternative."
4. **Graphic Materials and Analysis Included in the EIR.** The description of any preservation alternatives should include graphic representations sufficient to illustrate adequately the features of the alternative(s), especially design elements that would avoid or lessen the significant impact to the historic resource. The graphic representations may include floor plans, elevations, sections, and renderings.
5. **Written Analysis Included in the EIR.** The EIR should include an explanation of how the preservation alternative(s) were formulated, as well as other preservation alternatives that were considered but rejected.
6. **Façade Retention.** Façade retention generally constitutes a demolition of a historic resource for the purposes of CEQA and is in conflict with the Secretary of the Interior's Standards; however, in certain circumstances, façade retention may be an effective means to improve the overall design of a proposed project and its relationship to the surrounding context.

Façade retention alone generally would not be an appropriate preservation alternative. The retention of a historic façade is preferable to wholesale demolition when it can be demonstrated that it may improve the overall design of the project. In such limited cases, the EIR should consider mitigation measures or alternatives to the project that would retain the historic façade(s) facing the public right-of-way and incorporate setbacks to allow for an understanding of the overall height and massing. But because façade retention is generally disfavored and often will not, in itself, avoid a significant impact to historical resources under CEQA, it generally should be included in an EIR in addition to the selected preservation alternative or alternatives.

7. **Presentation before the HPC.** During the HPC's hearing to provide review and comment on the draft EIR, the Planning Department shall provide a presentation that outlines the following information:
- a. The eligibility and integrity of those resources identified and under study within the EIR;
  - b. A summary of the potential impacts to the historic resources identified in the EIR; and,
  - c. An explanation of the formulation of the preservation alternative(s) and the potential feasibility of the proposed alternative(s) relative to the project objectives.

I hereby certify that the foregoing Resolution was adopted by the Commission at its meeting on February 18, 2015.

Jonas P. Ionin  
Commission Secretary

AYES:

NAYS:

ABSENT:

ADOPTED: