

Discretionary Review Abbreviated Analysis

HEARING DATE: JUNE 11, 2020

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

Reception:

415.558.6378

Fax:

415.558.6409 Planning

Information: **415.558.6377**

Date: June 4, 2020
Case No.: 2017-013959DRP
Project Address: 178 Sea Cliff Avenue

Permit Application: 2017.1023.1990

Zoning: RH-1-D [Residential House, One-Family-Detached]

40-X Height and Bulk District

Block/Lot: 1306/017 Project Sponsor: Lewis Butler

Butler Armsden Architects

1420 Sutter Street,

San Francisco, CA 94109

Staff Contact: David Winslow – (415) 575-9159

David.Winslow@sfgov.org

Recommendation: Do not take DR and Approve

PROJECT DESCRIPTION

The project includes the demolition of an existing three-story single-family residence with a detached garage and the construction of a new three-story over basement single family residence with a two-car garage at the basement level.

SITE DESCRIPTION AND PRESENT USE

The site is a 42′-6″ wide by approximately 172′-4″ deep 7,226 s.f down sloping lot with an existing 3-story, 3,585 s.f. single-family house built in 1914. The existing house extends shallower into the rear yard than its adjacent neighbors.

SURROUNDING PROPERTIES AND NEIGHBORHOOD

This block of Sea Cliff Avenue has a prevalent pattern of two- and three-story houses with front and side setbacks. The architecture and building forms are an eclectic mix that range from Mediterranean style with gentle sloping clay tiled roofs to simple form revival style buildings detailed with quoins and flat roofs with cornices. Stucco is the predominant material. The rear of the buildings on this block face Baker Beach and the outer bay. The alignment of the buildings at the rear is somewhat inconsistent, with different levels terracing to varying depths.

BUILDING PERMIT NOTIFICATION

| ТҮРЕ | REQUIRED PERIOD | NOTIFICATION DATES | DR FILE DATE | DR HEARING DATE | FILING TO HEARING TIME |
|---------------|-----------------|--|--------------|-----------------|------------------------|
| 311 Notice | 30 days | December 31, 2019 – January 30, 2020 | 1.28. 2020 | 6.11. 2020 | 135 days |

HEARING NOTIFICATION

| ТҮРЕ | REQUIRED PERIOD | REQUIRED NOTICE DATE | ACTUAL NOTICE DATE | ACTUAL PERIOD |
|---------------|--------------------|----------------------|--------------------|------------------|
| Posted Notice | 20 days | May 29, 2020 | May 29, 2020 | 20 days |
| Mailed Notice | 20 days | May 29, 2020 | May 29, 2020 | 20 days |
| Online Notice | 20 days | May 29, 2020 | May 29, 2020 | 20 days |

PUBLIC COMMENT

| | SUPPORT | OPPOSED | NO POSITION |
|--------------------------|---------|---------|-------------|
| Adjacent neighbor(s) | 0 | 0 | 0 |
| Other neighbors on the | | | |
| block or directly across | 0 | 0 | 0 |
| the street | | | |
| Neighborhood groups | 0 | 1 | 0 |

DR REQUESTOR

Mountain Lake Properties, 164 Sea Cliff Avenue, neighbor to the East of the proposed project.

DR REQUESTOR'S CONCERNS AND PROPOSED ALTERNATIVES

The proposed design:

- 1. Is incompatible with the traditional design elements of the surrounding eligible Sea Cliff Historic District;
- 2. Is out of scale with other buildings in the area and;
- 3. Impacts light, privacy and views of the Golden Gate Bridge and Baker Beach from adjacent properties;

Their proposed alternatives include:

- 1. Respect setbacks per Planning Code Sections 133 and 134 for front and side setbacks;
- 2. Reduce expansion to rear and;
- 3. Incorporate traditional design composition and elements.

See attached Discretionary Review Application, dated January 28, 020.

SAN FRANCISCO
PLANNING DEPARTMENT

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PROJECT SPONSOR'S RESPONSE TO DR APPLICATION

The project complies with the Planning Code and the Residential Design Guidelines related to building height, massing, and scale at the street and is compatible with the forms and features of the surrounding buildings. Ample setbacks and lot sizes of this and neighboring properties enable plenty of space to preserve light privacy.

See attached Response to Discretionary Review, dated May 28, 2020.

ENVIRONMENTAL REVIEW

The Department has determined that the proposed project is exempt/excluded from environmental review, pursuant to CEQA Guideline Section 15303 (Class 3 – New Construction. Up to three new single-family residences or six dwelling units in one building.

DEPARTMENTAL REVIEW

The demolition of the existing building was reviewed for its impacts to the Sea Cliff California Registereligible Historic District, which is characterized by its bluff-top location in the Sea Cliff neighborhood comprised of two- to three-story buildings with side setbacks and landscaped front setbacks.

Many of the buildings employ Mediterranean Revival style features including stucco cladding, gabled and hipped roofs with Spanish clay tiles, and exterior chimney.

Others include rich eclectic revival detailing such as faux quoins, wood shutters, cartouches and balconettes; and multi-light wood-sash windows, often with arched openings

The existing building is categorized as an 'A' resource as a contributor to the eligible Seacliff Historic District, and its removal was determined to not result in a cumulative impact to the integrity of the district.

Considering the DR request, this project was re-reviewed by Residential Design Advisory Team and confirmed that the proposed design complies the Residential Design Guidelines.

Specifically:

- 1. The siting of the building is consistent with the front and side and rear setbacks of the surrounding buildings and is Code-complaint.
- 2. The three-story massing at the street is consistent with other buildings on this block.
- 3. The building massing and siting at the rear maintains light and visual access to the common open space from adjacent properties; (Views are not protected.)
- 4. The application of Residential Design Guidelines is intended to result in designs that are compatible with the patterns of existing context, not to necessarily imitate or recreate previous historical styles. As such the massing, composition, materials, proportions and details are a modern and compatible fit with the family other buildings in the surroundings.

Therefore, staff deems there are no exceptional or extraordinary circumstances and recommends not taking Discretionary Review and approving as proposed.

RECOMMENDATION: Do not take DR and Approve

SAN FRANCISCO
PLANNING DEPARTMENT

Discretionary Review – Abbreviated Analysis June 11, 2020

CASE NO. 2017-013959DRP 178 Sea Cliff Avenue

Attachments:

Block Book Map Sanborn Map

Zoning Map

Aerial Photographs

Context Photographs

Section 311 Notice

CEQA Determination

HRE

DR Application and exhibits

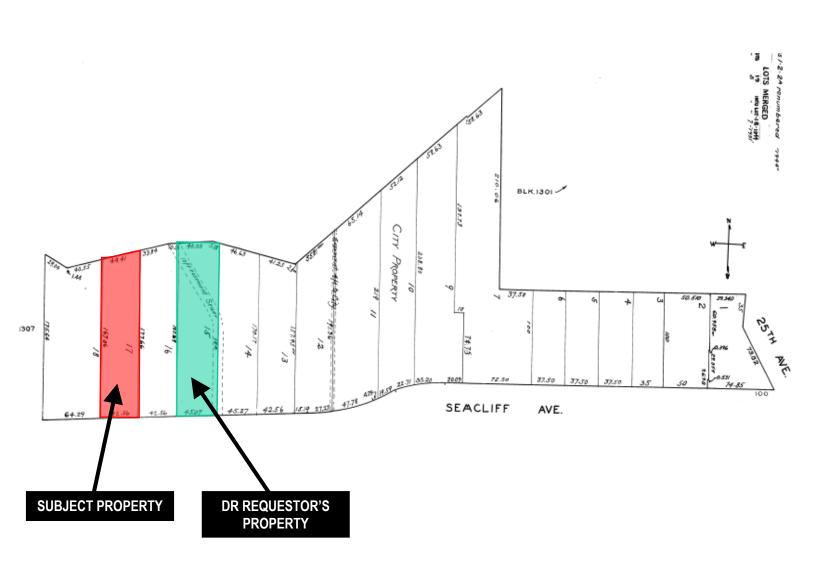
Letters

Response to DR Application dated May 28, 2020

Reduced Plans

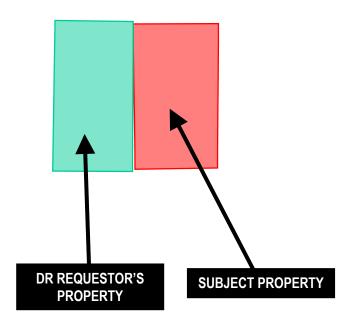
Exhibits

Parcel Map

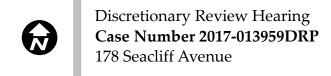




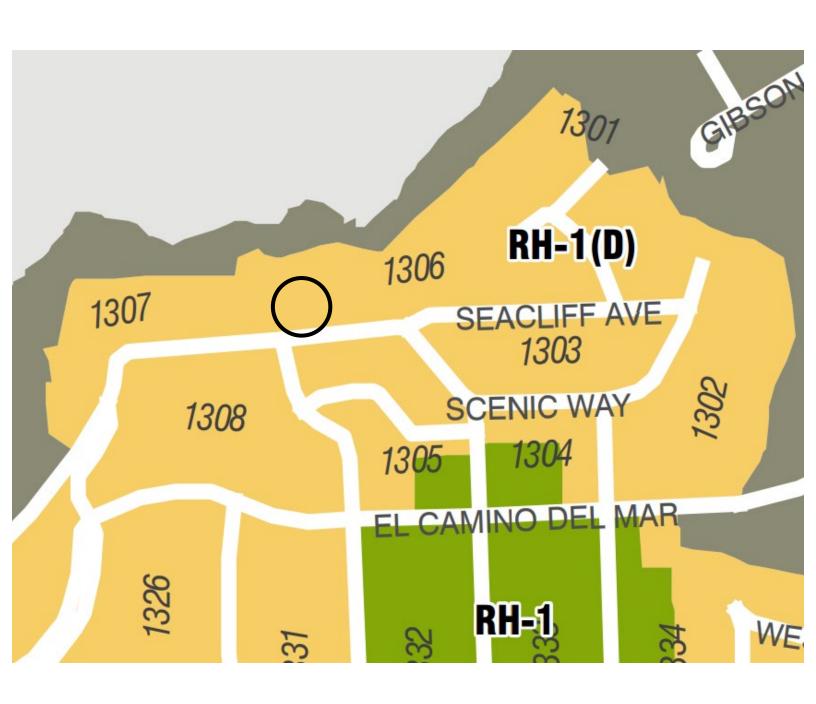
Sanborn Map*

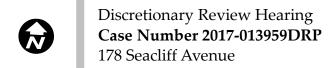


*The Sanborn Maps in San Francisco have not been updated since 1998, and this map may not accurately reflect existing conditions.



Zoning Map







SUBJECT PROPERTY

DR REQUESTOR'S PROPERTY





SUBJECT PROPERTY

DR REQUESTOR'S PROPERTY





DR REQUESTOR'S PROPERTY

SUBJECT PROPERTY



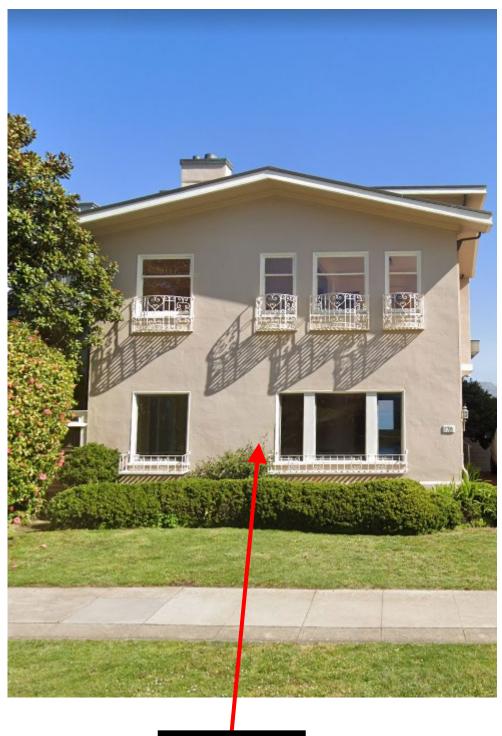


DR REQUESTOR'S PROPERTY

SUBJECT PROPERTY



Site Photo



SUBJECT PROPERTY

1650 Mission Street Suite 400 San Francisco, CA 94103

NOTICE OF BUILDING PERMIT APPLICATION (SECTION 311)

On October 23, 2017, Building Permit Application No. 201710231990 was filed for work at the Project Address below.

Notice Date: December 31, 2019 Expiration Date: January 30, 2020

| PROJECT INFORMATION | | APPL | APPLICANT INFORMATION | |
|---------------------|----------------------|--------------|---------------------------------|--|
| Project Address: | 178 Seacliff Avenue | Applicant: | Lewis Butler | |
| Cross Street(s): | 26th and 27th Avenue | Address: | 1420 Sutter Street, First Floor | |
| Block/Lot No.: | 1306/017 | City, State: | San Francisco, CA | |
| Zoning District(s): | RH-1(D)/40-X | Telephone: | (415) 674-5554 | |
| Record Number: | 2017-013959PRJ | Email: | butler@butlerarmsden.com | |

You are receiving this notice as an owner or occupant of property within 150 feet of the proposed project. **You are not required to take any action.** For more information about the proposed project, or to express concerns about the project, please contact the Applicant listed above or the Planner named below as soon as possible. If you believe that there are exceptional or extraordinary circumstances associated with the project, you may request that the Planning Commission review this application at a public hearing for Discretionary Review. Requests for a Discretionary Review hearing must be filed during the 30-day review period, prior to the close of business on the Expiration Date shown above, or the next business day if that date is on a week-end or a legal holiday. If no Requests for Discretionary Review are filed, this project will be approved by the Planning Department after the Expiration Date.

Members of the public are not required to provide personal identifying information when they communicate with the Commission or the Department. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the Department's website or in other public documents.

| PROJECT SCOPE | | | | |
|--------------------------|------------------------|--|--|--|
| ☑ Demolition | ☑ New Construction | ☐ Alteration | | |
| ☐ Change of Use | ☐ Façade Alteration(s) | ☐ Front Addition | | |
| ☐ Rear Addition | ☐ Side Addition | ☐ Vertical Addition | | |
| PROJECT FEATURES | EXISTING | PROPOSED | | |
| Building Use | Residential | No change | | |
| Front Setback | ± 18'-4 ¾" | ± 16'-81/2" | | |
| Side Setback - East | ± 10'-9" | ± 11'-4" (first floor) 8'-6" (2 nd and 3 rd floor) | | |
| Side Setback – West | ± 3'-10" | ± 0 | | |
| Building Depth | ± 53'-3 1/4" | ± 86'- 1/8" | | |
| Rear Yard | ± 104'-1" | ± 71'-4½" | | |
| Building Height | ± 30'-4" | ± 30'-0" | | |
| Number of Stories | 3 over basement | No change | | |
| Number of Dwelling Units | 1 | No change | | |
| Number of Parking Spaces | 1 | No change | | |
| PROJECT DESCRIPTION | | | | |

The project includes the demolition of an existing single family residence with a detached garage and the construction of a new three-story over basement single family residence with a two-car garage at the basement level.

The issuance of the building permit by the Department of Building Inspection or the Planning Commission project approval at a discretionary review hearing would constitute as the Approval Action for the project for the purposes of CEQA, pursuant to Section 31.04(h) of the San Francisco Administrative Code

To view plans or related documents, visit <u>sf-planning.org/notices</u> and search the Project Address listed above. Once the property is located, click on the dot(s) to view details of the record number above, its related documents and/or plans.

For more information, please contact Planning Department staff:

Sylvia Jimenez, 415-575-9187, Sylvia.Jimenez@sfgov.org

CEQA Categorical Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

| Project Address | | | Block/Lot(s) | | |
|---------------------------|--|--|---|--|--|
| 178 SEACLIFF AVE | | | 1306017 | | |
| Case No. | | | Permit No. | | |
| 2017-013959ENV | | | 201710231990 | | |
| _ | dition/ eration | Demolition (requires HRE for Category B Building) | New Construction | | |
| Lot #1 three- Const | Project description for Planning Department approval. Lot #1306/017 located between 26th Avenue and 27th Avenue. Parcel area 7,325 sq. ft. Demolish existing three-story, 3,747-square-foot, 30-foot-high, single-family residence over basement and detached garage. Construct new three-story, 8,011-square-foot, 30-foot-high, single-family residence over basement. Increase parking spaces from one to three. Excavation of 1,600 square feet to a depth of 15.5 feet, 950 cubic yards. | | | | |
| | | | | | |
| The p | - | ON CLASS etermined to be categorically exempt under the | California Environmental Quality | | |
| The p | project has been d CEQA). | | | | |
| The p | oroject has been d CEQA). Class 1 - Existin Class 3 - New C | g Facilities. Interior and exterior alterations; addit onstruction. Up to three new single-family resider reial/office structures; utility extensions; change of | ions under 10,000 sq. ft. nces or six dwelling units in one | | |
| The p | Class 1 - Existin Class 3 - New Commented or with Class 32 - In-Fill 10,000 sq. ft. and (a) The project is policies as well a (b) The proposed substantially surrous (c) The project s (d) Approval of the water quality. (e) The site can | g Facilities. Interior and exterior alterations; addit onstruction. Up to three new single-family resider reial/office structures; utility extensions; change of | ions under 10,000 sq. ft. Inces or six dwelling units in one use under 10,000 sq. ft. if principally The units or additions greater than Ination and all applicable general plantons. It site of no more than 5 acres It threatened species. Is relating to traffic, noise, air quality, or | | |

STEP 2: CEQA IMPACTS

TO BE COMPLETED BY PROJECT PLANNER

| | Air Quality: Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities within an Air Pollution Exposure Zone? Does the project have the potential to emit substantial pollutant concentrations (e.g., backup diesel generators, heavy industry, diesel trucks, etc.)? (refer to EP _ArcMap > CEQA Catex Determination Layers > Air Pollution Exposure Zone) |
|------|---|
| | Hazardous Materials: If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? |
| | if the applicant presents documentation of enrollment in the San Francisco Department of Public Health (DPH) Maher program, a DPH waiver from the Maher program, or other documentation from Environmental Planning staff that hazardous material effects would be less than significant (refer to EP_ArcMap > Maher layer). |
| | Transportation: Does the project involve a child care facility or school with 30 or more students, or a location 1,500 sq. ft. or greater? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities? |
| | Archeological Resources: Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non-archeological sensitive area? If yes, archeo review is required (refer to EP_ArcMap > CEQA Catex Determination Layers > Archeological Sensitive Area) |
| | Subdivision/Lot Line Adjustment: Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? (refer to EP_ArcMap > CEQA Catex Determination Layers > Topography). If yes, Environmental Planning must issue the exemption. |
| | Slope = or > 25%: Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (refer to EP_ArcMap > CEQA Catex Determination Layers > Topography) If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption. |
| | Seismic: Landslide Zone: Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones) If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption. |
| | Seismic: Liquefaction Zone: Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones) If box is checked, a geotechnical report will likely be required and Environmental Planning must issue the exemption. |
| Com | ments and Planner Signature (optional): Diane Livia |
| PLEA | ASE SEE ATTACHED |
| | |

STEP 3: PROPERTY STATUS - HISTORIC RESOURCE TO BE COMPLETED BY PROJECT PLANNER PROPERTY IS ONE OF THE FOLLOWING: (refer to Property Information Map) Category A: Known Historical Resource. GO TO STEP 5. Category B: Potential Historical Resource (over 45 years of age). GO TO STEP 4. Category C: Not a Historical Resource or Not Age Eligible (under 45 years of age). GO TO STEP 6. STEP 4: PROPOSED WORK CHECKLIST TO BE COMPLETED BY PROJECT PLANNER Check all that apply to the project. 1. Change of use and new construction. Tenant improvements not included. 2. Regular maintenance or repair to correct or repair deterioration, decay, or damage to building. 3. Window replacement that meets the Department's Window Replacement Standards. Does not include storefront window alterations. 4. Garage work. A new opening that meets the Guidelines for Adding Garages and Curb Cuts, and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines. 5. Deck, terrace construction, or fences not visible from any immediately adjacent public right-of-way. 6. Mechanical equipment installation that is not visible from any immediately adjacent public right-of-way. 7. Dormer installation that meets the requirements for exemption from public notification under Zoning Administrator Bulletin No. 3: Dormer Windows. 8. Addition(s) that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features. Note: Project Planner must check box below before proceeding. Project is not listed. GO TO STEP 5. Project does not conform to the scopes of work. GO TO STEP 5. Project involves four or more work descriptions. GO TO STEP 5. Project involves less than four work descriptions. GO TO STEP 6. STEP 5: CEQA IMPACTS - ADVANCED HISTORICAL REVIEW TO BE COMPLETED BY PROJECT PLANNER

| | 10 22 00 12 12 21 1 100 12 1 1 2 1 1 1 1 1 1 1 1 | | | |
|------|--|--|--|--|
| Chec | k all that apply to the project. | | | |
| | 1. Project involves a known historical resource (CEQA Category A) as determined by Step 3 and conforms entirely to proposed work checklist in Step 4. | | | |
| | 2. Interior alterations to publicly accessible spaces. | | | |
| | 3. Window replacement of original/historic windows that are not "in-kind" but are consistent with existing historic character. | | | |
| | 4. Façade/storefront alterations that do not remove, alter, or obscure character-defining features. | | | |
| | 5. Raising the building in a manner that does not remove, alter, or obscure character-defining features. | | | |
| | 6. Restoration based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings. | | | |

| | 7. Addition(s) , including mechanical equipment that are minimally visible from a public right-of-way and meet the <i>Secretary of the Interior's Standards for Rehabilitation</i> . | | | |
|--------|---|---|--|--|
| | 8. Other work consistent with the Secretary of the Interior Stand Properties (specify or add comments): | lards for the Treatment of Historic | | |
| | 9. Other work that would not materially impair a historic district (s | specify or add comments): | | |
| | See HRER Part II dated 11.4.19. Staff finds that the demolition of the proposed project would not result in a cumulative impact to the Historic District. Although the design of the project will not be conwith nearby historic resources, the physical separation between n (Requires approval by Senior Preservation Planner/Preservation) | ne California Register-eligible Sea Cliff npatible in massing, materials or details new construction and such resources | | |
| | 10. Reclassification of property status . (Requires approval by S | Senior Preservation | | |
| | Reclassify to Category A | Reclassify to Category C | | |
| | a. Per HRER or PTR dated | (attach HRER or PTR) | | |
| | b. Other (specify): | | | |
| | Note: If ANY box in STEP 5 above is checked, a Prese | rvation Planner MUST sign below. | | |
| | Project can proceed with categorical exemption review. The p Preservation Planner and can proceed with categorical exemptio | | | |
| Comm | ents (optional): | | | |
| Preser | vation Planner Signature: Michelle A Taylor | | | |
| STE | EP 6: CATEGORICAL EXEMPTION DETERMINATION BE COMPLETED BY PROJECT PLANNER | | | |
| | No further environmental review is required. The project is car There are no unusual circumstances that would result in a rea effect. | | | |
| | Project Approval Action: | Signature: | | |
| | Building Permit | Diane Livia | | |
| | If Discretionary Review before the Planning Commission is requested, the Discretionary Review hearing is the Approval Action for the project. | 11/20/2019 | | |
| | Once signed or stamped and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter 31of the Administrative Code. In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination can only be | | | |

Please note that other approval actions may be required for the project. Please contact the assigned planner for these approvals.

filed within 30 days of the project receiving the approval action.

CEQA Impacts

Hazardous Materials: Application to Maher complete, signed waiver submitted.

Archeology: Preliminary archeological review completed by department staff dated April 24, 2018.

Slope: Geotechnical report submitted dated August 7, 2017.

Seismic-Landslide: Geotechnical report submitted dated August 7, 2017.

Noise: The project would use typical construction equipment that would be regulated by Article 29 of the Police Code (section 2907, Construction Equipment). No impact pile driving or nighttime construction is required. Construction vibration would not be anticipated to affect adjacent buildings. The proposed project would not generate sufficient vehicle trips to noticeably increase ambient noise levels, and the project's fixed noise sources, such as heating, ventilation, and air conditioning systems, would be subject to noise limits in Article 29 of the Police Code (section 2909, Noise Limits).

Air Quality: The proposed project's construction would be subject to the Dust Control Ordinance (Article 22B of the Health Code). The proposed land uses are below the Bay Area Air Quality Management District's construction and operational screening levels for requiring further quantitative criteria air pollutant analysis. The project site is not located within an air pollutant exposure zone.

Water Quality: The project's construction activities are required to comply with the Construction Site Runoff Ordinance (Public Works Code, article 2.4, section 146).

Natural Habitat: The project site is paved and within a developed urban area. The project site has no significant riparian corridors, estuaries, marshes, wetlands, or any other potential wildlife habitat that might contain endangered, rare or threatened species. Thus, the project site has no value as habitat for rare, threatened, or endangered species.

The proposed project would be designed to incorporate water efficient fixtures as required by Title 24 of the California Code of Regulations and the City's Green Building Ordinance. The project's water supply demand would constitute a negligible increase relative to the existing and projected water supply demand for the city as a whole and is accounted for in the SFPUC's Urban Water Management Plan, which addresses water demand and supply through 2040. As such, sufficient water supplies are available to serve the proposed project in normal, dry, and multiple dry years, and the proposed project would not require or result in the relocation or construction of new or expanded water facilities the construction or relocation of which could cause significant environmental effects.

STEP 7: MODIFICATION OF A CEQA EXEMPT PROJECT

TO BE COMPLETED BY PROJECT PLANNER

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

PROPERTY INFORMATION/PROJECT DESCRIPTION

| Project Address (If different than front page) | | | Block/Lot(s) (If different than front page) | | |
|--|--|---|---|--|--|
| 178 S | SEACLIFF AVE | | 1306/017 | | |
| Case | No. | Previous Building Permit No. | New Building Permit No. | | |
| 2017- | 013959PRJ | 201710231990 | | | |
| Plans | s Dated | Previous Approval Action | New Approval Action | | |
| | | Building Permit | | | |
| | fied Project Description: | CONSTITUTES SUBSTANTIAL MODIS | ICATION | | |
| | | CONSTITUTES SUBSTANTIAL MODIF | ICATION | | |
| Com | pared to the approved project, w | ould the modified project: | | | |
| | Result in expansion of the buil | ding envelope, as defined in the Planning (| Code; | | |
| | Result in the change of use that would require public notice under Planning Code Sections 311 or 312; | | | | |
| | Result in demolition as defined | d under Planning Code Section 317 or 1900 | 05(f)? | | |
| | Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption? | | | | |
| If at I | east one of the above boxes is | checked, further environmental review i | s required. | | |
| DET | ERMINATION OF NO SUBSTA | | | | |
| | | uld not result in any of the above changes. | | | |
| If this box is checked, the proposed modifications are categorically exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice. In accordance with Chapter 31, Sec 31.08j of the San Francisco Administrative Code, an appeal of this determination can be filed within 10 days of posting of this determination. | | | | | |
| Plani | ner Name: | Date: | | | |
| | | | | | |



178 SEA CLIFF AVENUE HISTORIC RESOURCE EVALUATION

SAN FRANCISCO, CALIFORNIA [15119]

PREPRARED FOR: REUBEN, JUNIUS & ROSE

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I. INTRODUCTION

This Historic Resource Evaluation (HRE) has been prepared at the request of Reuben, Junius & Rose for the residence at 178 Sea Cliff Avenue (APN 1306/017) in San Francisco's Sea Cliff neighborhood. The house was designed by architect Edward G. Bolles in 1914 for original owner Eminal. P. Halsted. The house is located on a rectangular lot which extends north to a cliff, beyond which is Baker Beach and the Pacific Ocean (**Figure 1**). The lot is generally level with a slight downward slope to the north, and the building remains in use as a private residence in a RH-1(D) zoning district.



Figure 1: Aerial view of 178 Sea Cliff Avenue, indicated by red rectangle, facing north. Source: Bing Maps, edited by author.

178 Sea Cliff Avenue is not listed in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), or local San Francisco historical register. The subject property is located within the boundaries, however, of the Sea Cliff Historic District, considered a potential California Register-eligible historic district by the San Francisco Planning Department.

METHODOLOGY

This report follows the outline provided by the San Francisco Planning Department for Historic Resource Evaluation Reports, and provides a building description, historic context, and an examination of the current historic status for the building at 178 Sea Cliff Avenue. The report also includes an evaluation of the property's eligibility for listing in the California Register, both individually and as part of a district.

Page & Turnbull prepared this report using research collected at various local repositories, including the San Francisco Assessor's Office, the San Francisco Department of Building Inspection, and the San Francisco Public Library History Center, as well as various online sources including www.ancestry.com and the California Digital Newspaper Collection. Key primary sources consulted and cited in this report include Sanborn Fire Insurance Company maps, City of San Francisco

Building Permit Applications, San Francisco City Directories, Assessor's Office records, and historical newspapers.

As the subject property is located within the potential Sea Cliff Historic District (the boundaries of which are defined on the online Property Information Map), Page & Turnbull reviewed publicly-available Historic Resource Evaluation Response (HRER) and Preservation Team Review Form documents, completed by the San Francisco Planning Department for other properties within the Sea Cliff neighborhood. Nine such documents were reviewed in order to understand the potential district's proposed period of significance and applicable significance criteria.

All photographs in this report were taken by Page & Turnbull in May 2015 unless otherwise noted.

SUMMARY OF FINDINGS

178 Sea Cliff Avenue was constructed in 1914 in the newly platted Sea Cliff Subdivision #1. It was designed by architect Edward G. Bolles, and the sale of the house was facilitated by the S. A. Born Building Company, the primary developer of Sea Cliff. The first owner, Eminal P. Halsted, was the operator of his family funeral business, placing him in the upper-middle class, a group to whom the Sea Cliff subdivision was specifically marketed. 178 Sea Cliff Avenue is not individually significant for its architecture, which is a simplified hybrid of several styles and one of the less distinctive residential works of Edward G. Bolles. Nor is it individually significant for any association with an event, pattern of events, or persons. However, in a preliminary consideration of the potentially eligible Sea Cliff Historic District, it appears that 178 Sea Cliff Avenue would be considered a district contributor due to its date of construction, developer, and intact historic integrity.

For this reason, 178 Sea Cliff Avenue **does qualify as a historic resource** for the purposes of review under the California Environmental Quality Act (CEQA).

II. EXISTING HISTORIC STATUS

The following section examines the national, state, and local historical ratings currently assigned to the residence at 178 Sea Cliff Avenue.

NATIONAL REGISTER OF HISTORIC PLACES

The National Register of Historic Places (National Register) is the nation's most comprehensive inventory of historic resources. The National Register is administered by the National Park Service and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

178 Sea Cliff Avenue is not currently listed in the National Register of Historic Places.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.

178 Sea Cliff Avenue is not currently listed in the California Register of Historical Resources.

SAN FRANCISCO CITY LANDMARKS

San Francisco City Landmarks are buildings, properties, structures, sites, districts, and objects of "special character or special historical, architectural or aesthetic interest or value and are an important part of the City's historical and architectural heritage." Adopted in 1967 as Article 10 of the City Planning Code, the San Francisco City Landmark program protects listed buildings from inappropriate alterations and demolitions through review by the San Francisco Historic Preservation Commission. These properties are important to the city's history and help to provide significant and unique examples of the past that are irreplaceable. In addition, these landmarks help to protect the surrounding neighborhood development and enhance the educational and cultural dimension of the city.

178 Sea Cliff Avenue is not currently designated as a San Francisco City Landmark or Structure of Merit. Furthermore, 178 Sea Cliff Avenue does not fall within the boundaries of any locally-designated historic districts or conservation districts, and does not appear to have been included in any local historic resource surveys.

CALIFORNIA HISTORICAL RESOURCE STATUS CODE

Properties listed or under review by the State of California Office of Historic Preservation are assigned a California Historical Resource Status Code (Status Code) of "1" to "7" to establish their historical significance in relation to the National Register of Historic Places (National Register or NR) or California Register of Historical Resources (California Register or CR). Properties with a Status Code of "1" or "2" are either eligible for listing in the California Register or the National Register, or are already listed in one or both of the registers. Properties assigned Status Codes of "3"

¹ San Francisco Planning Department, *Preservation Bulletin No. 9 – Landmarks.* (San Francisco, CA: January 2003).

or "4" appear to be eligible for listing in either register, but normally require more research to support this rating. Properties assigned a Status Code of "5" have typically been determined to be locally significant or to have contextual importance. Properties with a Status Code of "6" are not eligible for listing in either register. Finally, a Status Code of "7" means that the resource has not been evaluated for the National Register or the California Register, or needs reevaluation.

As of 2015, 178 Sea Cliff Avenue was not listed in the California Historic Resources Information System (CHRIS) database with any status code.

1976 DEPARTMENT OF CITY PLANNING ARCHITECTURAL QUALITY SURVEY

The 1976 Department of City Planning Architectural Quality Survey (1976 DCP Survey) is what is referred to in preservation parlance as a "reconnaissance" or "windshield" survey. The survey looked at the entire City and County of San Francisco to identify and rate architecturally significant buildings and structures on a scale of "-2" (detrimental) to "+5" (extraordinary). No research was performed and the potential historical significance of a resource was not considered when a rating was assigned. Buildings rated "3" or higher in the survey represent approximately the top two percent of San Francisco's building stock in terms of architectural significance. However, it should be noted here that the 1976 DCP Survey has come under increasing scrutiny over the past decade due to the fact that it has not been updated in over twenty-five years. As a result, the 1976 DCP Survey has not been officially recognized by the San Francisco Planning Department as a valid local register of historic resources for the purposes of the California Environmental Quality Act (CEQA).

178 Sea Cliff Avenue is not listed in the 1976 DCP Survey.

III. BUILDING AND PROPERTY DESCRIPTION

178 Sea Cliff is a three story over slightly exposed basement rectangular-plan wood frame house clad in stucco and capped with a multi-form roof (**Figure 2**). Although the property faces south onto Sea Cliff Avenue, the primary entrance is located on the east façade. The house was constructed in 1914 and includes Arts and Crafts, Prairie, and Craftsman design elements. A detached garage is located at the rear (northeast) of the lot, accessed by a brick-paved driveway. The back yard is landscaped, and abuts a steep cliff at the north, beyond which is Baker Beach and the Pacific Ocean.



Figure 2: South and east facades, facing northwest.

Primary (South) Façade

The primary (south) façade of the building faces on to Sea Cliff Avenue and includes two stories over a raised water table, with a significantly recessed third story (**Figure 3**). Windows at the first and second story are asymmetrically arranged aluminum-frame fixed pane windows with wood trim and cast iron elements that appear to be original to the residence: flower boxes on the first story and decorative balconies on the second story. At the first story, at left there is a single window, and at right there is a large tripartite window; these windows replaced the original wood-sash windows at this location. At the second story, there are four wood sash cottage windows with ogee lugs, generally aligned with the window openings below. The façade terminates in deeply overhanging wood eaves and metal coping with a low pitch gable roof. The third story is recessed significantly and only partially visible from the street, and has one centered, double hung wood sash window. The third story terminates in overhanging wood eaves, metal coping and a flat roof.

To the left of the primary façade, there is a wood paneled privacy door below a narrow transom, which leads to a narrow paved side yard to the west of the house. The west perimeter of the front yard is marked by a low stucco-clad concrete wall, with fixed pane windows set in a wooden architrave with wooden pilasters at intervals.



Figure 3: South façade with privacy door to left and driveway at right, facing northwest.

East Façade

The east façade has three distinct massed elements: the first, at left, is two stories, the remaining two, at center and right, are each three stories (**Figure 4**). The water-table is continued around from the south façade,. The first mass at left has no openings on the first story, and a tripartite wood-sash cottage window group at the second story. This left mass terminates in deep overhanging wood eaves and metal coping with a low pitch gable roof.



Figure 4: East façade, facing northwest.

The central mass contains the primary entrance at the first story and a cantilevered central bay at the upper stories (**Figure 5**). The primary entrance is recessed and located through a segmental arch and up two brick steps (**Figure 6**). The wood paneled door has sidelights which have decorative wrought

iron panels. A copper mail slot is located below the left sidelight. The second and third story projection has decorative carved wooden brackets under the cantilevered base. The second story contains two paired six light wood frame windows topped with a partitioned segmental arched transom window. This pair of windows has a narrow wood faux balcony. The third story is delineated with a projecting stucco belt course and has three wood sash cottage windows. The central mass terminates in a deep overhanging wood eave and flat roof.



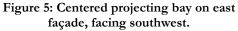




Figure 6: Primary entrance, facing west.

The third mass, at right, contains a small wood frame window on the basement level, covered with a decorative iron grate. The first story has a wood sash cottage window, also covered with a security iron grate (**Figure 7**). The second story contains one wood sash cottage window. The third story is delineated with a projecting stucco belt course which continues from the center mass, and has a wood sash cottage window at far right that is not aligned with the windows below. The right mass terminates in a deep overhanging wood eave and flat roof.



Figure 7: Lower right of east façade, facing northwest.

Right (north) of the east façade, a wood privacy door with a transom connects the house to the garage and provides access to the backyard from the driveway.

West Facade

The west façade faces onto a narrow paved walkway, which is accessed via the wood privacy door at the south (previously described) and a wood privacy door at the north (Figure 8). The partially exposed basement level includes four wood frame openings at the center and rear of the facade: two are covered vents and two are fixed frame windows with decorative iron grates (Figure 9). The windows along the first story include, from left to right, two wood frame horizontal awning windows, a tripartite aluminum frame window with sliding outer panes, a vinyl two pane sliding door with an exterior screen, accessed via a short wooden stair and platform, and a wood sash cottage window (Figure 10, also see Figure 8). The awning windows on the first story flank the chimney and have been covered on the interior. The second story includes four wood sash cottage windows, the center two having Minster glass. The third story is only located at the center and rear (north) of the house. This story includes a wood sash cottage window at far left, a two pane aluminum sash sliding window with a screen at center, and wood sash cottage window with Minster glass at right. The rear and center portions of the façade terminate above the third story with an overhanging wood eave and metal coping and are capped by a flat roof. The two-story portion of the west façade towards the front of the house terminates in wooden eaves and is capped by a low-pitch gable roof.



Figure 8: Northern portion of the west façade, facing north.



Figure 9: Partially exposed basement along the west façade, facing southeast.



Figure 10: Southern portion of the west façade, facing south.

Rear (North) Façade

The north façade faces onto the rear yard and the Pacific Ocean beyond, and includes three full stories and the partially exposed basement. Overall, the façade is aligned in two unequal bays, with a broad left bay and a narrow right bay (Figure 11). The basement is accessed via a concrete enclosure with a short stair and a wood door at right (Figure 12). Centered along the basement level, there is a two paned wood frame awning window flanked by two small metal vents. At the first story, the left bay contains three large fixed wood frame windows, and the right bay contains a wood sash cottage window. At the second story, the left bay includes a large aluminum frame sliding door flanked by fixed aluminum frame windows. The door opens onto a porch, supported by painted steel posts, with a metal railing with glass panels. Fenestration at this bay and the porch appear to be alterations to the building's original design. At the right bay there is a very small single-hung wood frame window. The third story is marked by a belt course, and includes three window bays which are not aligned with the lower story bays. At left there is a large vinyl sash cottage window, at center there is a fixed wood frame picture window, and at right there is a large vinyl sash cottage window. The façade terminates with a deep overhanging wood eave and metal coping.



Figure 11: North façade and garden, facing south.



Figure 12: Subgrade basement entrance on the north façade, facing south.

GARAGE

The garage is located to the north and east of the house (**Figure 13**). The garage was designed by August Nordin and constructed in 1916. The garage is constructed of concrete and wood, and has a

contemporary wood paneled roll-up door and shares a surround with the adjacent property. The surround includes a multi-lite transom and a curvilinear trellis cap, which appears to be original to the residence. The west façade of the garage faces the garden, and consists of nine wood frame fixed Minster windows (**Figure 14**). The north façade of the garage also has Minster glass windows which are overgrown with garden vegetation. The garage has wood brackets and a flat roof.



Figure 13: Front entrance of the garage, facing north.



Figure 14: West façade of the garage, facing east.

GROUNDS

The grounds of the property include hedges, flowering bushes, small trees, and lawns. The front yard is landscaped with a lawn and a low hedge close to the front (south) façade (see **Figure 3**). There is also a large camellia bush at the southwest corner of the property. The rear garden is located north of the house, with views to Baker Beach and the Golden Gate Bridge (**Figure 15**). The garden consists

of landscape features including terraced walkways, curvilinear planting beds, a rock wall, a pond, and a concrete balustrade at the northern perimeter (**Figure 16**).



Figure 15: View from the garden, facing northeast.



Figure 16: View of the garden from the 2nd story porch, facing north.

SURROUNDING NEIGHBORHOOD

178 Sea Cliff Avenue is located in a uniformly residential neighborhood. Buildings are predominantly single-family residences, constructed between the 1910s and the current day. Houses are sited and designed to take advantage of views towards the north of the Golden Gate and the Pacific Ocean. The area is arranged along its original street plan, laid out between 1913 and 1928, which includes a mix of the extended north-south grid of the numbered streets originating in the Richmond District, and curvilinear streets which respond to the larger contours of the "cliff" which gives Sea Cliff its

name. The surrounding buildings range in style from Spanish Revival and Craftsman to the International and Mid-Century Modern (**see Figures 17-20**). Each house is carefully landscaped, and many residences have street-fronting walls for privacy.



Figure 17: 170 Sea Cliff Avenue, east of the property, constructed 1914.



Figure 18: 2 27th Avenue, directly south of the property across the street, constructed 1921.



Figure 19: 201 Sea Cliff Avenue, southwest of the property across the street, constructed 1952.



Figure 20: 190 Sea Cliff Avenue, west of the property, constructed 1913.

IV. HISTORIC CONTEXT

EARLY SAN FRANCISCO HISTORY

European settlement of what is now San Francisco took place in 1776 with the simultaneous establishment of the Presidio of San Francisco by representatives of the Spanish Viceroy, and the founding of Mission San Francisco de Asis (Mission Dolores) by the Franciscan missionaries. The Spanish colonial era persisted until 1821, when Mexico earned its independence from Spain, taking with it the former Spanish colony of Alta California. During the Mexican period, the region's economy was based primarily on cattle ranching, and a small trading village known as Yerba Buena grew up around a plaza (today known as Portsmouth Square) located above a cove in San Francisco Bay. In 1839, a few streets were laid out around the plaza, and settlement expanded up the slopes of Nob Hill.

During the Mexican-American war in 1846, San Francisco was occupied by U.S. military forces, and the following year the village was renamed San Francisco, taking advantage of that name's association with the bay. Around the same time, a surveyor named Jasper O'Farrell extended the original street grid, while also laying out Market Street from what is now the Ferry Building to Twin Peaks. Blocks north of this then imaginary line were laid out in small 50-vara square blocks whereas blocks south of Market were laid out in larger 100-vara blocks.²

The discovery of gold at Sutter's Mill in 1848 brought explosive growth to San Francisco, with thousands of would-be gold-seekers making their way to the isolated outpost on the edge of the North American continent. Between 1846 and 1852, the population of San Francisco mushroomed from less than one thousand people to almost 35,000. The lack of level land for development around Portsmouth Square soon pushed development south to Market Street, eastward onto filled tidal lands, and westward toward Nob Hill. At this time, most buildings in San Francisco were concentrated downtown, and the outlying portions of the peninsula remained unsettled throughout much of the late nineteenth century.

With the decline of gold production during the mid-1850s, San Francisco's economy diversified to include agriculture, manufacturing, shipping, construction, and banking.³ Prospering from these industries, a new elite class of merchants, bankers, and industrialists arose to shape the development of the city as the foremost financial, industrial and shipping center of the West.

SEA CLIFF NEIGHBORHOOD HISTORY

The Sea Cliff neighborhood was originally part of the Baker Tract, a large land tract owned by Col. Edward Dickinson Baker and Mrs. Maria Baker Batchelder in the 1870s. The tract was mortgaged to John Brickell in 1874, and although Brickell made efforts to extend city streets to the area, the area remained almost completely undeveloped until the turn of the twentieth century. Meanwhile, beginning in the 1850s the area around the sandy beach now known as China Beach was used as a campsite by Chinese fishermen. Chinese workers made up fifty percent of all fishing crews in the Bay area through the 1880s, after which time government policies, including the Chinese Exclusion Act of 1882, severely reduced the Chinese population and conscribed their ability to work in the fishing industry. By 1890 Chinese people represented just twenty percent of the fishing community,

²Vara is derived from an antiquated Spanish unit of measurement.

³Rand Richards, Historic San Francisco. A Concise History and Guide (2001): 77.

^{4 &}quot;Richmond Streets", The San Francisco Call, March 19, 1892.

⁵ James W. Loewen, "China Beach Leaves out the Bad Parts", originally published in *Lies Across America* (New York: Simon and Schuster, 1999), republished by the Western Neighborhoods Project, accessed at http://outsidelands.org/loewen.php on May 11, 2015.

and their numbers continued to dwindle the rest of the century. By the turn of the twentieth century, the area surrounding China Beach was no longer the site of a Chinese settlement.

After the 1906 Earthquake and Fire, San Francisco's downtown faced the need for immediate reconstruction, and thousands of familes displaced by the disaster looked to the outside lands—espeically the Richmond and Sunset districts—as an opportunity for new housing. Hefty insurance settlements, an influx of Eastern capital and architects, and an improved transportation network spurred rapid residential construction and encouraged the wholesale development of new residential neighborhoods like Sea Cliff.

Capitalizing on this post-quake development opportunity, the John Brickell Company teamed with real estate agent Harry B. Allen and engineer William B. Hoag to survey and develop Sea Cliff into an exclusive "residence park." In 1913, Brickell's holdings in Sea Cliff consisted of steep, crumbling cliffs, and a blank slate for development sandwiched between the Presidio and the city cemetery (now Lincoln Park).⁶ It was also conveniently located along El Camino Del Mar, the scenic boulevard constructed by the Panama-Pacific International Exposition.⁷

Sea Cliff was developed between 1913 and 1928 as four subdivisions, all intended for single-family homes. Sea Cliff Subdivision #1 was surveyed and recorded in 1913 by Hoag, and included 76 parcels north of El Camino Del Mar between 25th Avenue and 27th Avenue (**Figure 21**). The use of terraced, curvilinear streets and extensive landscaping reflected the ideals of the "City Beautiful" movement, and had the benefit of creating building sites which could maximize views of the Golden Gate (**Figure 22, 23**).

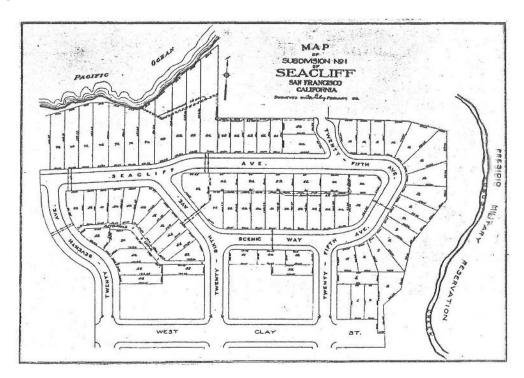


Figure 21: Map of Sea Cliff Subdivision #1 Source: *Homes & Grounds*, October 1916.

⁶ "Bakers Beach District is Highly Improved", The San Francisco Call, April 12, 1913.

⁷ Argonaut. Vol. 15:2 (Winter 2004).

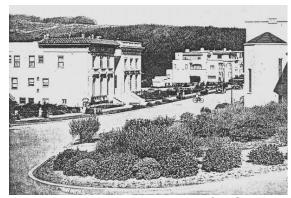


Figure 22: Early Residences in Sea Cliff Subdivision. Source: *Homes & Grounds*, October 1916



Figure 23: Early view of Sea Cliff Avenue, showing street layout and original landscaping. Source: Ungaretti, 106.

The growth of Sea Cliff continued with Subdivision #2 (1916), bounded by California Street, 29th Avenue, McLaren Avenue, Lake Street, and 28th Avenue (**Figure 24**). Subdivision #3 (1923) extended the boundaries of the development to Sea Cliff Avenue on the west and north, 27th Avenue on the east, and El Camino Del Mar on the south. Records indicate realtor Harry B. Allen's involvement, and his company appears with the Brickell Company in an ownership capacity for Subdivision #4 (1928).8 The main streetcar entrance was located at 28th Avenue and California Street, while the main automobile entrance and real estate sales office were at 28th Avenue and Lake Street (**Figure 25**).9

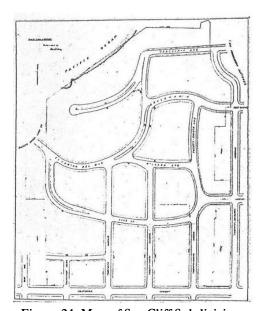


Figure 24: Map of Sea Cliff Subdivisions #2 and #3. Source: *Homes & Grounds*, October 1916.

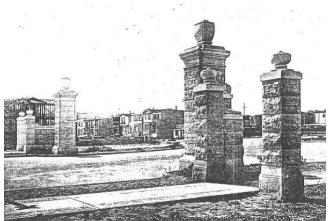


Figure 25: Sea Cliff entry gates, Twenty-Eighth Avenue at Lake Street, with real estate office visible in background.

Source: Homes & Grounds, October 1916.

The new Sea Cliff neighborhood was marketed by Brickell and Allen as an exclusive residential district. Early advertisements and publications touted Sea Cliff's proximity to street car service, restricted residential use, views of the Golden Gate and Marin Headlands, and the individuality of the

⁸ Argonaut. Vol. 15:2 (Winter 2004). San Francisco Assessor/Recorder's Office.

⁹ Homes & Grounds (October 1916)

home designs. The S.A. Born Company partnered with the Brickell Company as the contractor for many of the earliest homes (**Figure 26, 27**). The remaining residences were designed by prominent Bay Area architects, including Willis Polk, Bliss & Faville, Albert Farr, Will H. Toepke, Warren Charles Perry, Charles Whittlesey, Edward G. Bolles, George W. Kelham, Hyman & Appleton, Earl Bertz, Frederic Nickerson, Bakewell & Weihe, Sylvain Schnaittacher, Matthew V. Politeo, Houghton Sawyer, among others, in a variety of popular early twentieth century architectural styles. ¹⁰

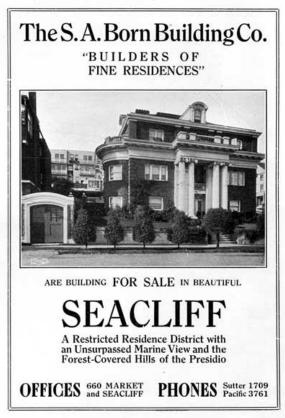


Figure 26: Early advertisement for Sea Cliff, 1914 Source: Western Neighborhoods Project, http://www.outsidelands.org

Interesting Notes About "Sea Cliff"

No Oriental or Ethiopian can own property in "Sea Cliff."

All buildings must set back from front property line sufficiently to carry out the general plan of parking.

The restrictions in "Sea Cliff" protect your home, family and investment.

"Sea Cliff" prices are not prohibitively high.

The man of moderate means can build or the owners will build for him on terms.

The man or woman seeking a home or homesite should see "Sea Cliff" before deciding on a location.

The owners of "Sea Cliff" have an exceptionally liberal offer for homeseekers.

Figure 27: Advertisement about neighborhood policies, 1916
Source: Homes & Grounds, October 1916.

By 1930, the development of Sea Cliff began to slow as the supply of unoccupied lots dwindled and as the onset of the Great Depression began to impact the economic stability of the country. Still, some homes were constructed during this period, often composed in Mediterranean and other revival styles that refelected the established architectural vocabulary of the neighborhood. However, more contemporary and modern stylistic treatments began to appear as the decade progressed. Some residences of the late 1930s began to exhibit low profile rooflines, simple wall planes with little ornament, and ribbon windows, all hallmarks of the International style. By the early 1940s, Art Moderne inspired elements, as exhibited at the residence at 12 25th Avenue, became part of the architectural fabric of Sea Cliff. Frank Lloyd Wright, the grandfather of American Modernism, was

¹⁰ Argonaut. Vol. 15:2 (Winter 2004), Homes & Grounds (October 1916).

commissioned to design a residence at 830 El Camindo Del Mar in 1945; however, this project never came to fruition.¹¹

In the post-war period, the majority of the remaining unoccupied lots in Sea Cliff were sold and developed. The new residences all exhibited Modern aesthetics typical of the period, marking a notable departure from the historicist revival styles that had defined the neighborhood prior. 12 Many of these Modern residences were designed by celebrated Modernist architects. William Wurster, one of San Francisco's most prolific modern architects who is often credited with defining the Second Bay Tradition style, was responsible for a number of Sea Cliff residences constructed during the 1950s. Some of his more notable designs include the Second Bay Tradition residences at 35 27th Street (1951) and 850 El Camino Del Mar (1958; altered), as well as the Wurster, Bernardi & Emmons' designed Mid-Century Modern home at 830 El Camino Del Mar (1965) (Figure 28). 13 Joseph Esherick, another modern master architect, also designed a number of residences throughout the neighborhood in the late 1950s and 1960s. Examples of Esherick's work include the Mid-Century Modern residence at 420 El Camino Del Mar (1958) and the Third Bay Tradition style, shingle-clad 100 32nd Ave (1963).14 One of the most celebrated designs associated with Esherick is the Wrightian, Japanese-influenced residence at 890 El Camino Del Mar (1963), which was designed by the firm of Esherick, Homsey, Dodge & Davis (Figure 29). 15 Other examples of Modern design at Sea Cliff inlcude the Mid-Century Modern design at 55 37th Ave (1948), Modern Ranch style at 535 El Camino Del Mar (1951), the Japanese-inspired Second Bay Tradition style at 50 McLaren Avenue (1958), and the Mid-Century Modern at 800 El Camino Del Mar (1959, undergoing alterations) (Figure 30). 16

¹¹ Paul Keskeys, "Forgotten Icon: this Cliffside Residence Could Have Been Frank Lloyd Wright's Finest Masterpiece," in *Architzer*, October 21, 2016, accessed July 27, 2017, https://architizer.com/blog/fallingwater-2-morris-house.

¹² San Francisco Planning Department, "Historic Resources Evaluation Response – 535 El Camino Del Mar," Case No. 2012.0266E, prepared by Gretchen Hilyard (August 2012).

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ This information is largely derived from observations using the Google Street View at http://maps.google.com and the information provided by the San Francisco Property Information Map database at http://propertymap.sfplanning.org/. Both were accessed July 2017.



Figure 28: 35 27th Street, designed by Mid-Century master architect William Wurster, 1951. Source: San Francisco Public Library Historical Photograph Collection, AAM-2134.



Figure 29: 890 El Camino Avenue, designed by Esherick, Homsey, Dodge & Davis in 1963, pictured in 2011. Source: Flickr.com (2011).

Although the neighborhood had largely been built out in the decades prior, some new buildings were constructed in Sea Cliff through the 1970s and 1980s (**Figure 31**)). These new buildings continued to express the contemporary architectural trends of the day; Post-Modern, Abstract, and Structuralist designs were peppered throughout the neighborhood, increasing the variety of architectural styles in Sea Cliff. In addition, some of the pre-existing properties were remodeled to reflect the shifting

architectural preferences, both in historicist and modern-inspired traditions. This trend of remodels and alterations has continued through to the present day.¹⁷



Figure 30: 50 McLaren Avenue, constructed in 1958. Source: Google Maps Street view, 2017.



Figure 31: 475 Sea Cliff Avenue, constructed in 1971. Source: Google Maps Street view, 2017.

Sea Cliff remains one of the most affluent neighborhoods in San Francisco. Many of the original homes, designed by some of the most prolific San Francisco architects of the early 20th century, remain, as do examples of some of San Francisco's most notable Modern masters. While the neighborhood is largely defined and known for its original housing stock, new construction and remodels over the decades since the 1930s have established an architecturally varied neighborhood that exhibits some of the best examples of twentieth century architectural styles in San Francisco.

¹⁷ "Sea Cliff Architecture," on San Francisco Architects, July 12, 2017, accessed July 25, 2017, https://sanfranciscoarchitects.org/2017/07/12/seacliff-architecture/.

V. PROJECT SITE HISTORY

SITE DEVELOPMENT

178 Sea Cliff Avenue was platted as part of Sea Cliff Subdivision #1, which was recorded in 1913. The first Sanborn Fire Insurance Map to depict the subject block was drawn the same year. While one structure can be seen at the waterfront along Sea Cliff Avenue (190 Sea Cliff Avenue, extant, see **Figure 20**), the majority of the neighborhood was still vacant, occupied by rough sandy seafront terrain that had long been part of the Baker Tract (**Figure 32**).

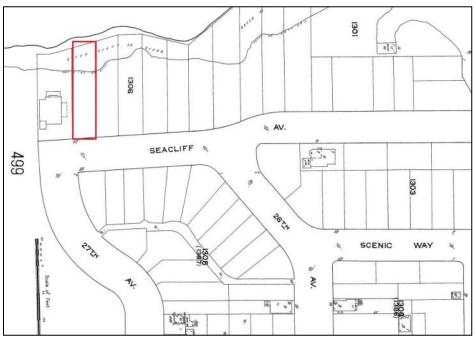


Figure 32: 1913 Sanborn Fire Insurance Map, Sheet 483, showing the platted but largely unbuilt neighborhood and coastline in Subdivision #1. Source: San Francisco Public Library Online Database.

In 1914, a building permit was filed for construction of a new residence at Lot No. 75 in Sea Cliff Subdivision 1. The builder was S. A. Born Building Co., the architect was Edward G. Bolles, and the owner was Eminal P. Halsted. 178 Sea Cliff was constructed with a concrete foundation, wood framing, metal lathe, plaster, and a composite-material roof. The garage at 178 Sea Cliff Avenue was built two years after the house, and was designed by the well-known architect August Nordin.

After the subject block was platted in 1913, houses were rapidly constructed along the north side of Sea Cliff Avenue, while the south side of the street developed more slowly. The houses along the north side of the street were all platted in a line, forming a cohesive boundary between the neighborhood and the sea. 170 Sea Cliff Avenue, directly to the east of the subject property, was also constructed in 1914, for William A. Halsted, the brother of Eminal P. Halsted. By 1938, an aerial photograph depicts the north side of the street as nearly fully developed, while the south side of the street was still largely undeveloped (**Figure 33**). A reason for the late development of the south side of the block has not been uncovered through research, but may just have been a byproduct of the lesser ocean views from these lots.

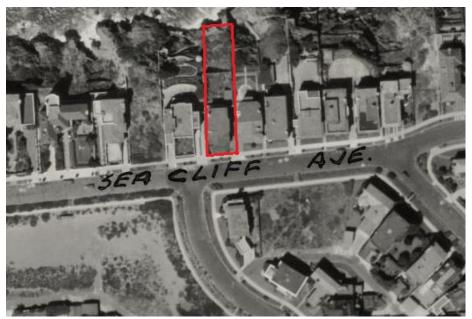


Figure 33: 1938 aerial view. The lots along the north side of Sea Cliff Avenue were fully developed, while the south side of Sea Cliff Avenue remained undeveloped. Source: David Rumsey Historical Map Collection. Harrison Ryker, San Francisco Aerial Views, plate 142 (1938).

As the neighborhood developed, the area around 178 Sea Cliff became almost completely built out by 1950 (**Figure 34**).

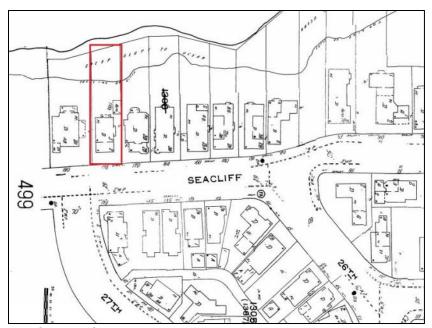


Figure 34: 1950 Sanborn, Sheet 483, showing the neighborhood with very few undeveloped lots. Source: San Francisco Library Online Database.

As the twentieth century came to a close, the neighborhood became completely built out in the immediate vicinity of 178 Sea Cliff Avenue (**Figure 35**). The neighborhood retains its uniformly residential character and its terraced, curvilinear streets and extensive landscaping

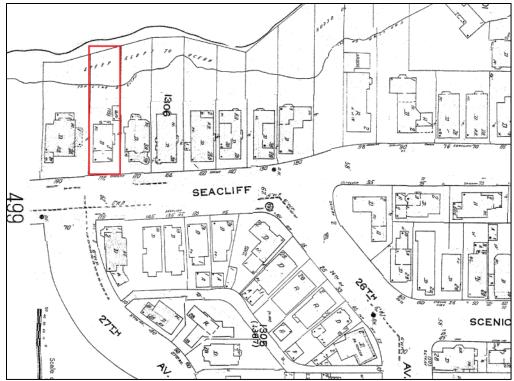


Figure 35: 1998 Sanborn of the surrounding blocks. Source: San Francisco Online Property Information Map.

EDWARD G. BOLLES

Architect Edward Grosvenor Bolles was born in Rosemond, Illinois ¹⁸ on November 12, 1871. ¹⁹ He moved to San Francisco in 1893 and commenced his career as a draftsman and architect in 1899. ²⁰ Bolles worked on projects with other San Francisco architects, including William Mooser and Albert Schroepfer. Bolles was a member of the American Institute of Architects (AIA) and designed a variety of types of buildings ranging from private homes to warehouses, apartments, and civic buildings. ²¹ He worked in partnership with developer S. A. Born on the Sea Cliff, West Clay Terrace and Ashbury Park developments. Bolles designed homes in a broad variety of popular revival and eclectic styles, including Craftsman, Tudor Revival, and the Spanish Renaissance style.

Many of Bolles' residential designs were featured in the real estate section of the *San Francisco Chronicle* in the first decades of the 1900s. In 1915, Bolles designed a new home for Stephen A. Born, president of the S.A. Born Building Company at 1 Ashbury Terrace (**Figure 36**).²² Bolles designed adjacent houses for brothers Eminel P. Halsted and William A. Halsted in 1914 at 178 and 170 Sea Cliff Avenue, respectively (**Figures 37, 38**)²³ out of his office on 660 Market Street.²⁴ He also designed a home at 25th and Sea Cliff Avenue, and various other homes in the Sea Cliff neighborhood (**Figures 39-44**).

¹⁸ 1920 United States Census. Accessed at www.ancestry.com.

¹⁹ San Francisco Area Funeral Home Records. Accessed at www.ancestry.com.

²⁰ Parry, David. "John S(avage) Bolles," Encyclopedia of San Francisco. http://www.sfhistoryencyclopedia.com/articles/b/bollesJohn.html.

²¹ "Arts and Architecture" 1918, v. 15-6, p 308.

²² 1916 Crocker-Langley San Francisco Directory.

²³ San Francisco Chronicle, 6/27/1914, p 8.

²⁴ 1914 San Francisco City Directory, p. 2015.

Bolles married wife Ida in 1895 and in 1900 they lived in Alameda, California.²⁵ They had four children: Lyman Grosvenor, Carol, John, and Elizabeth.²⁶ Bolles' first marriage ended in divorce, and his second wife, Suzanne Verirn, was a lawyer. The couple moved to San Francisco in the 1920s.²⁷



Figure 36: 1 Ashbury Terrace, built as the home of S.A. Born in 1915. Source: Google Earth.

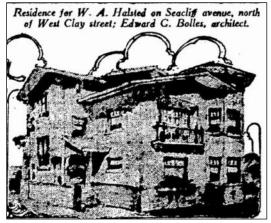


Figure 37: 170 Sea Cliff Avenue, directly east of the subject property, built for W.A. Halsted. Source: San Francisco Chronicle, June 27, 1914, p.8.



Figure 38: 170 Sea Cliff Avenue today. Source: Page & Turnbull, May 2015.

²⁵ 1900 United States Census. Accessed at www.ancestry.com.

²⁶ 1910 United States Census. Accessed at www. Ancestry.com.

²⁷ 1920 United States Census. Accessed at www.ancestry.com.

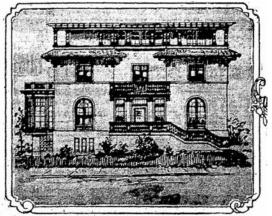


Figure 39: Residence at "Twenty-fifth and Cliff avenues" in the Sea Cliff development, unknown present condition. Source: San Francisco Chronical, November 29, 1913, page 10.

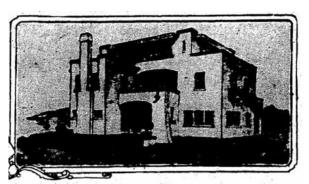


Figure 40: Labeled as a "residence for S.A. Born, east side of Twenty-fifth avenue" in the Sea Cliff development, 1914. Source: San Francisco Chronicle, April 11, 1914, p 4.



Figure 41: 1914 Residence at 2 Sea Cliff Avenue, for Mr. George O. Hoadley. Source: Architect & Engineer, vol 37 (1914) p.22.



Figure 42: Residence at 8 Sea Cliff Avenue (formerly 2 Sea Cliff Avenue). Source: Google Maps.



Figure 43: 1915 Residence of Mrs. Fatjo at 2829 Pacific Avenue. Source: Architect & Engineer, vol 41 (1915) p. 67.



Figure 44: 2829 Pacific Avenue. Source: Bing Maps.

In the later part of his career, Bolles shifted to larger projects, including the apartment building at 2360 Pacific Avenue, built in 1929. Bolles collaborated with Albert Schroepfer on the project, and the Art Deco building still exists today (**Figure 45**).



Figure 45: 2360 Pacific Avenue, completed in 1929, designed by Bolles and Schroepfer. Source: www.2360PacificAvenue.com

Edward's son John Savage Bolles became a prominent architect whose works included Candlestick Park and the Chinatown housing development Ping Yuen.²⁸ Edward and his son John Bolles collaborated on the design of the Temple of Religion and the Christian Science Monitor buildings for the Golden Gate International Exposition (**Figures 46, 47**).²⁹ Both buildings have been demolished. Edward G. Bolles died August 7, 1939 in San Francisco.³⁰

²⁸ "Three Apartment Buildings, 234 Units: Chinatown Housing Project Contract Let," San Francisco Chronicle. July 29, 1950,

²⁹ Sharer, Robert J. "e-Stury Guide for Ancient Maya," 2014. http://books.google.com/books?isbn=1467297135 (accessed on June 17, 2015).

³⁰ San Francisco Area Funeral Home Records. Accessed at www.ancestry.com.



Figure 46: Christian Science Monitor Building, designed by Edward and John Bolles. Source: Treasure Island Museum GGIE postcard digital archive.

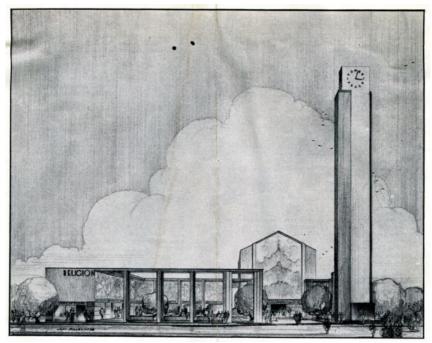


Figure 47: The Temple of Religion building, designed by Edward and John Bolles. Source: Graduate Theological Union Special Collections, digital archives.

AUGUST NORDIN

August Nordin was born in Stockholm, Sweden in 1869. He opened his architectural firm in San Francisco in 1899. The firm was located in the Mills Building until Nordin's death in 1936. He is attributed with designing 300 structures in San Francisco, mostly residential homes, flats, and apartment houses, but also residential hotels and commercial and civic buildings. Nordin designed the Swedish American Hall (1907) at 2168 Market Street, as well as the Ebenezer Swedish Lutheran Church at the corner of Dolores and 15th streets (1903, destroyed by fire 1993). Nordin designed the simple garage at 178 Sea Cliff Avenue, built in 1916.

CONSTRUCTION CHRONOLOGY

The following provides a timeline of construction activity at 178 Sea Cliff Avenue, based on building permits on file with the San Francisco Department of Building Inspection. Copies of all available permits are included in **Appendix A.**

| Date | Permit Number | Owner | Scope of Alterations |
|-----------|------------------|----------------|---|
| 9/1/1914 | 56254 | E.P. Halsted | Construct a 3 story frame residence. Concrete |
| | | | foundation, metal lathe, plaster, composite roof. |
| | | | Architect: Edward G. Bolles. |
| 3/28/1916 | 68749 | E.P. Halsted | Construct a garage. Architect: August Nordin. |
| 7/23/1946 | 83942 | Mrs. Doyle | Repair of rotten woodwork & replace plaster. |
| 6/25/1970 | 345672 | Louisa F(usco) | Kitchen demo, no structural changes. |
| 4/24/1973 | 376320 | Mildred Fusco | Shoring system for the failing retaining wall. |
| 2/15/1990 | 638025 | Mildred Fusco | Construct a new 6' high beam wall at the top of slope, which is eroding. |
| 5/4/2010 | 1210989 | Fusco Trust | Repair dryrot behind stucco at sliding glass door and rear left corner. Replace sliding door in kind. |

The original wood-sash windows at the first story of the south façade appear to have been replaced, based on an illustration of the residence completed in 1972 that shows one-over-one windows with ogee lugs in these locations (similar to those currently at the second story). The replacement of these windows is not reflected in available permits for the property. The rear (north) second story windows and sliding doors are aluminum and appear to date after the house was constructed. Based on the replacement of the rear second story windows, and a 1938 aerial image of the property, it appears that the rear balcony is an addition. The permit history does not specifically identify the balcony as an addition, but due to the modest design and construction methods of the balcony, with simple metal poles for support and no decoration or significant incorporation into the general house style, it is likely not original to the residence. Additionally, the first story windows that flank the fireplace in the north-side living room have been covered over, and the west façade has two aluminum-sash windows and a vinyl sliding door, changes which are not reflected in the permit history.

OWNERSHIP AND OCCUPANT HISTORY

The following table provides the known ownership history of 178 Sea Cliff Avenue according to records held by the San Francisco Assessors Office.

| Grantor (From) | Grantee (To) | Date | | |
|-----------------------|---|-------------------------|--|--|
| | E.P. Halsted | 1914, house constructed | | |
| Clara S. Halsted | W.A. Halsted | 5/11/1918 | | |
| Estate of E. Halsted | Clara H. Doyle (family Halsted) | 5/3/1941 | | |
| Unknown | John M. Gordon & Brenda D.F. Gordon | 5/5/1960 | | |
| Estate of Clara Doyle | Eminel P. Halsted Jr. (deed) | 5/5/1970 | | |
| Eminel P. Halsted Jr. | Mildred Fusco (trust) | 7/20/1970 | | |
| Mildred Fusco Trust | Elvera Fusco (33%) Lorenzo Fusco (33%), Mildred Fusco (33%) | 1/21/1971 | | |

| Grantor (From) | Grantee (To) | Date |
|----------------------|-----------------------|-----------|
| Elvera Fusco (33%) | Mildred Fusco (33%) | 4/29/1996 |
| Mildred Fusco (33%), | | |
| Lorenzo Fusco (33%), | | |
| Elvera Fusco (33%) | Elvera L. Fusco Trust | 7/7/2008 |

The first owner of 178 Sea Cliff Avenue was Eminel P. Halsted, who was born in California in 1873 to James L. Halsted and Mary E. Halsted.³¹ James L. Halsted established a funeral home known as Halsted & Company in 1883, which was located at 946 Mission Street.³² Eminel P. Halsted was trained as a dentist in the early 1900s, but joined the family undertaking business in 1910 (**Figure 48**).³³ Eminel P. Halsted married Clara S. Brown c. 1901 and they had a son Eminel P. Halsted Jr. in 1908.³⁴

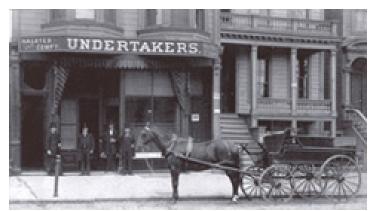


Figure 48: Halsted & Company Undertakers, 946 Mission Street, date unknown. Source: Halsted N. Gray-Carew & English Funeral Directors.

By 1920, Clara Halsted was widowed, and remarried to William A. Doyle by 1930.³⁵ Doyle was born in 1877 and already had three children who were close in age with Eminel P.Halsted Jr. William Doyle was an account office manager for Henry Doyle & Co. which dealt in Irish thread, netting and twines.³⁶ The couple lived at 178 Sea Cliff Avenue in 1930 according to the US Census, and remained at the address until 1970.³⁷

It is unclear precisely how Brenda M. Doyle was related to William A. Doyle, Clara Halsted's second husband, but Brenda and her husband John M. Gordon briefly owned the property in the 1960s. Brenda M Doyle was born in 1925 to Richard Eugene Doyle and Agnes Feeny Doyle.³⁸ She married John M. Gordon in July of 1959.³⁹ The couple never lived at 178 Sea Cliff Avenue.

Mildred Fusco was born in California in 1925 to Salvatore Fusco and Louisa Sinischalchi Fusco. Mildred grew up the daughter of a fish merchant with siblings Lorenzo (1923- 2009) and Elvira who was born in 1927. 40 Mildred traveled abroad numerous times, sometimes with her mother and sister,

^{31 1880} United States Census. Accessed at ancestry.com.

³² San Francisco Public Library, 1899 Sanborn, vol 2, sheet 138.

³³ City Directory 1909-1910.

³⁴ 1910 US Census, ancestry.com.

³⁵ 1930 US Census, ancestry.com.

³⁶ 1900 San Francisco City directory, 561.

³⁷ San Francisco City Directories, 1968-75.

^{38 1940} US Census, Ancestry.com

³⁹ California Marriage Index, 1949-1959, Ancestry.com.

^{40 1940} US Census, ancestry.com.

and she never married.⁴¹ Mildred shared the home, in residence and in partial ownership, with her siblings through the following two decades. Mildred died in 1996 and the property was held in trust between the remaining siblings, but did eventually pass to her younger sister Elvira.

⁴¹ New York Passenger Lists, 1820-1957. Ancestry.com

VI. EVALUATION

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.

In order for a property to be eligible for listing in the California Register, it must be found significant under one or more of the following criteria.

- Criterion 1 (Events): Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- *Criterion 2 (Persons)*: Resources that are associated with the lives of persons important to local, California, or national history.
- *Criterion 3 (Architecture)*: Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.
- Criterion 4 (Information Potential): Resources or sites that have yielded or have the
 potential to yield information important to the prehistory or history of the local
 area, California, or the nation.

The following section examines the eligibility of 178 Sea Cliff Avenue for individual listing in the California Register:

Criterion I (Events)

178 Sea Cliff Avenue is not significant under Criterion 1 (Events) as a property that is individually associated with events that have made a significant contribution to the broad patterns of local, state or National history. The building is located in Sea Cliff Subdivision # 1 and was constructed in 1914, one year after the subdivision was platted. The building was designed by Edward G. Bolles, an active residential architect who built several other houses in Sea Cliff, and the sale was facilitated by S. A. Born Building Co., the primary developer of Sea Cliff. However, 178 Sea Cliff Avenue was part of a wave of construction that took place in this neighborhood when it was first platted and developed, and as such, is a representative rather than discreetly important example of this pattern of events. The building cannot independently convey the significance of this pattern of events, and would not be considered individually significant under Criterion 1 (Events.) The eligibility of 178 Sea Cliff Avenue as a contributing property to an identified California Register-eligible historic district is addressed below.

Criterion 2 (Persons)

178 Sea Cliff Avenue is not individually significant under Criterion 2 (Persons) for an association with the lives of persons important to local, state, or national history. The house was constructed for Eminel P. Halsted and his wife Clara. Halsted worked at his family's funeral service company, which was established in San Francisco by his father, James L. Halsted in 1883. The Halsted family operated their funeral service company independently until 1980, when they merged with N. Gray Mortuary,

which in turn merged with Carew & English to become known as Halsted N. Gray-Carew & English Funeral Directors, still in operation on Sutter Street. Despite this long history of operation, the Halsted family funeral business does not appear to have been historically significant, either in the City's history or in the development of the funeral service industry. 178 Sea Cliff Avenue, as the private residence of one of the sons of the founder of the company, is not historically significant such that it would be eligible for the California register. Therefore, the building is not significant under Criterion 2 (Persons.)

Criterion 3 (Architecture)

178 Sea Cliff Avenue is not individually significant under Criterion 3 (Architecture) as a property that embodies the distinctive characteristics of a type, period, region, or method of construction. Constructed in 1914, during a period of eclecticism that followed the wane of the Victorian era, the building includes elements of Arts and Crafts, Prairie, and Craftsman design, but can not be said to embody any one of these styles to a degree that it would be an architecturally significant example of these styles. While the building was designed by Edward G. Bolles, who was an active residential designer during this era, the house appears to be one of his more modest designs. Other extant examples of Bolles' residential work from this era, including 8 Sea Cliff Avenue (1914), 2829 Pacific Avenue (1915), 1 Ashbury Terrace (1915) and even 170 Sea Cliff Avenue (1914), directly east of the subject property, include more complex forms and architectural detail than 178 Sea Cliff Avenue, which presents a simple, almost box-like façade to the street. While the building includes some areas of artistic detail, mainly concentrated at the primary entrance and the massing above the primary entrance, it cannot be said, overall, to represent the work of a master architect, nor to possess high artistic values to a degree that it would be eligible for inclusion in the California Register under Criterion 3 (Architecture.)

Criterion 4 (Information Potential)

Evaluation of 178 Sea Cliff Avenue under Criterion 4 (information Potential) is beyond the scope of this report. This criterion is generally applied to sites which may provide archeological resources.

POTENTIAL SEA CLIFF HISTORIC DISTRICT

The Sea Cliff Historic District has been identified and found potentially eligible to the California Register through the CEQA review process. Between 2007 and the present, numerous HRE Part 1 reports have been completed for individual properties located within the Sea Cliff neighborhood, as required by the City of San Francisco Planning Department to comply with CEQA procedural requirements. City staff members review all HREs and provide comments for each via a Historic Resource Evaluation Response (HRER). The resulting body of HRERs authored by Planning Department staff has recognized that a Sea Cliff Historic District appears to exist and qualify as a historic district eligible for California Register listing. No formal survey of the historic district has yet taken place, and therefore definitive district boundaries and a comprehensive list of contributors and non-contributors does not exist. The contributing status of individual properties within the apparent boundaries of the district continues to be evaluated as HREs are completed on an ad-hoc basis, as the need for evaluation arises per the CEQA process.

The Sea Cliff neighborhood exemplifies early twentieth century "residence park" design, a neighborhood planning concept that reflected the ideals of the City Beautiful movement. Inspired by the garden communities found in East Coast cities, a number of these "residence parks" were constructed west of Twin Peaks in an effort to prevent a further exodus of wealthy families from San Francisco to Peninsula and East Bay cities.

Sea Cliff was established as an exclusive residential neighborhood that was platted in four stages from 1913 to 1928, and largely built out by 1935. The design features terraced, curvilinear streets and

extensive landscaping. Homes are principally designed in one of the popular Eclectic Revival styles. Most were constructed by the S.A. Born Company, or custom-designed for individual owners by prominent Bay Area architects. HRERs completed by the San Francisco Planning Department specify that the historic district is considered to be significant for the California Register under Criterion 3 (Architecture), as a noted example of early 20th-century residential neighborhood planning in San Francisco.

178 Sea Cliff Avenue was constructed in 1914, one year after Sea Cliff's first subdivision was platted. It was designed by architect Edward G. Bolles, who was one of several well-known architects who was active in the Sea Cliff subdivisions. The sale of the house was facilitated by S. A. Born Building Co., the primary developer of Sea Cliff. As the property dates to the earliest phase of the subdivision's development, contributes to the overall architectural character of the surrounding neighborhood, and retains overall integrity (see below for an analysis of the building's integrity), it appears that 178 Sea Cliff Avenue is a contributor to the potential Sea Cliff Historic District.

INTEGRITY

In addition to qualifying for listing under at least one of the National Register/California Register criteria, a property must be shown to have sufficient historic integrity. The concept of integrity is essential to identifying the important physical characteristics of historical resources and hence, in evaluating adverse changes to them. Integrity is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The process of determining integrity is similar for both the California Register and the National Register. The same seven variables or aspects that define integrity—location, design, setting, materials, workmanship, feeling and association—are used to evaluate a resource's eligibility for listing in the California Register and the National Register. According to the National Register Bulletin: How to Apply the National Register Criteria for Evaluation, these seven characteristics are defined as follows:

- *Location* is the place where the historic property was constructed.
- *Design* is the combination of elements that create the form, plans, space, structure and style of the property.
- *Setting* addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building(s).
- Materials refer to the physical elements that were combined or deposited during a
 particular period of time and in a particular pattern of configuration to form the
 historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history.
- Feeling is the property's expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.

178 Sea Cliff Avenue remains in the location where it was constructed and therefore retains integrity of location.

⁴² California Office of Historic Preservation, *Technical Assistant Series No. 7, How to Nominate a Resource to the California Register of Historic Resources* (Sacramento, CA: California Office of State Publishing, 4 September 2001) 11

A review of available building permits and an inspection of current conditions indicate that the residence has experienced few changes to its design since it was constructed. While select windows have been replaced and a rear balcony has been added, these changes do not substantially detract from the building's original massing, fenestration pattern, and decorative features. The building therefore retains integrity of design.

The wider setting of the Sea Cliff subdivision retains much of its character as a "residence park" dating to its first phases of development. The subject property is located among a collection of residences that were constructed during the same era; other nearby residences that were built during subsequent decades largely conform to the original scale of development and do not overwhelm the neighborhood's historic properties. The subject building therefore retains integrity of setting.

Identified changes to the residence at 178 Sea Cliff Avenue since its construction (such as the removal of wood-sash windows at the first story) do not appear to have substantially changed the property's overall material palette or characteristic construction techniques. Therefore, it retains integrity of materials and workmanship.

The continued use of the subject property as a single-family residence since its construction has maintained its historic function, in keeping with the overall use of the surrounding neighborhood. For this reason, in addition to its intact setting, the property retains integrity of feeling.

Due to the fact that it retains integrity of location, design, setting, materials, workmanship, and feeling, the residence at 178 Sea Cliff Avenue is identifiable as a single-family residence constructed during the early development of the Sea Cliff subdivisions. It therefore retains integrity of association and contributes to the historic character of the identified, potential Sea Cliff Historic District.

VII. CONCLUSION

178 Sea Cliff Avenue was constructed in 1914 in the newly-platted Sea Cliff Subdivision #1. It was designed by prominent architect Edward G. Bolles, and the sale of the house was facilitated by the S. A. Born Building Company, the primary developer of Sea Cliff. The first owner, Eminal P. Halsted, was the operator of his family funeral business, placing him in the upper-middle class, a group to whom the Sea Cliff subdivision was specifically marketed. 178 Sea Cliff Avenue is not individually historically significant for its architecture, which is a simplified hybrid of several styles and one of the less distinctive residential works of Edward G. Bolles. Nor is it individually historically significant for any association with an event, pattern of events, or persons. However, in a preliminary consideration of the Sea Cliff Historic District—identified by the San Francisco Planning Department as a potential historic district for the purposes of CEQA review—it appears that 178 Sea Cliff Avenue would be considered a district contributor. Proposed alterations to the property would therefore need to be reviewed for their impact on historic resources under CEQA.

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520 El Camino del Mar/Case No. 2013.0423E

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255 Sea Cliff Avenue/Case No. 2014.1310E

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IX. APPENDIX A: AVAILABLE BUILDING PERMITS

INSPERINGIPULLE Works Bureas of Bldg. Inspection F. No. 2 BUILDIN

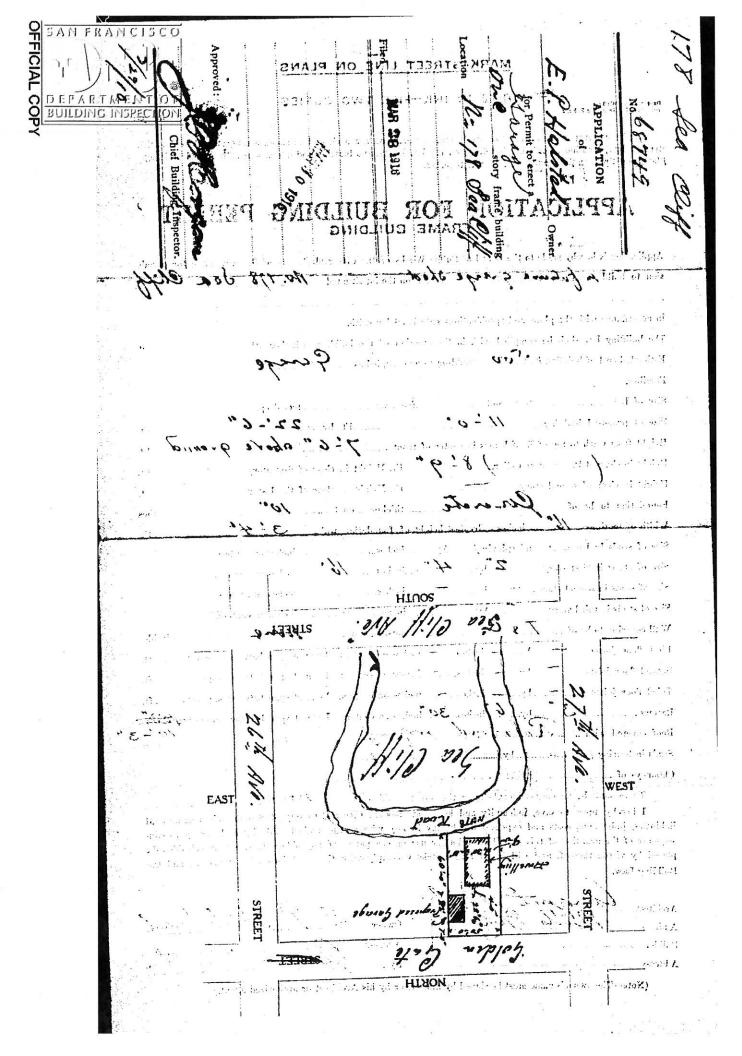
WRITE IN INK FILE TWO COPIES

Applicant must indicate in ink correstly and distinctly on the back of this sheet, a diagram of the let with street, alloys, location of existing buildings on the lot, if any, and location and demensions of proposed buildings Plans and Specifications must be fastened together.

APPLICATION FOR BUILDING PERMIT

| FRAME BUILDING |
|--|
| Application is hereby made to the Board of Public Works of the City and County of San Francisco for permission to build a France Rendered on the lot situated in Subdivision Hal |
| of Searliff Lot No 75 |
| in accordance with the plans and specifications submitted herewith. |
| The building law shall be complied with in the erection of the building, whether otherwise specified or not. |
| Estimated cost of building \$9500. Building to be occupied as Residence. By No. 1882 |
| Families. |
| Size of Lot 42.56 feet front 4441 feet rear 167.06 feet deep. |
| Size of proposed Building 28 Ft. by 50 |
| Height from Curb to top of Roof beams in center of fr at |
| Height in clear of Basement or Cellar |
| Height in clear of second story 8/2 Ft. Height in clear of third story 7/2 Ft. |
| Foundation to be of Concrete thickness, on top 12" inches |
| Width of footings |
| Size of studs in basement (underpinning) 3 by by inches /16 inches on centers. |
| Size of studs in first story |
| Size of studs in second story 3. by |
| Size of studs in third story Z by inches 16 inches on centers. |
| Wall covering to be of Motal Lell 1 Plaster durside, and wood Lath and Plaster inside. |
| First floor joists |
| Second floor joists. 2 by 10 inches 16 inches on centers. Longest span between supports 17 ft. |
| floor joists 2 by 10 inches 16 inches on centers. Longest span between supports 16 ft. |
| Rafters 2 hy 8 inches 16 inches on centers. Longest span bet een supports 16 ft. |
| Roof covered with Composition |
| Studs in bearing partitions. 3. by. 4. inches. 16. |
| Chimneys of Patent Flues |
| There shall be no encreachments upon the street or sidewalk. 26. |
| I hereby agree to save, indemnify and keep harmless the City and County of San Francisco against all liabilities, judgments, costs and expenses which may in anywise accrue against said city and county in consequence of the granting of this permit, or from the use or occupancy of any sidewalk, street or sub-sidewalk placed by virtue thereof, and will in all things strictly comply with the conditions of this permit, and the Puilding Law. |
| Architect Edw G. Buller Address G. Born Blds Co Address Gla Marlet S. Address Gla Marle |
| Address 660 quarters By Goden J. Bollen |

(Note.-The owner's name must be signed by himself or by his Architect or authorized Agent.)



RTMENTOF MG INSPECTION

WRITE IN INK-FILE TWO COPIES

Applicant must indicate in ink correctly and distinctly on the back of this sheet, a diagram of the lot with Applicant must indicate in ink correctly and distinctly on the back of this sheet, a diagram of the lot with street, alleys, location of existing buildings on the lot, if any, and location and dimensions of proposed buildings. Plans and Specifications must be fastened together.

APPLICATION FOR BUILDING PERMIT

| to build for Games Games Games Jacob | on the lot situate | ed //w./ | 78 Joa 6 | wiff- |
|--|--------------------|--|--|-----------------------------|
| ecordance with the plans and specifications submi | itted herewith. | # 8 # F | | I av not |
| | ation of the hu | ilding, whether | otnerwise specified | a or not. |
| building law shall be complied with in the erection imated cost of building \$ 500 Building to be | be occupied as | yere | . By No | |
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| e of Lotfeet front | .feet rear | feet de | eep. | |
| of Lot | TV | t. by 22 | -69 | Ft. |
| e of Lot feet front e of proposed building fight from Curb to top of Roof beams in center of | | :6 "/ OL | Lete Quent | d) Ft. |
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| hv | inchea | не | ence on centers. | |
| ize of studs in third story | inches | inc | ches on centers. | |
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| lecond floor joists by inches | inches on cer | aters. Longest | span between supp | السسسية، المارية * و مصر |
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| I hereby agree to save, indemnify and ke | deb naruness vic | o ecemia again | st said city and co | ounty in con- |
| lightlities, judgments, costs and expenses water | may m way | of any (| sidewalk street or | anh-sidewalk |
| liabilities, judgments, costs and expenses which sequence of the granting of this permit, or from placed by virtue thereof, and will in all things | strictly comple | with the eon | ditions of this per | mit, and the |
| placed by virtue thereof, and will in an things | io | | | |
| Building Law. | , | | _ | |
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| Architect Architect | Owner | E | 1. of he | oreas |
| Address Mills Mag | - l | | | 2 |
| Builder | Addre | 1/11 | in will | war |
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| SAN FRAN PROPERTIES BUILDING INS | BLDG. FORM. | No. 90 P | FOR PERMIT TO MAKE | TO BUILDING | Cocation | Coat 8 400 000 | 19 19 19 19 W WILL !! 1946 | APPROVED | A THE WAY TO SEE THE SECOND SE | Supertification Supertification Building Inspection | Permit No P 3 943 | JUL 23 1946 | | |
|------------------------------------|---|---|---------------------------------|--|-----------|------------------------------------|---|--------------------------------|--|--|---------------------------|--------------------------------------|--|-----------------------------------|
| | C.7. Limbory | | | | | | | | Workmen's Compensation Insurance Policy or Certificate filed with Central Permit Bureau | No Workmen's Compensation Insur- ance Policy or Certificate on file for | (a) No one to be employed | (b) Casual labor only to be employed | (c) Services or labor to be performed in return for aid or sustenance only, received from any religious, | charitable or relief organization |
| | APPROVED: | Superintendent Bureau of Building Impetion | ZONING: (of forming use onely) | Olty Plynding Commission | APPROVED: | Mellette Director of Public Health | APPROVED: | | Department of Electricity | AFROVEN: | Bureau of Engineering | APPROVED: | Art Complesion | |
| | BUREAU OF FIRE PREVENTION AND INVESTIGATION | Construct and Install on Building to Satisfac- tion of Bureau of Fire Prevention the Follow- ing Fire Protection Equipment and Appliances | | F. D. (Dry) Standpipes Wet Standpipes Hose Reels | Tanks | Downpipes Automatic Fire Pumps | Automatic Sprinkler System Water Service Connection | Georgian Company Retrigeration | | 5. | APPROVED: | FRANK P. KELLY, CHEF | By SXE 3/13/4 | |

| | CISCO SECTION PERMIT BURBAN P. NO. 488 Writes in Ink.—File Two Copies | | | | | | | | | |
|--------------------------|--|--------------|--|--|--|--|--|--|--|--|
| FICIAL | CITY AND COUNTY OF SAN FRANCISCO | | | | | | | | | |
| | DEPARTMENT OF PUBLIC WORKS CENTRAL CEN | J | | | | | | | | |
| BUILDING 42 DELVET VE | APPLICATION FOR BUILDING PERMIT JUL 1 7 1946 | | | | | | | | | |
| ~ | ALTERATION GUREAU OF BUILDING INSPECTAL. July 14 194 HERICED | | | | | | | | | |
| | Application is hereby made to the Department of Public Works of the City and County of San Francisco for permission to build in accordance with the plans and specifications submitted herewith and according to the description and for the purpose hereinafter set forth: | o g | | | | | | | | |
| | (1) Location 178 Sea Cliff Ave | | | | | | | | | |
| | (2) For what purpose is present building now used? Residence | • | | | | | | | | |
| | (3) For what purpose will building be used hereafter . Regidence | | | | | | | | | |
| | (4) Total Cost \$.400a00 | | | | | | | | | |
| | (5) Description of work to be done Repair rotten woodwork and replace placter. | | | | | | | | | |
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| * \ \ | | - | | | | | | | | |
| | (6) APPLICANT MUST FILL OUT COMPENSATION INSURANCE DATA ON REVERSE SIDE. | | | | | | | | | |
| 1 | (7) Supervision of construction by Hallnits & DeHards | | | | | | | | | |
| | Address 818 6th St | | | | | | | | | |
| | I hereby certify and agree, if a permit is issued, that all the provisions of the BUILDING LAW, THE RUILDING ZONE ORDINANCES, SET BACK LINE REQUIREMENTS AND THE FIRE ORDINANCES OF THE CITY AND COUNTY OF SAN FRANCISCO and the STATE HOUSING ACT OF CALIFORNIA will be complied with, whether herein specified or not; and I hereby agree to save, indemnify and keep harmless the City and County of San Francisco against all liabilities, judgments, costs and expenses which may in anywise accrue against said city and county in consequence of the granting of this permit, or from the use or occupancy of any sidewalk, street or sub-sidewalk placed by virtue thereof, and will in all things strictly comply with the conditions of this permit. | | | | | | | | | |
| | (8) Architect | | | | | | | | | |
| | Certificate No. License No. | | | | | | | | | |
| | State of California City and County of San Francisco | | | | | | | | | |
| | Address | • | | | | | | | | |
| | (9) Engineer | £85 | | | | | | | | |
| | Certificate No. | , n 1/2 } | | | | | | | | |
| | State of California City and County of San Francisco | : c. (!) | | | | | | | | |
| | Address | ال ال | | | | | | | | |
| 3 | Other than Architect or Engineer | 2 | | | | | | | | |
| 2.3 | Address | 1. 1. 2- | | | | | | | | |
| | (11) Contractor Ballnits & DeFarde | · | | | | | | | | |
| | License No. 76629 License No. E 169 | · (4. | | | | | | | | |
| | State of California City and County of San Francisco | | | | | | | | | |
| | Address S16 6th Si | 10.4 · | | | | | | | | |
| | (18) Owner tra Doyle | 6 3 | | | | | | | | |
| Yes. | Address 178 Sea Cliff Are | # F | | | | | | | | |
| | by Worldellants | 00 | | | | | | | | |
| | Owner's Authorized Agents CTHE DEPARTMENT WILL CALL UP TELEPHONE NO. 4495 | 7 | | | | | | | | |
| | IF ANY ALTERATIONS OR CHANGES ARE NECESSARY ON THE PLANS SUBMITTED. | | | | | | | | | |
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| DE P. THE | BLDG. FORM 3 APPI Coul. 134 FOR PE Pocation 78 Total Cost \$ | Superintendent, Bureau of Building Inspection 1970 1018 3 0 1970 15sued 1018 3 0 1970 |
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| | Bureau of Engineering BHI Struct. Engineering BHI Struct. Engineer Boiler Imspector Art Commission Dept. of Public Health Dept. of Flectricity Redevelopment Agency Parking Authority Approved. & 12 19 28 Provided the following conditions are compiled with: | The approval of this application and issuance of partit applies to specification and issuance specified work only and approval the pure of the pure of the various Bureau of Building Impecton. I agree to comply with all conditions or stipulations of the various Bureau or Departments noted hereon. |
| | Approved: Department of Public Health Approved: Department of Electricity Approved: Art Commission Approved: | Approved: Redevelopment Agency Approved: Parking Authority No portion of building or structure or scaffolding used during construction to be closer than 60° to any wire containing more than 750 volts. See Sec. 385 California Penal Code. |
| | Approved: Zone GPG Setbacks Of Frustwal by the December of Cay for Frustwal by the December of Cay for Set Case of | Approved: Civil Engiaser, Bareau of Building Inspection Approved: Bareau of Engineering |

PERMIT BUREAU F486

THE SEPTIME PROGRAMMENT OF SECURIOR SERVICES

CONSTRUCTION: LENDER

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APPLICATION FOR BUILDING PERMIT

ADDITIONS, ALTERATIONS OR REPAIRS

Application is hereby made to the Department of Public Works of San Francisco for permission to build in accordance with the plans and specifications submitted herewith and according to the description and for the purpose hereinafter set forth:

(1) Location (1) Location /28 (2) Total Cost (\$) (8) No. of Stories. (4) Basement or Cellar (5) Present Use of building. (6) No. of families APPROVAL OF THIS APPLICATION. FOR THE ELECTRICAL WIRING OR RATE PERMIT FOR THE WIRING A (7) Proposed Use of building (9) Type of construction. YES... (must be shown on plot plan if answer is yes.) (11) Any other building on lot (12) Does this alteration create an additional story to the building? .. (14) Does this alteration constitute a change of occupancy (15) Electrical work to be performed ... (16) Plumbing work to be performed ... (17) Automobile runway to be altered or installed. (18) Sidewalk over sub-sidewalk space to be repaired or altered (20) Write in description of all work to be performed under this application: (Reference to plans is not sufficient) NEW CASINETS & COUNTER any. designat name and branch known, construction (21) Supervision of construction by Address 101...WILLIAMS AVENUE (28) Architect or Engineer SAN FRANCISCO 24 Codifornia Certificate No (for design) Address (24) Architect or Enginee (for construction) (25) I hereby certify and agree that if a permit is issued for the construction described in this application, all the provisions of the permit and all laws and ordinances applicable thereto will be complied with. I further agree to save San Francisco and its officials and employees harmless from all costs and damages which may accrue from use or occupancy of the sidewalk, street or subsidewalk space or from anything else in connection with the work included in the permit. The foregoing covenant shall be binding upon the owner of said property, the applicant, their heirs, successors and assignees. MAY Prone 27/-(26) Owner LOUISA 101 WILLIAMS AVENUE SAN FRANCISCO 24, CALIF By Address Authorized Agent to be Owner's Authorized Architect, Engineer or General Contractor.

CERTIFICATE OF FINAL COMPLETION AND/OR PERMIT OF OCCUPANCY MUST BE OBTAINED ON COMPLETION OF WORK OR ALTERATION INVOLVING AN ENLARGEMENT OF THE BUILDING OR A CHANGE OF OCCUPANCY PURSUANT TO SEC. 808 AND 809, SAN FRANCISCO BUILDING CODE, BEFORE BUILDING IS OCCUPIED.

Pursuant to Sec. 304, San Francisco Building Code, the building permit shall be posted on job.

Owner is responsible for approved plans and application being kept at building site.

| SAN FRANCISCO FOR DEPARTMENTAL USE ONLY APPROVED, FOR ISSUANCE: APR 24 1973 DEPARTMENT OF DEPARTMENTAL USE ONLY APR 24 1973 APR 2 4 1973 APR 2 4 1973 DATE FILED APR 24 1973 FILLING FEE RECEIPT NO. 75391 PERMIT NO. ISSUED 376320 DECEMPENT | CITY AND COUNTY OF SAN FRANCISCO DEPARTMENT OF PUBLIC WORKS APPLICATION FOR BUILDING PERMIT ADDITIONS, ALTERATIONS OR REPAIRS APPLICATION IS HEREST MADE TO THE DEPARTMENT OF PUBLIC WORKS OF SAN FRANCE OF SIGNED ON PRAYING WITH THE PLANS AND SPECIFICATIONS SUBMITTED HEREWITH AND ACCORDING TO THE DESCRIPTION AND FOR THE BURPOSE HEREINAFTER SET FORTH (1) STREET ADDRESS OF JOB. (1) STREET ADDRESS OF JOB. (2) ESTIMATED COST. OF JOB. (3) ESTIMATED COST. OF JOB. ON OF EXISTING BUILDING |
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| (4) TYPE OF CONSTR. 1-hr N 2 1(5) NUMBER OF 1(6) NUM | IILDING AFTER PROPOSED ALTERATION MEER OF 107 PROPOSED USE: 1(8) BLDG. CODE 1(9) NO. OF |
| 1 0 2 0 3 0 4 0 5 2 STORIES OF 2 AND | CELLARS: Sence OCCUP. CLASS: T DWG. UNITS |
| (10A) DOES THIS ALTERATION CREATE ADDITIONAL STORY TO BUILDING? NO P CENTER LINE OFFRONT: | (1) AI DOES THIS ALTERATION YES (1) IF YES, STATE CREATE A HORIZONTAL NEW GROUND FILE EXTENSION TO BUILDING? NO PROPERTY SET SOLUTIONS FILE EXTENSION TO BUILDING? |
| (14) WILL SIDEWALK OVER SUB-SIDEWALK SPACE BE YES (15) WILL BUILDING SUB-SIDEWALK SPACE BE EXTEND BEYOND | YES TILIAN IS AUTO SUNWAY YES TILIZI WILL STORET SPACE YES TI |
| REPAIRED OR ALTERED? NO PROPERTY LINE? | YES (1 (21) FIECTRICAL YES (1 (22) PLUMBING YES (1 |
| ON LOT? (IF YES, SHOW NO CHE CONSTITUTE A CHANGE OF OCCUPANCY? | NO C PERIORMED? NO PERFORMED? NO C |
| (23) GENERAL CONTRACTOR RESERVENT | ADDRESS CALIF. LICENSE NO. |
| (24) AACHITECT OR ENGINEER (FOR DESIGN) | OPERS ADDRESS, CALIF. CERTIFICATE NO. |
| (25) ARCHITECT OR ENGINEER (FOR CONSTRUCTION) | ADDRESS CALIF. CERTIFICATE NO. |
| (26) CONSTRUCTION LENDER (ENTER NAME AND BRANCH DESIGNATION IF AN IF THERE IS NO KNOWN CONSTRUCTION LENDER, ENTER "UNKNOWN") | ADDRESS PHONE (FOR CONTACT BY BUREAU) |
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| WINDSTANT NOTICE | |
| IMPORTANT NOTICES No change shall be made in the character of the occupancy or use first obtaining a Building fermit authorizing such change. See Sec. 103, 104.B.I., 104.C., 502, 502.I., San Francisco Building Cade and Sec. 116 | TALE I HEREBY CERTIFY AND AGREE THAT IF A PERMIT IS ISSUED FOR THE CON- |
| No portion of building ar structure or scoffolding used during const to be closer figan 60° to any wire containing more than 750 value. | truction. I CERTIFY THAT IN THE PERFORMANCE OF THE ABOVE WORK I SHALL NOT |
| Pursuant to See 302.A.S. San Francisco Building Code the building | RELATING TO WORKMEN'S COMPENSATION INSURANCE. |
| application being kept at building size | I FURTHER AGREE TO SAVE SAN FRANCISCO AND ITS OFFICIALS AND EM- PLOYEES HARMLESS FROM ALL COSTS AND DAMAGES WHICH MAY ACCRUSE |
| Grade lines as shown on drawings accompanying this application are at to be correct. If actual grade lines are not the same as shown revised a showing correct grade lines, cuts and fills together with camplete de retaining walls and wall foatings required must be submitted to this bur approval. ANY STIPLIATION REQUIRED MERCHAN OR BY COOK WAY AS | ossumed FROM USE OR OCCUPANCY OF THE SIDEWALK STREET OR SUB-SIDEWALK Includes SPACE OR FROM ANTHING ELSE IN CONNECTION WITH THE WORK INCLUDED IN THE PERMIT. THE FORECOING COVENANT SHALL BE BINDING UPON THE OWNER OF SAID PROPERTY. THE APPLICANT, THEIR HEIRS, SUCCESSORS AND ASSIGNERS. |
| ANY STIPULATION REQUIRED HEREIN OR BY CODE MAY BE APPEAL BUILDING NOT TO BE OCCUPIED UNTIL CERTIFICATE OF FINAL COMP IS POSTED ON THE BUILDING OR PERMIT OF OCCUPANCY GRANIED, REQUIRED. APPROVAL OF THIS APPLICATION DOES NOT CONSTITUE APPROVAL FOR THE ELECTRICAL WIRING OR PLUMBING INSTALLATION. | ELETION X Blirardo 6, Majata |

APPROVAL FOR THE ELECTRICAL WIRING OR PLUMBING INSTALLATIONS. A SEPARATE PERMIT FOR THE WIRING AND PLUMBING MUST BE OBTAINED. SEPARATE PERMITS ARE REQUIRED IF ANSWER IS "YES" TO ANY OF ABOVE QUESTIONS (15) (16) (17) (72) (21) or (27). THIS IS NOT A BUILDING PERMIT. NO WORK SHALL BE STARTED UNTIL A BUILDING PERMIT IS ISSUED.

In dwellings all insulating materials must have a clearance of not less than two inches from all electrical wires or equipment.

CHECK APPROPRIATE BOX: OWNER

ARCHITECT

_ ENGINEER.

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AGENT WITH POWER OF ATTORNEY

| SANFRANC | CONDITIONS AND STIPULATIONS | |
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| DEPARTMEN BUILDING INSPE | This Approved plication and issuance of persit applies to specified work only and does not constitute an approval of the building. | DATE: REASON: |
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| . | DEPARTMENT OF CITY PLANNING APPROVED: | NOTIFIED MR. |
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| <u> </u> | PROVED: DEPARTMENT OF PUBLIC HEALTH NO DATE | SON: RIVER STATE OF THE STATE O |
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SAN FRANCISCO DEPARTME

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| SUPERINTENDENT, SE | REAU OF BUILDING INSPECTION |
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| APPLICATION FOR BUILDING PERMIT ADDITIONS, ALTERATIONS OR REPAIRS | CITY AND COUNTY OF SAN FRANCISCO DEPARTMENT OF PUBLIC WORKS |
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IMPORTANT NOTICES ... in the character of the accusancy of authorizing such change. See Servering Code

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APPLICANT'S CERTIFICATION

I HOMEN CERTIFY AND AGREE THAT IF A PERMIT IS ISSUED FOR THE PRIMET THE ALL

LAWS AND ORDINANCES THERETO WILL BE COMPUTED WITH.

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HOLD HARMESS CLAUSE. The Permitted to by acceptance indemnify and held harmbess the City and Country of San any and all clears, demands and accent the demoges read only and any apparation of negative permit regardless of negative permit and country of San Francis and Country of San Francis and Country of San Francis.

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| If the image of this document appears less sharp than this notice, it is due to the quality of the original. | Acceptance of the control of the con | APPROVED: BUILDING INSPECTOR, BUR, OF BLDG, INSP. APPROVED: YROU BOITTO | DATE: REASON: NOTIFIED MR. DATE: REASON: |
| - | | DEPARTMENT OF CITY PLANNING | NOTIFIED MR. |
| | | APPROVED: BUREAU OF FIRE PREVENTION & PUBLIC SAFETY | DATE: REASON: REASON: REASO |
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APPLICATION FOR BUILDING PERMIT

ADDITIONS, ALTERATIONS OR REPAIRS

FORM 3 COTHER AGENCIES REVIEW REQUIRED

FORM 8 OVER-THE COUNTER ISSUANCE

Viviento La DIRECTORICHIEF BUILDING OFFICIAL DEPT OF BUILDING INSPECTION

CITY AND COUNTY OF SAN FRANCISCO DEPARTMENT OF BUILDING INSPECTION

APPLICATION IS HEREBY MADE TO THE DEPARTMENT OF BUILDING INSPECTION OF SAN FRANCISCO FOR PERMISSION TO BUILD IN ACCORDANCE WITH THE PLANS AND SPECIFICATIONS SUBMITTED HEREWITH AND ACCORDING TO THE DESCRIPTION AND FOR THE PURPOSE HEREINAFTER SET FORTH.

NUMBER OF PLAN SETS ♥ DO NOT WRITE ABOVE THIS LINE ♥ (1) STREET ADDRESS OF JOB BLOCK & LOT 5/4/10 178 SEA CLIFF AVENUE 306 (2A) ESTIMATED COST OF JOB 210989 (28) REVISED COST 10 18,000

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| MSI PROPER LEGACE AND | | | | | DOCTOR | | | | | | | | | |

FUSCO TRUST, 178 SEA CLIFF AVE. SAN FRANCISCO 94121

SEE ATTACHED TERMITE INSPECTION #10150, ITEM #1 REPAIR DRYRST BEHIND STUCO

AT SLOINE CHASS DOOR AND AT REAR LEFT GRACE. REPIACE SLIPING GIANS

ADDITIONAL INFORMATION

OFFICE COPY

DOUR IN KIND

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APPLICATION NUMBER

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FOR ISSUANCE

(26) CONSTRUCTION LENGER (ENTER NAME AND BRANCH DESIGNATION IF ANY, IF THERE IS NO KNOWN CONSTRUCTION LENDER, ENTER "LINKNOWNY)

IMPORTANT NOTICES

Pursuent to Sen Francisco Building Code, the building permit shall be posted on the job. The overlay is responsible for approved plans and application being test at building site.

ide lines as shown on drawings accompanying this application are assumed to be come all grade lines are not the same as shown revised drawings showing correct grade lines if this together with complete details of retaining waits and wall footings regulared must be milled to this department for approval.

ANY STIPULATION REQUIRED HEREIN OR BY CODE MAY BE APPEALED.

BUILDING NOT TO BE OCCUPIED UNTIL CENTIFICATE OF FINAL COMPLETION IS POSTED ON THE BUILDING OR PERMIT OF OCCUPANCY GRANTED, WHEN REQUIRED.

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THIS IS NOT A SUILDING PERMIT. NO WORK SHALL BE STARTED UNTIL A BUILDING PERMIT IS USBLED.

CHECK APPROPRIATE BOX
COMMER ARCHITECT
LESSEE ASSENT
CONTRACTOR ENGINEER

APPLICANT'S CERTIFICATION

I HERIERY CERTIFY AND AGREE THAT IF A PERMIT IS INSUED FOR THE CONSTRUCTION
DESCRINGO IN THIS APPLICATION, ALL THE PROVISIONS OF THE PERMIT AND ALL LAWS
AND ORDINANCES THERETO WILL BE COMPLIED WITH,

9003-03 (REV. 1/02)

NOTICE TO APPLICANT

HOLD HARMICES CLAUSE. The permitted by acceptance of the permit, egree(s) to indemi-hold harmices the City and County of San Francisco from and against any and all claim, demar-actions for demagner shoulding from operations under this permit, repartitives of regligence of the County of San Francisco, and too seques the determs of the City an County of San Francisco as such claims, demands or actions. oe of the City are

ermity with the provisions of Section 3800 of the Labor Code of the State of California, the st shall have coverage under (f), or (fi) designated below or shall indicate learn (lit), or (iv), or (v), are lauppinable. If however liter (iv) is chacked from (iv) must be chapted sevel, Maprit the late method of compilance below.

affirm under penalty of perjury one of the tollowing declarations

ADDRESS

I have and will maintain a certificate of consent to self-insure for worker's compensation, as provided by Section 3700 of the Labor Code, for this performance the work for which this permit is lessed.

There and will maintain worken; compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workens compensation insurance openies and policy number sec:

CarriesSTATE COMPENSATION INSURANCE FUND

757-1012-09

III. The cost of the work to be done is \$100 or less

IV. 1 carrily that in the performance of the work for-which this permit is leased, I shall not emple any person in any restrict on as to become unbject to the workers' compensation time of Cellionia, I further attinovisedge that I understand that in the event that I should become unbject to the workers' compensation provisions of the Linbor Code of Cellionia and last to comply furthwish with the provisions of Section 2000 of the Linbor Code, that the permit herein applied for shall be deemed revided.

V. I certify as the owner (or the agent for the owner) that in the performance of the work for which this permit is bessed. I will employ a confinctor-who complies with the increase' compresention terms of California and who, prior to the convencionment of any work, will like a borylolised copy of this burylinks the Cariton Permit Bureau.

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| O E P A R T | M E N INSPE | T O F TION | IRENE WONG, DE | REASON: |
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| | | | BUILDING INSPECTOR, DEPT, OF BLOG, INSP. | NOTIFIED MR. |
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| | | | MECHANICAL ENGINEER, DEPT OF BLDG. INSPECTION | NOTIFIED MR. |
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| | | | CIVIL ENGINEER, DEST. OF BLDG INSPECTION | NOTIFIED MR. |
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| | | <u> </u> | HOUSING INSPECTION DIVISION | NOTIFIED MR. |

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ARCHITECTURE
PLANNING & RESEARCH
PRESERVATION TECHNOLOGY

www.page-turnbull.com

417 S. Hill Street, Suite 211 Los Angeles, California 90013 213.221.1200 / 213.221.1209 fax 2401 C Street, Suite B Sacramento, California 95816 916.930.9903 / 916.930.9904 fax 417 Montgomery Street, 8th Floor San Francisco, CA 94104 415.362.5154 / 415.362.5560 fax

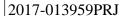




DISCRETIONARY REVIEW PUBLIC (DRP) APPLICATION

JAN 2 8 2020

| Discretio | onary Review Requestor's Information | | CITY & COU | NTY OF | |
|--|--|---|--|--------------------|--|
| Name: | Mountain Lake Properties, LLC | | PANNING | 10 | |
| Address: | 164 Seacliff Avenue, SF 94121 | Email Address: | | | |
| Informa | tion on the Owner of the Property Being Developed | · | | | |
| Name: I | Dan Friis | | | | |
| Company | /Organization: | | | | |
| Address: | 178 Seacliff Avenue, SF 94121 | Email Address: Telephone: 415- | 674-5554 | | |
| | Information and Related Applications | | | | |
| Project Ad | dress: 178 Seacliff Ave. | - | | NAME OF PERSONS AS | |
| Block/Lot(| s): 1306/017 | *************************************** | | | |
| Building Pe | ermit Application No(s): 201710231990 | | | | |
| ACTIONS | S PRIOR TO A DISCRETIONARY REVIEW REQUEST | | | | |
| Province and the Commission of the Section of the S | PRIOR ACTION | оринальный учет на 1446 брогодую Салин Ланана Аруст Аруст Арастического посторований на 1970 году. | YES | NO | |
| Have you | discussed this project with the permit applicant? | Maket his Cruss count on the 1997 of the thin user years (construction of the Arthur Arthur vision as a re- | ergenistada ketamerenista e-33 perdesa | | |
| Did you di | scuss the project with the Planning Department permit review | v planner? | | | |
| Did you pa | articipate in outside mediation on this case? (including Comm | unity Boards) | | | |
| If you have (| Made to the Project as a Result of Mediation. discussed the project with the applicant, planning staff or gone throu hade to the proposed project. | gh mediation, please summar | rize the result, including a | ny changes | |
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DISCRETIONARY REVIEW PUBLIC (DRP)

APPLICATION

| Discreti | onary Review Requestor's Information | | | |
|------------|--|--|-----------------|-------------|
| Name: | Mountain Lake Properties, LLC | | | |
| Address: | 164 Conslift Avanua SE 04121 | Email Address: | | |
| | 164 Seacliff Avenue, SF 94121 | Telephone: | | |
| Informa | ation on the Owner of the Property Being Develope | ſ | | |
| Name: | Dan Friis | | | |
| Company | y/Organization: | | | |
| Address: | 178 Seacliff Avenue, SF 94121 | Email Address: | | |
| | 176 Seaciiii Avenue, SI 94121 | Telephone: 415-674-55 | 54 | |
| Propert | y Information and Related Applications | | | |
| Project A | ddress: 178 Seacliff Ave. | | | |
| Block/Lot | t(s): 1306/017 | | | |
| Building I | Permit Application No(s): 201710231990 | | | |
| ACTION | NS PRIOR TO A DISCRETIONARY REVIEW REQUEST | | | |
| | PRIOR ACTION | | YES | NO |
| Have you | u discussed this project with the permit applicant? | | | |
| Did you | discuss the project with the Planning Department permit revie | w planner? | | |
| Did you | participate in outside mediation on this case? (including Comr | nunity Boards) | | |
| If you hav | s Made to the Project as a Result of Mediation. re discussed the project with the applicant, planning staff or gone thro made to the proposed project. | ugh mediation, please summarize the resu | lt, including a | nny change: |
| No med | liation has occurred. | | | |
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DISCRETIONARY REVIEW REQUEST

In the space below and on seperate paper, if necessary, please present facts sufficient to answer each question.

1. What are the reasons for requesting Discretionary Review? The project meets the standards of the Planning Code and the Residential Design Guidelines. What are the exceptional and extraordinary circumstances that justify Discretionary Review of the project? How does the project conflict with the City's General Plan or the Planning Code's Priority Policies or Residential Design Guidelines? Please be specific and site specific sections of the Residential Design Guidelines.

We are requesting Discretionary Review because the proposed design of the new house at 178 Seacliff Ave. will result in an exceptional departure from the design elements of neighboring homes which, together, form one of the City's unique residential districts. The Sea Cliff neighborhood is comprised of large single-family homes in the "French/Mediterranean, Spanish Revival, Edwardian, and hybrid Arts & Crafts/Tudor styles." The original Sea Cliff design guidelines provide for a "high level of architectural consistency" throughout the neighborhood. The City's Design Principles require projects to incorporate architectural features that enhance a neighborhood's character. (Design Guidelines, Ch. V, p. 31.) Because the proposal incorporates modern and minimalist elements, this project is inconsistent with this neighborhood. The proposed house is more than twice the size of the existing home and would dramatically expand the residence footprint and reduce or eliminate the setbacks required under the Planning Code. (See S.F. Planning Code, §§ 133, 134.) Please see the attached letter to the Planning Department. Also, please see the photographs in Attachment A.

2. The Residential Design Guidelines assume some impacts to be reasonable and expected as part of construction. Please explain how this project would cause unreasonable impacts. If you believe your property, the property of others or the neighborhood would be unreasonably affected, please state who would be affected, and how.

The Planning Department's Historical Resource Evaluation Response noted that Sea Cliff has been identified as an eligible historic district. The new modern home at 178 Seacliff would clash with the neighboring homes designed in the traditional motifs characteristic of the neighborhood and standards regarding size, style, scale, and setback. (Design Guidelines, Ch. II, pp. 7-9.) In particular, the sheer size of the project and reduction of setbacks will compromise its neighbors' sense of light and privacy. (Id., Ch. III, p. 16.) With no setback on the western side of the property, the neighboring residence will be separated from the project by only 8'6". Finally, the expansion of the structure's footprint into the rear yard by 62% will diminish neighbors' views of the Golden Gate Bridge and Baker Beach. Also, the house is out of scale with the size and mass of the existing homes on both sides of Seacliff. For more details, please see the narrative in Attachment B.

3. What alternatives or changes to the proposed project, beyond the changes (if any) already made would respond to the exceptional and extraordinary circumstances and reduce the adverse effects noted above in question #1?

First, the applicant can reduce the mass of the project by respecting the setbacks mandated by the Planning Code Sections 133 and 134. Reducing the footprint, especially in the rear, will ensure that each of the project's neighbors' access to light and views are preserved. Next, the applicant can redesign the house to incorporate some of the traditional elements found in the Sea Cliff neighborhood. Ideally, the project would place windows and doors symmetrically and incorporate features that harmonize the building with neighboring residences as well as provide for a more traditional architectural style as compared to a modernist cube.

DISCRETIONARY REVIEW REQUESTOR'S AFFIDAVIT

Under penalty of perjury the following declarations are made:

| EN/N- | | BRAEDEN MANSOURI | | |
|---|--------------|-------------------------|--|--|
| gnature | | Name (Printed) | | |
| attorney | 415-227-3516 | bmansouri@buchalter.com | | |
| lationship to Requestor Attorney, Architect, etc.) | Phone | Email | | |
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By: _

Date: _

January 27, 2020

Alicia Guerra Shareholder Buchalter, A Professional Corp. 55 2nd Street, Suite 1700 San Francisco, CA 94105

Re: Letter of Authorization

I, Lance Geertsen, hereby authorize Ms. Alicia Guerra and Mr. Braeden Mansouri with Buchalter to communicate with the San Francisco Planning Department, on my behalf. Ms. Guerra and Mr. Mansouri have my authorization to submit a Request for Discretionary Review of the 178 Seacliff Avenue Building Permit application to the San Francisco Planning Department on behalf of Mountain Lake Properties LLC.

Thank you for your attention to this matter.

Best regards,

Lance Geertsen

Manager

Mountain Lake Properties LLC

ATTACHMENT A





















January 27, 2020

55 Second Street Suite 1700 San Francisco, CA 94105 415.227.0900 Phone 415.227.0770 Fax

415.227.3508 Direct aguerra@buchalter.com

Sylvia Jimenez Senior Planner San Francisco Planning Department 1650 Mission Street, Suite 400 San Francisco, CA 94103

Re: Request for Discretionary Review of Building Permit Application –

178 Seacliff Avenue

Dear Sylvia:

Thank you for the opportunity to comment on the pending building permit application for 178 Seacliff Avenue. Earlier this month, my client Mountain Lake Properties LLC, a California limited liability company ("Client"), the owners of the home at 164 Seacliff Avenue, received a Form 311 notice (the "Notice") for the proposed construction activity at 178 Seacliff Avenue. The Notice indicates that the homeowner at 178 Seacliff Avenue plans to demolish the existing home and construct a new three-story over basement single-family residence at that address (the "Project").

The purpose of this letter is to advise you that I have submitted the enclosed Request for Discretionary Review of the 178 Seacliff Avenue building permit on behalf of my Client. The proposed design of the new structure will result in an exceptional departure from the design elements of neighboring homes which, taken together, form one of the City of San Francisco's (the "City") unique residential districts worthy of historic preservation. Accordingly, my Client requests that the Planning Commission exercise control over the 178 Seacliff Avenue building permit because exceptional and extraordinary circumstances exist as further discussed below and in the attached application.

The application of the City's standard Residential Design Guidelines here results in a new contemporary building out of scale and incompatible with the existing neighborhood character.

buchalter.com

Los Angeles Napa Valley Orange County Portland Sacramento San Diego San Francisco Scottsdale Seattle

Sylvia Jimenez January 27, 2020 Page 2

The Notice that my Client received earlier this month was the first and only opportunity my Client and its neighbors have had to review the proposed Project plans. Based on our review, the new home incorporates modern and minimalist elements better suited for some of the City's newer communities, but not for an existing eclectic neighborhood. The architect has proposed a gray three-story cube seated upon a recessed, one-story pedestal according to renderings of the new building. Windows and balconies are of irregular shapes and are placed asymmetrically across the structure. As proposed, the new residence is incompatible with the Seacliff neighborhood, which boasts homes of similar, yet more traditional, materials, style, massing and scale. Thus, a concrete cube does not conserve the more traditional design of the existing neighborhood.

The New Building at 178 Seacliff Would Compromise the Integrity of the Seacliff Historic District.

As provided in the City's Historical Resource Evaluation Response concerning the new building at 178 Seacliff, the Sea Cliff neighborhood is comprised of large single-family homes in the "French/Mediterranean, Spanish Revival, Edwardian, and hybrid Arts & Crafts/Tudor styles." The original Sea Cliff design guidelines provide a "high level of architectural consistency" throughout the neighborhood. Although Planning Department staff did not conclude the existing structure at 178 Seacliff Avenue to be of individual historic import, the building is eligible for inclusion on the California Register as "a contributor to the potential Seacliff historic district." Contributor homes embody the "massing, design, and materiality" characteristic of early Sea Cliff homes. Indeed, the Planning Department even concluded that the "overall design of" the Project proposal "is not compatible with the character of the eligible district." That is, a three story cube does not look anything like the smaller one and two story Mediterranean and Tudor style homes that line both sides of Seacliff Avenue.

The Massive Home Obstructs Views for the Seacliff Avenue Residents.

Moreover, the Project also blocks views for my Client at 164 Seacliff and its neighbors immediately adjacent to 178 Seacliff. In January 2019, Shanna McBurney of 190 Sea Cliff, submitted a letter of concern to the Planning Department regarding this Project. In it, she emphasizes the Project's effects on her property's sense of privacy, light, and space. Namely, my Client and its neighbors are concerned that the expansion of 178 Sea Cliff from an area of 4,593 to 11,382 square feet and the abandonment of the proposed structure's setbacks will be out of scale with the neighborhood and compromise the integrity of the Sea Cliff Historic District. Due to the Project's distinctive design, eastern setbacks for floors two and three will incur a 21% reduction compared to the existing structure that will be demolished. The western setback—along Ms. McBurney's home—will be totally eliminated. Meanwhile, the new complex will

Sylvia Jimenez January 27, 2020 Page 3

extend into the rear yard 62% beyond the existing structure's footprint. This dramatic reduction in setbacks will compromise 190 Sea Cliff's privacy, light, and views of the Golden Gate Bridge and Baker Beach. In particular, Ms. McBurney detailed the proposal's impacts to her home's east and north-facing windows in her prior letter to the Planning Department. Unfortunately, those concerns fell on deaf ears when their effects are preventable by respecting the property's existing setbacks.

The New Home Results in Significant Environmental Impacts Warranting Review under CEQA.

Finally, we understand that the Planning Department determined that the Project would be categorically exempt from environmental review under the California Environmental Quality Act (Pub. Res. Code section 21000 et seq.) (CEQA). We agree that environmental review should not be required for a typical single-family home project. But this is not a typical single-family home. It is almost three times the size of the existing residence with a massing and scale that will dominate the street such that the integrity of a historic district will be compromised. As you know, effects on historic resources trigger exceptions to the ability for the City to rely on a categorical exemption and where your own analysis notes that there will be an impact to the historic district, we question how it is that the City was able to conclude no environmental review was required in direct violation of CEQA. (See Pub. Res. Code, § 21084(e); CEQA Guidelines, § 15300.2(f); League for Protection of Oakland's etc. Historic Resources v. City of Oakland (1997) 52 Cal.App.4th 896; Valley Advocates v. City of Fresno (2008) 160 Cal.App.4th 1039.) For all of the reasons identified above, substantial evidence supports a fair argument that the Project will result in significant environmental impacts warranting review under CEQA before the City may issue a building permit.

Exceptional and Extraordinary Circumstances Exist Warranting Discretionary Review.

Accordingly, my Client asks that the Planning Department find that discretionary review of the proposed Project must be conducted by the Planning Commission to determine revisions to the Project so that the new home will be compatible with the architecture, design, massing and scale of the surrounding homes and the Seacliff Historic District. We encourage the Planning Commission to send the Project architect back to the drawing board to redesign the new home so that it is compatible with the surrounding eclectic architecture of Seacliff Avenue, especially as it relates to style, size, and setbacks. While my Client is not opposed to the demolition of the existing residence and new construction at the site, my Client and many of its neighbors encourage a design that respects the integrity of the existing historic neighborhood. The Project should incorporate architectural features that enhance the neighborhood's character pursuant to the City's Design Principles and the features that are unique to Seacliff Avenue.

Sylvia Jimenez January 27, 2020 Page 4

If, however, the Planning Commission declines to remand the Project back to the Planning Department to work with the architect to revise the plans to be more in keeping with the Seacliff neighborhood, then the Planning Commission has no other choice but to conduct environmental review of the Project in accordance with CEQA before the Project may proceed and through that process, evaluate the impacts and identify mitigation measures to rectify those impacts before the issuance of a building permit.

We respectfully request that the Planning Commission review this application because the proposed Project design is inconsistent with one of San Francisco's historically significant neighborhoods. As designed, the proposal is incongruous with the surrounding properties. The Planning Department notes that, since being identified as an eligible historic district, all but one Sea Cliff project have conformed to the neighborhood standards. My Client is concerned that the proliferation of these non-traditional designs will jeopardize Sea Cliff's historic charm. An ideal Project would honor the traditions of the original Sea Cliff visionaries, harmonizing traditional neighborhood themes with trends of the twenty-first century.

Respectfully,

BUCHALTER

A Professional Corporation

Alicia Guerra Shareholder

AG:mc

Attachments





Marsha Garces Williams 540 El Camino Del Mar

Sylvia Jimenez Senior Planner - San Francisco Planning Department 1650 Mission Street, Suite 400 San Francisco, CA 94103

Re:178 Seacliff Avenue Building Permit Request for Discretionary Review

Dear Ms. Jimenez,

I am writing to comment on the building permit application for the new house at 178 Seacliff Avenue, and to support Mountain Lake Properties, LLC January 27, 2020 Request for Discretionary Review. I have lived at 540 El Camino Del Mar for 30 (thirty) years and am concerned about the impact of the proposed new house at 178 Seacliff Avenue on my neighborhood.

While we welcome and encourage home renovations in our neighborhood, the new house proposed for 178 Seacliff Avenue defies the traditional aesthetic found among the homes that characterize the Sea Cliff neighborhood. Unless modified, the project will result in an ultramodern two-story block, situated upon a recessed one-story pedestal. As our neighbors commented in their request for Discretionary Review, the minimalist design and asymmetric features dramatically depart from the Mediterranean, Spanish Revival, Edwardian, and hybrid Arts & Crafts/Tudor architectural styles found among the homes of the neighborhood. Additionally, the applicant proposes to increase the size of the home by 250% by dramatically reducing property setbacks. Imposing structures like this are out of place in the Sea Cliff neighborhood known for its charming cliff-side homes.

While this building does not directly impact me, or my view, I am concerned about the impact on the neighborhood and the loss of the charming character of the local buildings. These ultra modern types of buildings seem to be taking over, and frankly, I do not feel they fit into the area. I also believe the loss of setback as proposed sets a terrible precedent.

My hope is that the applicant can retool the project design and propose one that comports better with neighborhood traditions. Therefore, I respectfully ask that the Planning Commission review the proposal and request the applicant to redesign their house so it better conforms to our neighborhood, and avoids the impacts to the view from our house.

Sincerely, Marsha Garces Williams

Deborah Lee Minor

250 Sea Cliff Avenue San Francisco, CA 94121 415.668.5868

January 28, 2020

Sylvia Jimenez Senior Planner San Francisco Planning Dept. 1650 Mission Street, Suite 400 San Francisco, CA 94103

RE: 178 Sea Cliff Avenue
Building Permit Request for Discretionary Review

Dear Ms. Jimenez:

I am writing to comment on the building permit application for the new house at 178 Sea Cliff Avenue and to support Mountain Lake Properties, LLC January 27, 2020 Request for Discretionary Review. I have lived at 250 Sea Cliff Avenue for 23 years and I'm very concerned about the impact of the proposed new house at 178 Sea Cliff Avenue on my home and my neighborhood.

While I welcome and even encourage home renovations in my neighborhood, the new house proposed for 178 Sea Cliff Avenue defies the traditional aesthetic found among the homes that characterize the Sea Cliff neighborhood. Unless modified, the project will result in an ultra-modern two-story block, situated upon a recessed one-story pedestal. As my neighbors commented in their request for Discretionary Review, the minimalist design and asymmetric features dramatically depart from the Mediterranean, Spanish Revival, Edwardian and hybrid Arts & Crafts/Tudor architectural styles found among the homes of the neighborhood. Additionally, the applicant proposes to increase the size of the home by 250% by dramatically reducing property setbacks. Imposing structures like this are out of place in the Sea Cliff neighborhood known for its charming cliff-side homes.

My hope is the applicant can retool the project design and propose one that comports better with the neighborhood traditions. Therefore, I respectfully ask that the Planning Commission review the proposal and request the applicant to redesign their house so it better conforms to our neighborhood.

Sincerely,

Deborah Lee Minor Laborah Jahnnor

330 Sea Cliff Avenue

January 29, 2020

Ms. Sylvia Jimenez Senior Planner San Francisco Planning Department 1650 Mission Street Suite 400 San Francisco, California 94103

Re: Request for DR for 178 Seacliff Avenue

Dear Ms. Jimenez:

We respectfully request the Planning Commission review the proposal for 178 Seacliff Avenue.

Generally, we are in favor home renovations – they keep a neighborhood vital – and we have voiced support formally for Seacliff home renovation projects over the years.

This is the first time we have opposed a home renovation proposal.

In doing so, we note it could be reasonably argued that CEQA § 21084.1 should not apply to "potential" historic districts such as Seacliff until such time as they receive official historic designation. But whether we like it or not, that is the rule and this DR request, outlined below, is based on that rule.

Respectfully submitted,

/s/ Mark Parcella

* * * *

1. The Planning Department Concluded the Project is Incompatible.

The Planning Department concluded that the project is incompatible with the potential Seacliff historic district:

"[T]he overall design of the building is not compatible with the character of the eligible district. The new building will not incorporate design elements identified as character defining to the Sea Cliff historic district, such as stucco cladding, gabled and hipped roof with Spanish Clay tiles, exterior chimneys, and multi-light wood-sash windows. Instead, the proposed modern massing, expressed with a two-story box form above a recessed glass base, contrasts with the traditional massing and sloped roofs common to Revival styles. Additionally, the proposed textured cladding materials of the stacked stone and smooth stone fascia, will be at odds with the smooth stucco finish featuring ornamental detailing common to this neighborhood. Furthermore, the expansive

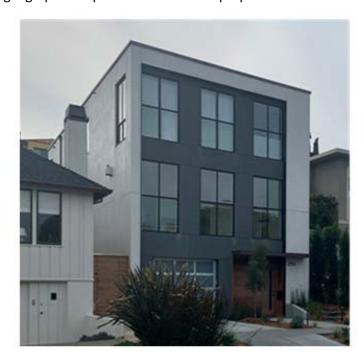
fenestration and abundant use of glass on the proposed building is inconsistent with the pattern of wood-frame, multi-light windows. The modern pattern of openings is further contrasted with the introduction of recessed balconies and glass railings. As proposed, the new building introduces new materials and modern forms that are not compatible with the historic character of the eligible historic district." ¹

2. Cumulative Impact.

The San Francisco Preservation Bulletin ² has a "Cumulative Impact" rule. This rule applies to projects, such as 178 Seacliff, that the Planning Department has determined are incompatible. The rule targets the severity in "adverse cumulative impact" that two nearby incompatible projects can have on a potential historic district. The rule requires an incompatible project's severity on a district not be evaluated in a vacuum, based on that incompatible project's features alone, but rather be evaluated synergistically with other nearby incompatible projects.

The Cumulative Impact rule specifies the rule's geographic scope; that is, how close an existing incompatible "House A" must be to the proposed incompatible "House B" so that Houses A and B are "cumulative." Under the rule, the geographic scope is "visible from the resource." This means if existing House A can be seen from proposed House B, they are "cumulative." Note, the rule did not designate the geographic scope to be the "entire district as a whole." This was for a simple reason. A district is most severely impacted where two incompatible structures are grouped together within sight of each other, compared to being diluted among the larger geography of the entire district.

Newly constructed 255 Seacliff Avenue, pictured below, is visible from 178 Seacliff (four houses away) and thus is within the geographic scope of 178 Seacliff for purposes of the Cumulative Impact rule.



¹ San Francisco Planning Department, 178 Seacliff Avenue Historic Resource Evaluation Response, 2017-013959ENV p. 3 (2017).

2

² San Francisco Preservation Bulletin No. 16, Appendix C, pp. 38-39 (Jan. 31, 2008).

In concluding that 178 Seacliff is incompatible, the Planning Department creates a vivid mental picture: a "two-story box form above a recessed glass base." Juxtaposing that mental picture with 255 Seacliff suggests this is precisely the severe impact on a district the Cumulative Impact rule was intended to prohibit.

3. <u>Demolition of a Work by Master Architect Edward G. Bolles.</u>

The 178 Seacliff proposal is not to demolish an incompatible house and replace it with another incompatible house. It is not even to demolish a compatible house and replace it with another compatible house. Instead, the proposal is to demolish a compatible house and replace it with an incompatible house whose severity on the district is compounded by its "adverse cumulative impact."

And 178 Seacliff is no ordinary compatible house. It was designed by Master Architect Edward G. Bolles.³ This is important because according to the Planning Department:

- A. Seacliff works by Master Architect Edward G. Bolles, in part, are what make Seacliff a California Register-eligible historic district.
- B. Since 2006, when Seacliff was designated a potential historic district, not one contributing Seacliff building has been demolished. Master Architect Bolles' 178 Seacliff, which has stood unmodified and prominently perched over the Pacific Ocean for 106 years, would be the very first.



³ San Francisco Planning Department, 178 Seacliff Avenue Historic Resource Evaluation Response, 2017-013959ENV (2017). Bolles designed famous buildings including the Temple of Religion and the Christian Science Monitor building for the Golden Gate International Exposition in 1939, the grand building at 2360 Pacific Avenue. His son John, who joined Edward's firm in 1936, designed Candlestick Park. Ted Atlas, <u>Candlestick Park</u>, p. 21-23 (2010).

3

Given the Bolles history and prominent location, it is reasonable for the design of 178 Seacliff to warrant particular scrutiny.

Either Seacliff should be a potential historic district or it should not be. It seems inconsistent to conclude Seacliff is an historic district based in part on works by a particular master architect on one hand, and yet demolish and replace his work with a "two-story box form above a recessed glass base" at the other end of the design spectrum on the other hand. ⁴

4. Mitigation.

The San Francisco Preservation Bulletin requires inquiry into whether there are "ways to ameliorate project-specific or cumulative impacts." We are confident 178 Seacliff's highly talented architects will propose mitigating alternatives consistent with the Bulletin's Mitigation provisions.

* * * *

cc: Mr. Lewis Butler
Butler Armsden Architects, Architect of Record for 178 Seacliff

⁴ We reserve on objecting to the demolition itself.

May 27, 2020

55 Second Street Suite 1700 San Francisco, CA 94105 415.227.0900 Phone 415.227.0770 Fax File Number: B2944-0164 415.227.3508 Direct aguerra@buchalter.com

Braeden Mansouri 415.227.3516 Direct bmansouri@buchalter.com

VIA E-MAIL (DAVID.WINSLOW@SFGOV.ORG)

David Winslow, Principal Architect Design Review Citywide and Current Planning San Francisco Planning Department 1650 Mission Street, Suite 400 San Francisco, CA 94103

Re: 178 Seacliff Ave. Conformance with CEQA, Design Guidelines, and U.S.

Secretary of the Interior's Standards for Historic Preservation

Dear David:

Thank you for facilitating our mediation with the project team for the 178 Seacliff Avenue demolition and reconstruction (the "Project"). While we are encouraged that the Project applicant is willing to consider some of my client's concerns regarding the Project, Mountain Lake Properties, LLC does not intend to redesign the house on the applicant's behalf. My client, with support from the surrounding neighborhood, is interested in a modified house design for 178 Sea Cliff Avenue that is compatible with the Sea Cliff neighborhood and avoids adverse effects to the contributing structure to the Sea Cliff Historic District.

In response to your request for further specific comments about the plans for 178 Sea Cliff, I am forwarding a technical memorandum dated May 27, 2020 prepared by Knapp Architects, Mountain Lake Properties architect, which identifies several key considerations that a revised design would need to incorporate in order to maintain compliance with the San Francisco Residential Design Guidelines and the Secretary of Interiors Standards ("Knapp Memorandum"). As we indicated in our Discretionary Review request and discussed in our mediation, and as further discussed in the Knapp Memorandum, the current Butler design results in extraordinary and exceptional circumstances warranting discretionary review because the proposed design results in significant, unavoidable adverse impacts to a historic resource in violation of the California Environmental Quality Act (Pub. Resources Code §§ 21000 et seq.) ("CEQA") and the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties.

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David Winslow, Principal Architect May 27, 2020 Page 2

The project's adverse effects on the Sea Cliff Historic District are undisputed.

The City's own Historic Resource Evaluation Report ("HRER") prepared during the Project review process evaluated the historic nature of the Project's site and setting. The neighborhood's setting, layout, landscaping, and the eclectic architectural revival styles "resulted in [a] neighborhood with a high level of architectural consistency." While a single structure in the Sea Cliff Historic District may not enjoy historic resource protections, each home is a "contributor" to the unique and historic nature of the neighborhood as explained in the HRER and noted in the attached Knapp Memorandum. As also noted in the Knapp Memorandum, the City did not fully evaluate the context that will be affected by the current house design.

The 178 Sea Cliff Project Historic Resource Evaluation states that the Project's overall design, as currently proposed, "is not compatible with the district." It "will not incorporate design elements identified as character defining to the Sea Cliff Historic District." Proposed Project features "will be at odds" with the detailing common to the neighborhood. Since the neighborhood was first identified as eligible for inclusion in the California Register in 2006, "all but one project" have conformed to City standards and no contributing buildings have been demolished. Our client asks why start now? All of the supporting reports the City has relied upon for its review of the current Project design indicate that the demolition of the existing house and replacement with the new building will be incompatible and adversely impact the Sea Cliff Historic District. My client asks that the City consider the Project's impacts as highlighted in the attached Knapp Memorandum and mitigate the adverse impacts on the Sea Cliff neighborhood.

The City's categorical exemption determination itself establishes a fair argument that the Project is subject to further environmental review under CEQA.

Categorical exemptions are reserved for "classes of projects that have been determined not to have a significant effect on the environment." Even projects which may otherwise qualify for a categorical exemption, cannot invoke the exemption when the project "may cause a substantial adverse change in the significance of a historical resource."

Projects that "may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." A substantial adverse change to a historic resource includes "physical demolition" or "destruction" of a resource. 6 CEQA therefore requires lead agencies to "identify potentially feasible measures to

¹ 178 Seacliff Ave. Historic Resource Evaluation Response, Part I.

² 178 Seacliff Ave. Historic Resource Evaluation Response, Part II.

³ Cal. Pub. Res. Code, § 21084(a); 14 Cal. Code Regs. (the "CEQA Guidelines"), § 15300.

⁴ CEQA Guidelines, § 15300.2(f).

⁵ Cal. Pub. Res. Code, § 21084.1.

⁶ CEQA Guidelines, § 15064.5(b)(1).

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David Winslow, Principal Architect May 27, 2020 Page 3

mitigate significant adverse changes in the significance of an historical resource" particularly in the case of demolition of a contributing structure to a historic district.

Indeed, the City's own categorical exemption determination checklist for the Project identified the Property as a "known historic resource" and the neighborhood as the "California Register-eligible Sea Cliff Historic District." Effects on historic resources trigger exceptions to the City's ability to rely on the categorical exemption. Here, even the Planning Department's own analysis notes that there will be an impact to the historic district.

Here, in its 2017 HRE, the City expressly identified that the residence at 178 Seacliff is a contributor to the Sea Cliff Historic District. Thus, any "alterations to the property would [] need to be reviewed for their impact on historic resources under CEQA." The effects of the Project exceed the scope of what is permissible under a categorical exemption, and would require the preparation of an environmental impact report. Moreover, we question how multiple City reports conclude that, despite recent modern renovations to two other properties in Sea Cliff, a review of these cumulative impacts to the historic district was not warranted. Just because there are two modern buildings on Sea Cliff does not mean that the 178 Sea Cliff Project would not have a cumulative impact; in fact, under CEQA, cumulative impacts result from the combined effects of two or more projects (see e.g., 14 Cal. Code Regs. §15130).

As we noted in our Discretionary Review request, we question how the City was able to conclude no environmental review was required when even the HRER itself noted that the City would need to conduct environmental review to evaluate impacts and identify mitigation measures to mitigate the impact to the Sea Cliff Historic District to a less than significant level. Perhaps, the City and the project team can review the specific examples of adverse impacts that the Knapp Memorandum identifies, and go back and revise the house plans to better conform to the City's Design Guidelines and establish compatibility with the Sea Cliff Historic District.

Conclusion

The homes within the Sea Cliff Historic District are defined by their symbiotic relationship—each home provides its own respectful interpretation of the revivalist architectural themes of the neighborhood. Demolishing the existing 1917 house and replacing it with a contemporary cube does not comply with the Secretary of Interiors Standards and the City's Residential Design Guidelines. By contrast, my client is requesting that the City and project sponsor redesign the remodel project to preserve the character defining features of an existing

⁷ *Id.*, § 15064.5(b)(4).

⁸ 178 Seacliff Ave. Historic Resource Evaluation, p. 37.

⁹ See Cal. Pub. Res. Code, § 21084(e); CEQA Guidelines, § 15300.2(f); League for Protection of Oakland's etc. Historic Resources v. City of Oakland (1997) 52 Cal.App.4th 896; Valley Advocates v. City of Fresno (2008) 160 Cal.App.4th 1039.

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David Winslow, Principal Architect May 27, 2020 Page 4

contributing structure to the Sea Cliff Historic District. The attached Knapp Memorandum offers some suggestions that the City and project sponsor should consider in an effort to design a remodel project that would be compatible with the Sea Cliff Historic District and maintain consistency with the Secretary of Interiors Standards.

Sincerely,

BUCHALTER A Professional Corporation

Alicia Guerra Shareholder

Attachment

cc: James Reuben

Tom Tunny Lance Geertsen Frederic Knapp Braeden Mansouri



Memorandum

Date 27 May 2020

Project 178 Sea Cliff Avenue

To Alicia Guerra, Buchalter

From Frederic Knapp

Topic Historical Evaluation

Copied

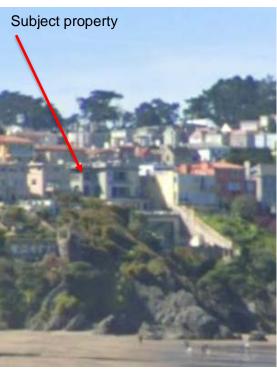
Via e-mail

Introduction

This memorandum has been prepared to offer an overview of previous reviews of the design proposed for a house which will replace the existing house at 178 Sea Cliff Avenue. In addition, this document offers a detailed analysis of the proposed design, focusing on the portion of the building which would be visible publicly from Sea Cliff Avenue. The document begins with a capsule summary of the Historic Resource Evaluation Response Parts 1 and 2 prepared by the San Francisco Planning Department, and then provides a very short overview of relevant provisions of the Secretary of the Interior's Standards for Rehabilitation. Following this, there is an analysis of the proposed design, breaking it down into 15 different aspects and comparing whether they are similar physically to the prevailing condition in the district. Based on this, there is an evaluation of whether the proposed design conforms to the Secretary of the Interior's Standards for Rehabilitation with respect to each of the 15 components of the design, and overall. This memorandum concludes that while six aspects of the proposed design do conform to the Standards, nine of them do not-and under the holistic approach set forth for review under the Standards by the National Park Service and used by many agencies, the proposed design falls well outside the bounds articulated by the Standards for appropriate new construction in a historic district.

Because individual eligibility of the subject property is not being discussed currently, it is not presented in this memorandum. This memorandum points out some of the basic limitations of review imposed by the predicament of the consensus that a potential district exists while a complete survey, context statement, and designation are not available. It is not possible within the scope of this document and the timeframe in which it was prepared to attempt to fill these gaps and suggest the specifics of what the review with such a complete would conclude.

A topic not found in the documents reviewed for this memorandum is whether the cliffs along the ocean and views of the district from Baker Beach and other public vantage points play any role in the significance of the district and would need to be considered in environmental review. Views captured online from Google Maps Street View show that the north slope of the subject property is identifiable from the parking lot at Baker Beach. The proposed design includes a



View of Sea Cliff from Baker Beach. Global Maps Street View.

swimming pool which would apparently cantilever over the cliff, easily visible from Baker Beach.

Documents reviewed

The following documents (all PDF documents provided by Alicia Guerra of Buchalter) were reviewed in preparing this memorandum:

Drawings for the proposed design by Butler Armsden Architects dated 1/21/19, 22 sheets

Historic Resource Evaluation prepared by Page & Turnbull

Historic Resource Evaluation Response Part 1 prepared by San Francisco Planning Department

Historic Resource Evaluation Response Part 2 prepared by San Francisco Planning Department

Certificate of Exemption and Historic Resource Valuation Response for 26 25th Avenue prepared by San Francisco Planning Department, 2007

Historic Resource Evaluation Response (Part I)

Content and Findings

Dated May 2, 2018, the Historic Resource Evaluation Response (HRER) Part I prepared by Preservation Planner Alexandra Kirby is six pages in length and includes a building and property description, a summary of previous historic ratings, and a neighborhood context and description as background information. The CEQA historical resources evaluation section discusses eligibility under the four California Register Criteria for the property both individually and as a contributor to a district. An assessment of historical integrity and a listing of character-defining features follows. The document includes one photograph of the existing house looking northwest from Sea Cliff Avenue. The HRER is based on information in the Historic Resource Evaluation (HRE) previously prepared by Page & Turnbull and found in Planning Department documents and references.

The HRER concludes that the existing house at 178 Sea Cliff Avenue Is not individually eligible for listing in the California Register under any of the four criteria. The property is eligible, however, as a contributor to a previously identified potential historic district. (A "potential" historic district is one that meets the eligibility requirements, but that has not been nominated and formally designated.) The property is eligible as a contributor to the district under Criterion 1 (Events) because "Sea Cliff exemplifies early 20th century 'residence park' design, which reflected the ideals of the City Beautiful movement." The subject property contributes to the significance of the district because it was constructed as part of the first tract of houses and "reflects the general pattern of design and massing." The period of significance is 1913 – 1935.

The HRER also finds that the subject property is eligible as a contributor to the district under Criterion 3 (Architecture), as it was constructed as part of the first tract of development in the neighborhood and reflects that character of the district in massing, design, and materiality.

The HRER finds that the subject property retains all seven aspects of historical integrity under the California. The HRER List the following character-defining features for the potential district:

- Bluff-top location in Sea Cliff neighborhood;
- 2 to 3 story massing with side setbacks:
- · Landscaped front setbacks;
- Mediterranean revival style features, including stucco cladding, gabled and hip roofs with Spanish clay tiles, exterior chimneys;
- Rich eclectic revival detailing such as faux quoins, wood shutters, cartouches, and balconettes;
- Multi light wood sash windows, often with arched openings.

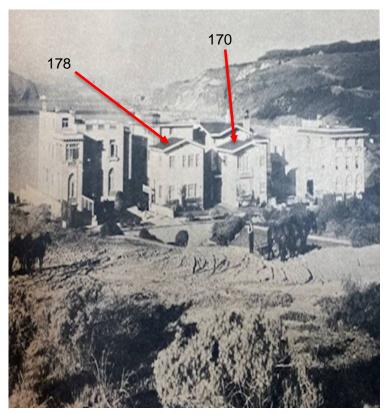
Notes on HRER

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¹ Kirby, Alexandra. HRER for 178 Sea Cliff Avenue. San Francisco Planning Department. San Francisco, 2018.

According to the HRE by Page & Turnbull, there have been numerous HREs or HRERs for properties in Sea Cliff, with multiple documents finding a potential historic district present, but none making the basic documentation for a historic district definitive. The boundaries, period of significance, areas of significance, historic context, theme, and list of contributing and non-contributing properties are all tentative (or unstated) because this is a potential district and not a designated one. CEQA requires lead agencies to treat properties that are eligible for listing the same way as designated historical resources, but conducting a survey and preparing a context statement for a historic district entails much more work and cost than planning departments will typically require an individual homeowner to perform. As a result, "potential" historic districts like Sea Cliff are approached on a case by case basis.

This limitation of background information and evaluation provides a restricted basis on which to make an evaluation. In this case, for example, the HRER provides nearly identical justification for listing the subject property (and, in effect, the district) under both Criteria 1 and 3. The National Register Criteria, on which the California Register Criteria are based, make a clear distinction between significance under Criterion 1 and significance under Criterion 3, but even the basic nuances of this cannot be explored with the minimal information available in the HRER. With more complete research and documentation about the district's eligibility under Criterion 1, one could have more confidence in saying whether 178 Sea Cliff Avenue and 170 Sea Cliff Avenuewhich were owned by brothers who were business partners, were developed by the same company, were designed by the same architect, were built the same year,



View in 1920, looking northeast. Note the similarity in form between 178 and 170 Sea Cliff Avenue.

and employ the same massing device—have special significance as a pair of buildings rather than being simply two houses set next door to each other.

HRER Part 2

Content and Findings

Four pages in length, and dated October 22, 2019, HRER Part 2 was prepared by Preservation Planner Michelle Taylor. The document begins with a summary of the contents of HRER Part 1, including its findings that the subject property is eligible for listing in the California Register as a contributor to the potential historic district for Sea Cliff which is significant under California Register Criteria 1 and 3. The HRER states that the likely boundaries of this district are very similar to what is shown on the San Francisco Property Information Map (see below), with the difference being that the HRER says 28th Avenue would be one of the main north-south legs of the boundary, while the online map moves this to 27th Avenue, making the district slightly larger. The HRER includes a project description and project evaluation, along with a discussion of project impact and cumulative impacts.

The document states that the proposed design will not cause a significant adverse impact on the district. It states that demolition of the existing house on the subject property "will not materially impact the California Register-eligible Sea Cliff historic District." It says the proposed design is not compatible with the district, but will not materially impair it. The proposed design is described as "modern style, using modern finishes and detailing....comprised of two-story boxed volume cantilevered above a recessed ground floor, allowing the building to appear as if it is floating. The modern style of the building is further emphasized through the use of a simple flat roof, stacked Indiana textured stone cladding offset by smooth stone facia belt courses and coping. The geometric language of the building will be further expressed with large rectangular, floor to ceiling openings comprised of both clear anodized-aluminum frame windows and large recessed balconies with glass guardrails." While be height and footprint of the proposed design "are consistent with a pattern of development of the neighborhood, the overall design of the building is not compatible." The HRER enumerates the areas of incompatibility as follows:

"The new building will not incorporate design elements identified as character defining to the Sea Cliff historic district, such as stucco cladding, gabled and hipped roof with Spanish Clay tiles, exterior chimneys, and multi-light wood-sash windows. Instead, the proposed modern massing, expressed with a two-story box form above a recessed glass base, contrasts with the traditional massing and sloped roofs common to Revival styles. Additionally, the proposed textured cladding materials of the stacked stone and smooth stone fascia, will be at odds with the smooth stucco finish featuring ornamental detailing common to this neighborhood. Furthermore, the expansive fenestration and abundant use of glass on the proposed building is inconsistent with the pattern of wood-frame, multi-light windows. The modern pattern of openings is further contrasted with the introduction of recessed balconies and glass railings. As proposed, the new building introduces new materials and modern forms that are not compatible with the historic character of the eligible historic district. "2

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² Taylor, Michelle. HRER Part 2 for 178 Sea Cliff Avenue. San Francisco Planning Department. San Francisco, 2019. Page 3.

The HRER states that the proposed design would not result in a cumulative impact to the district. It says the proposed project "may alter the setting" of the district, but the "overall integrity" of the district will not be affected by the project. The HRER states that since the time the potential district was identified in 2006, all but one project in the area has conformed to the Secretary's Standards and there have been no demolitions of contributing buildings. Taking this into consideration, there would not be a significant cumulative impact to the district.

Notes on HRER

The HRER states that the proposed project "will not materially impact" and "will not materially impair" the district, but the two paragraphs which follow these statements elaborate only on why the proposed design is not compatible with the district and do not explain why it would nevertheless fall below the threshold stated in CEQA Guidelines section 16054.5.

The discussion of impacts does not include discussion about the immediate setting within the district where the project is located, and why replacement of one of the oldest buildings in the district with a one which is not compatible would not impair the integrity of this segment of the district and vitiate its contribution to the significance of the district. It also includes no discussion of the similarities between 170 Sea Cliff Avenue and 178 Sea Cliff Avenue described elsewhere in this memorandum. Without this discussion, it is not possible to understand why the HRER concluded that elimination of two adjoining buildings in the oldest part of the district which share basic characteristics of ownership, development, architect, developer, contractor, and physical form would not cause a significant impact on the historical integrity of the district with respect to its eligibility for listing in the California Register under Criterion 1. The HRE by Page & Turnbull includes a somewhat detailed discussion of the buildings completed and altered since the end of the period of significance of the district. The HRER makes no reference to this discussion in its conclusion that replacing the existing building at 178 Sea Cliff Avenue with a new one (which is not compatible with the district) would not cause a cumulative impact.

Secretary of the Interior's Standards for Rehabilitation

Since the 1960s, the Secretary of the Interior's Standards for the Treatment of Historic Properties have been the foremost guide in the United States for the appropriate treatment of the buildings, landscapes, structures, and districts that are important historically. Promulgated by the National Park Service, the Standards lay out four different treatments: preservation, restoration, reconstruction, and rehabilitation. In assessing a proposal for new construction in a historic district, the Standards for Rehabilitation would apply. The 10 Standards themselves are quite short and intentionally broad, not detailed or prescriptive. Only Standards nine and 10 directly address new construction:

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

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The National Park Service (and numerous other agencies and organizations) have prepared many documents over the past four decades to interpret the Standards and help apply them to specific types of historic properties, projects, and requirements. One of the best-known is the National Park Service publication *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.*3 Although the Secretary's Standards were originally applied to buildings more than any other type of historic property, recent revisions to this document have added quidance for the treatment of historic districts.

A simple imperative relevant to the subject project is included in the introduction to the *Illustrated Guidelines*. Its states that "New additions and related new construction that are either identical to the historic building or in extreme contrast to it are not compatible... ⁴

Only Standard 9 is relevant to the proposed project. (Standard 10 is geared to alterations and new construction which would modify the physical fabric of a historic property. This falls outside the scope of the project under discussion currently.) In addition, as mentioned above, this memorandum addresses only the proposed design for the new building. Whether demolition of the existing contributing building conforms to the Secretary's Standards and whether it is an appropriate treatment for the potential Sea Cliff historic district is beyond the scope of this document.

The Guidelines are structured in a format that discusses various topics, offering a "Recommended" and a "Not Recommended" treatment for each. The most relevant content in the Guidelines pertaining to the new construction in a historic district is the following:

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| Identifying, retaining, and preserving building and landscape features that are important in defining the overall historic character of the setting. Such | Removing or substantially changing those building and landscape features in the setting which are important in defining |

³ https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf

⁴ https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf, page 26.

| 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. | the historic character so that, as a result, the character is diminished. |
|---|--|
| 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. |

Potential Historic District in Sea Cliff

As discussed in the HRER Parts 1 and 2 and in the HRE prepared by Page & Turnbull, the subject property is located in a potential historic district. The Planning Department has determined that a district which is eligible for listing in the California Register of historical resources exists in Sea Cliff. While The Department has determined there is a potential historic district, there has not been an inventory and no context statement has been prepared. According to the HRER, the boundaries of the district have not been finalized, although the San Francisco Property Information Map does show boundaries for the district when the layer California Register Historic Districts is turned on for Sea Cliff. Because a definitive context statement has not been approved by The Planning Department, there is no final list of the contributing properties, character-defining features, area of significance, or period of significance. While documents consulted in preparation of this memo generally were consistent in their discussion of the potential district, there was some variation in



terms of character-defining features and period of significance.

For the purposes of this memo, the following physical conditions and design traits listed in the reference documents will be used in the evaluation of compatibility of the proposed design with the potential historic district:

• An eclectic mix revival architectural styles—French/Mediterranean, Spanish Revival, Edwardian, and a hybrid of Arts and Crafts and Tudor—buildings that "are all similar in

massing and style" so that "considerable harmony" it is created by the "high concentration of architecturally unified buildings."⁵

- 2 to 3 story massing with side setbacks
- Landscaped front setbacks
- Mediterranean revival style features, including stucco cladding, gabled and hip roofs with Spanish clay tiles, exterior chimneys
- Rich eclectic revival detailing such as faux quoins, wood shutters, cartouches, and balconettes;
- Multi-light wood sash windows, often with arched openings

Character-defining features of the subject property are:

- Stepped three-story wood frame structure with rectangular footprint
- Stucco cladding
- Pitched gable roof at the front
- Fenestration: original double hung windows, various tripartite layouts at rear
- Massing, design, and materiality

Analysis of proposed design

This section presents an analysis of proposed design, examining it through individual components and comparing the proposed design with the prevailing nature of the corresponding component in the potential district and/or the existing house at 178 Sea Cliff Avenue in each case.

SITING

Setback from Street

The proposed design appears to match the setback of the existing contributing house and the five adjacent houses to the east.

Setback from Side

The proposed design is similar to the existing siting of the house, except that the proposed building would run to the west property line, while there is a setback of about 3 feet 10 inches on that side now.

Access to House and Garage

The proposed design locates car access on the driveway on the east side of the site as the existing design does. Like the existing house, the proposed design locates pedestrian access on the east elevation.

⁵ Sullivan-Lenane, Tara. HRER for 26 25th Avenue. San Francisco Planning Department. San Francisco, 2007. Page 3.

Landscaping in Front

Like the existing contributing house on the subject property, the proposed design includes a landscape area in front of house. In contrast, however, the proposed design includes a low retaining wall which runs along the edge of the property at the front and returns to the front of the house on its east and west walls. The front yard within this retaining wall appears to be roughly 4'-6" below the grade in front of the house. This low wall is bordered by shrubs along the sidewalk, and visually separates the front yard and landscaping from the rest of the streetscape—an effect which is amplified by the change in grade at the front yard. The proposed drawings reflect this change in character, calling the area a "courtyard" and not a front yard.

Landscaping on sides

The existing house has a brick paved driveway on the east side extending from close to the east wall of the house to the property line and from Sea Cliff Avenue to the garage behind the house. It is nearly level. This treatment appears to be typical for the district. The proposed design would have a 9% slope from Close to the street down to the basement access hatch, which is not dimensioned but appears to be roughly 18 feet long and 7'-6" wide. The drawings do not indicate a retaining wall or guardrail, but the length of the 9% slope suggests that these may be necessary on the east side at the property line. The drawings do not call out the material of the driveway or of the basement access hatch. It is difficult to determine whether the side yard would have the same simple and somewhat utilitarian appearance that characterizes most side yards in the district.

Relationship to Grade

The existing house on the subject property is typical for the district in that its front façade springs directly from grade close to the ground floor level. The proposed design would have a more complex relationship with the grade as seen from the front. The ground floor would be the same grade as the courtyard enclosed by the retaining wall in front of the house—and thus a few feet below the relatively flat and uniform grade of the sidewalk, neighboring front yards, and street. The second floor—which cantilevers from the face of the ground floor—would be about 9'-6" above grade.

BUILDING FORM AND MASSING

Scale

As discussed above, the width of the proposed building is very close to the width of the existing building—which is typical for the district. As shown on the section for the proposed design, the new house would have four interior levels and a roof deck. The existing house is a two-story building at its street façade; the majority of historic houses in Sea Cliff are similar in height. The proposed design depresses the level of the ground floor below grade (with the basement entirely well below grade), which reduces the apparent height of the building as seen from the street. Although the street elevation drawing shows the screen wall at the roof deck, this is set so far back from the front of the house that it would be essentially impossible to see from the

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street. (Note that as explained above, this document does not consider whether views of the district from the north would be affected by the project.) As shown on the front elevation drawing, the proposed house would match its two neighbors in height.

Footprint

Like the existing House on the subject property, the proposed design would have a rectangular footprint. This appears to be common, though not universal, in the district.

Form and Shape

There is some variation in overall building form and siting on the lot in Sea Cliff, primarily associated with the shape and size of the lots themselves. On small lots, the houses tend to be built close to the side property lines and along a uniform setback from the street. On rectangular lots, the buildings tend to be rectangular forms. (On larger lots the houses are sometime set back from the front or a side property line. On irregularly shaped lots, the houses, too, are often irregular in form.) On the largest scale, the proposed design would be a rectangular volume, matching the prevailing condition found in the district on similar lots, and its placement on the lot is fairly typical.

Articulation of Form

The articulation of form in the existing building reflects one nearly universal characteristic in the district and one found in several other houses but not most. Like virtually all the contributing properties in the district, the existing house has expressed termination at the top (in this case the gable roof forms at the front of the house), subtle modulation of form and massing (the projecting bay at the second and third floors over the entry arch on the east elevation), and articulation of major tectonic elements (such as the belt course at the window sill level on the third floor on the east elevation). Interestingly, 178 Sea Cliff Avenue, like its neighbor to the east, 170 Sea cliff Avenue, employs a massing device seen in some other houses in Sea Cliff (and elsewhere, even today) which makes the house appear smaller from the street than it really is. The front façade is two stories high, but at the north (rear) portion of the building, the building Is three stories high. As seen from the street, the house is articulated as two adjoining masses, each with its own roof form. A variation of this device is also used in the massing of 120, 224, and 260 Sea Cliff Avenue, 18 25th Avenue, 620 El Camino del Mar, and 20 Sea View Terrace.

The proposed design would articulate the basic rectangular form of the building using very different devices. The primary one as seen from the street is the offset between the continuous walls of the upper two stories from the south and east walls of the ground floor. From the street, this creates the appearance of a larger mass which cantilevers beyond the walls of the slightly smaller one below it. Another device used in the proposed design to articulate the building's mass is recessed balconies, which modulate the plane of the building walls. (There would be projecting balconies on the north elevation, but these would not be visible from within the district and would not affect the compatibility of this design as reviewed within the scope of previous documents and this memorandum.) Notably, the proposed design would read very much as an orthogonal rectangular form, and would not have any articulation marking its top.

The four houses east of 170 Sea Cliff Avenue on the same side of the street as the subject property exhibit the use of typical architectural devices from the revival styles common to Sea Cliff for marking the top of the building which has a flat roof. This is very different from the approach taken by the proposed design.

COMPOSITION OF BUILDING AND FAÇADES

Order and Hierarchies

Common to the revival architectural styles found in Sea Cliff is a basic approach to how the exterior of the building is designed, especially the relationship among its parts. There is a regularity of the divisions within large elements such as a given façade; important components are articulated clearly from one another; and there is a hierarchy of elements, portions of the building, and the pieces which make up any one major part of the house. Although 178 Sea Cliff Avenue Is a relatively restrained example of period revival design, it exhibits use of these devices. As mentioned above, the massing of the existing building is articulated in two to parts by the limitation to two stories in height on the front portion of the building. The front facade exhibits the combination of balanced unity favored by revival styles visible in the simple front gable roof which terminates the monolithic front façade and the complementary tendency to introduce hierarchy which is seen in the subtle division of the front façade into two unequal bays, one on the west with a single window at each story and a wider one on the east with three windows. On the east elevation, the projecting bay at the second and third stories increases the hierarchy of the entry vestibule, which would otherwise simply be a recessed opening in the elevation. The other contributing houses in the potential district similarly employ architectural devices from the tool kit expounded by Christopher Alexander.

The modernist design of the proposed project exhibits the aesthetic introduced by the International Style in the 20th Century, which was influenced importantly by recent developments in construction technology and also by leading designers' fatigue with the procession of revival styles that characterize Sea Cliff. The proposed building can be expressed as very clear geometric forms that are not compromised visually because of the requirements of construction techniques or building materials. A sense of unity can be derived from the simple and clear geometric shapes, while hierarchy can be established by the offset of the massing of the second and third floors above the ground floor. Modulation of scale (though not at the same scale seen in the existing building) can be seen in but that all the tension between regularity and variety in the size and location of openings.

Fenestration and Openings

There is a clear contrast between the proposed design and the existing building (and the other historic buildings in Sea Cliff) with respect to fenestration and openings. Especially on street façades, the contributing buildings in the district align most openings from story to story, creating regular bays. The great majority of windows are expressed as punched openings. Many windows are divided into multiple lights. On the other hand, the proposed design does not arrange the windows in regular bays, emphasizes large openings which have equal weight visually with the solid wall surfaces on some elevations (especially the north elevation), and do

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not subdivide openings into multiple lights. The proposed design features large aluminum windows and sliding glass doors. Wood windows –most of them double hung or casements–in significantly smaller sizes characterize the district.

Expression of Base, Stories, and Roof

Although neither the subject property nor many of the contributing buildings in Sea Cliff make literal use of the classical order of base—shaft—capital seen in the design of the entry portal of the nearby130 Sea Cliff Avenue, the revival styles that characterize the contributing properties routinely employee tripartite composition in façades. The role of roofs in this design technique becomes clear when one notes how many of the contributing buildings include false roofs which appear from grade to be conventional sloped roofs, but actually terminate a short distance behind the face of the building to conceal a flat roof. Although it is a very simple design, the subject building has a water table which expresses the concept of a base or podium in the façade composition. The walls correspond to the "shaft" and the roof is the "capital." In contrast to this, the street façade of the proposed design is seen either as one large mass "floating" on top of the lesser one, or as a two-part composition—but certainly not as a tripartite composition and.

Scale and Level of Detail and Ornamentation

In general, one of the primary differences between styles drawn from traditional Western architecture and the International Style and its descendants is the use of the ornament and detail and the grain or scale of a building's exterior. Although it is one of the simpler and less adorned contributing buildings in the district, 178 Sea Cliff Avenue has balconettes at all the windows on the front façade, an arched window with a large window box on the east façade over to the main entry, and scrolled brackets supporting the cantilevered bay at the second and third floors on the east elevation. As one of the plainer contributing buildings in the district, 178 Sea Cliff Avenue presents relatively large, unbroken wall surfaces (especially on the front façade), but even it has a water table as well as the belt course below the 3rd third floor windows on the east elevation which break the exterior elevations down into smaller components, creating a sense of grain in the composition of the exterior. This effect is augmented by the regular composition of windows which subdivides the elevations into grids. Many other contributing properties exhibit far greater use of architectural detail and ornamentation which introduce a finer scale within the composition of exterior façades. Similarly, 178 Sea Cliff Avenue shows minimal use of ornamentation, but it does have decorative iron work at the balconettes on the south elevation and scrolled brackets on the east elevation. Some other contributing houses in the potential district far exceed the subject property in the use of ornament.

The proposed design would not have such scale-modulating details, or ornamentation; the street façade as drawn is made up of wall surfaces, windows, and a glass guard rail, all very cleanly detailed and carefully composed without the addition of further extraneous elements.

IMAGERY, MATERIALS, AND DETAILING

Presence of Form, Detailing, and Ornament which Refer to a Revival Style The word revival in the names of many of the styles that characterize Sea Cliff indicates that the antecedent style (typically taken from Europe or the British Isles) was not simply being reemployed in the United States unchanged at the end of the 19th-century and in the beginning of the 20th Century, but rather that in the United States, architects were clothing contemporary construction techniques and building types in the designs that employed the materials, imagery, detailing, and forms of historical styles with associations that appealed to Americans at that time. Essential and integral to period revival styles are the materials, forms, and images which conveyed the reference to the historical styles Americans held in esteem. The existing building at 178 Sea Cliff Avenue Is a very restrained example, but even it includes enough of these references to older styles so that it can fit in among the more ornate houses in the potential district. Relevant features include the second floor windows on the main facade with the smaller upper light and lug sash, the balconettes, the brackets on the east elevation, and the arched window at the second floor over the main entry, and the arched of the entry opening as well as the building's deep eves and relatively large roof fascia. Another characteristic of the existing building which is important to its fitting into the potential district is its stucco exterior. This material is far and away the most common exterior finish found in the potential district.

The proposed design does not share any of the characteristics of the existing building with respect to imagery, materials, or detailing. Obviously, it is not a period revival design, and the use of stone as the exterior material will further differentiate it from the contributing properties in the District.

Evaluation of Proposed Design for Conformance with Secretary's Standards

This section of the memorandum discusses whether the elements of the proposed design enumerated above conform with the Secretary of the Interior's Standards for Rehabilitation with respect to the guidelines for new construction in the potential Sea Cliff historic district. Where the analysis of the proposed design, addressing its individual components, shows that the proposed design matches the character of the district or the existing house on the subject property, this evaluation simply states that the component in question conforms. Where the proposed design differs, this evaluation explains whether the component in question conforms to the Standards.

Siting

Setback from Street
The design conforms to the Secretary's Standards.

Setback from Side

Standard 9 requires that new construction "Will not destroy...spatial relationships that characterize the property." The HRER States that sides setbacks are a character-defining feature of the district. The proposed design does not conform to the Secretary's Standards.

Access to House and Garage

The design conforms to the Secretary's Standards in terms of access to the house and garage.

Landscaping in Front

The statement in the HRER that "landscape front setbacks" are a character-defining feature of the potential Historic District means that front setbacks which share the nature of those found in the district are compatible—it does not mean that any setback of any description that could be characterized as somehow being a "landscape" feature is compatible, no matter how it is designed. The retaining wall which will run from the front of the house to the sidewalk and along the full sidewalk frontage and the significant change in grade in front of the house will make the basic form of the front yard too different from the very consistent front setbacks of other properties to be compatible with the district. The architect's designation of the front zone as a "courtyard" makes clear the transformation that is proposed. This feature does not conform to the Secretary's Standards.

Landscaping on Sides

The existing side yard is a driveway, and even with the proposed alteration in grade and the construction of sizable hatch for a car elevator connecting to the basement, this part of the property would not change enough in character to raise an issue for conformance with the Standards.

Relationship to Grade

The architect's characterization of the second and third floors as "floating" is not a condition that is included in the way buildings are conceived and constructed within the architectural styles referred to in the HRER as a character-defining feature of the district. This feature does not conform to the Secretary's Standards.

BUILDING FORM AND MASSING

Scale

The scale of the design conforms to the Secretary's Standards.

Footprint

The design footprint conforms to the Secretary's Standards.

Form and shape

The design in terms of form and shape conforms to the Secretary's Standards.

Articulation of Form

The proposed design uses devices introduced by the International Style and its architectural successors to develop the basic form of the building into a detailed, complete design. These devices are very different from the ones used by the revival styles that characterize the potential historic district. Standard 9 says that new buildings need to be "Compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment." The way the proposed design articulates the form of the building diverges fundamentally from the way the styles that characterize the district do this. This component of the design does not conform to the Standards.

COMPOSITION OF BUILDING AND FAÇADES

Order and Hierarchies

With respect to this aspect of building design, the proposed design is possibly a better archetype of the way the International Style (and the Modernist architecture it inspired) treated order and hierarchy than the existing building is as an example of how the Arts and Crafts or Tudor Revival style did. The two are intrinsically different in nature. This aspect of the proposed design does not conform to the Standards.

Fenestration and Openings

"Multi – light wood sash windows" are a character-defining feature of the district. The proposed design has windows that are different in material, light pattern, and configuration—and they are composed on the elevations in a way that runs counter to the pattern found on contributing buildings. This aspect of the proposed design does not conform to the Standards.

Expression of Base, Stories, and Roof

The proposed design differs fundamentally in the way the building meets both the ground and the sky from the way this is done by the Arts and Crafts, Tudor Revival, or period revival styles that characterize the district. This feature does not conform to the secretary's Standards.

Scale and Level of Detail and Ornamentation

The proposed design draws on basic principles that run counter to with the ones found in the Arts and Crafts, Tudor Revival, and period revival styles. This aspect of the design does not conform to the Secretary's Standards.

IMAGERY, MATERIALS, AND DETAILING

Presence of Form, Detailing, and Ornament which Refer to a Revival Style Unlike the existing house at 178 Sea Cliff Avenue, the proposed design does not exhibit the vocabulary of form, detailing, and ornament which characterize the styles cited in the HRER for the potential district; the continuity of architectural language these styles have in common is what gives the district the architectural unity and harmony cited in the HRER for 25 26th Avenue. This aspect of the design does not conform to the Secretary's Standards.

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Differentiation

Standard 9 requires that new construction be differentiated from original buildings so that the historical development of a district can be understood in the future. As detailed in the analysis above, the proposed design would conform to the Standards in this respect.

Holistic Evaluation

In principle, when a design or building is evaluated for conformance with the Secretary's Standards, each aspect that is examined should conform to the Standards. However, the purpose of the Standards is not to produce a prescriptive list of checkboxes, each of which must be satisfied. Designs are evaluated holistically and each aspect or factor is weighed based on its overall role. A design which doesn't include a very small number of serious issues under the Standards is often approved if It clearly conforms to the Standards in many, many other respects. On the other hand, a design might not conform to the Standards if it incorporates a single element which is so incompatible with the historic district that it sets the entire building at odds with it—even though countless other aspects of the design are compatible.

The HRER and other documents which address the potential district all emphasize in different ways the architectural consistency of the houses built within a period of roughly two decades, developed by a small number of firms, and designed by a group of architects who played a major role during their era—largely because they shared a common vision of design. The existing house at 178 Sea cliff Avenue fits readily into this context. While the proposed design does conform to the Standards with respect to six of the 15 design factors is the analysis above, it is very far from being a member of the family of buildings that characterize Sea Cliff. The nine aspects of the design which run counter to the common language of the district form a telltale indicating that the proposed design is not compatible under the Secretary's Standards.

The proposed design would fit physically within the module set up by the district for the subject address. However, even though its size and location would not detract from the consistency and order which characterize the district, most everything else about the design would detract from the unity, continuity, architectural identity, and materiality that characterize the district.

Conclusion

The HRERs found that the existing house at 178 Sea Cliff Avenue is eligible for listing in the California Register as a contributor to the potential Sea Cliff District, which is significant under California Register Criteria 1 and 3. The HRER Part 2 found that the proposed design is not compatible with the district, but that demolition of a contributing building and construction on a

new building which is not compatible would not cause a significant impact on the district and would not cause a cumulative impact, either.

While all the environmental review of the proposed design is occurring without the benefit of a complete and official designation of the historic district, some questions arise from the scope and conclusions of the HRERs. It is not clear why the associations between 170 and 178 Sea Cliff Avenue do not bear evaluation. How and why the proposed design falls below the threshold of impact defined in CEQA Guidelines section 15064.5 is not stated. The role of the early buildings on the north side of Sea Cliff Avenue of which 178 is a core property is not discussed. In addition, the scope of review to date does not explain whether the north slope of the subject property and its neighbors is a character-defining feature of the potential district or whether views of the district from Baker Beach and other public digits points should be considered.

Although it is a simple and relatively restrained example, the existing building at 178 Sea Cliff Avenue "speaks the same language" as the other, more ornate, contributing properties in the district—mainly through its hybrid of the Arts and Crafts and Tudor Revival styles. The proposed design would speak a markedly different language, and thus would not conform to the Secretary of the Interior's Standards for Rehabilitation. The impact the proposed design would have on the district bears further consideration.



Re: Discretionary Review of 178 Seacliff Ave.

Planning Commission,

This is regarding the Discretionary Review for the property located at 178 Seacliff Ave.

178 Seacliff Ave is designated by the Planning Department as a Category "A" Historical Resource which is also located in the "Sea Cliff Historical District." The northern boundary of the lot also shares its property line with the "California Coastal National Monument".

This permit application seeks to demolish a historical building within a historical district and replace the building with a design that does not comply with the "Urban Design Elements" listed in the General Plan, including but not limited to:

- Policy 1.3 "Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts."
- Policy 1.7 "Recognize the natural boundaries of districts, and promote connections between districts."

Nor does it comply with the "Housing Elements" listed in the General Plan, including but not limited to:

- Policy 2.1: "Discourage the demolition of sound existing housing, unless the demolition results in a net increase in affordable housing."
- Policy 2.3: "Promote improvements and continued maintenance to existing units to ensure long term habitation and safety."
- Policy 11.1: "Promote the construction and rehabilitation of well-designed housing
- that emphasizes beauty, flexibility, and innovative design, and respects existing neighborhood character."
- Policy 11.2: "Ensure implementation of accepted design standards in project approvals."

Mission Awareness Project asks the commission to consider the following during their review of the project:

• **Retain Façade**: Preserve the Category A façade (south exposure) of the building in order to retain continuity with the "Sea Cliff Historical District".



- **Rear Landscape:** Developing a rear landscape that compliments the natural boundary of the properties lot with the "California Coastal National Monument" the lot shares a boundary with (north exposure).
- **ADU:** Incorporation of an ADU into the project; especially if the demolition of a historical building is approved.

Respectfully,

Mission Awareness Project ("MAP")

REUBEN, JUNIUS & ROSE, LLP

James A. Reuben jreuben@reubenlaw.com

May 28, 2020

Delivered Via Email

President Joel Koppel San Francisco Planning Commission 1650 Mission Street, Suite 400 San Francisco, CA 94103

Re: 178 Sea Cliff Avenue

Brief in Support of Proposed Project

Planning Department Case No. 2017-013959DRP

Hearing Date: June 11, 2020

Dear President Koppel and Commissioners:

Our office is working with Dan Friis ("**Project Sponsor**"), owner of the property located at 178 Sea Cliff Avenue ("**Property**"). The proposed project would demolish the existing home at the Property and replace it with a new, three-story over basement home designed by Lewis Butler ("**Project**"). The imaginative design of the new home is contemporary, but also expresses the traditional elements of Sea Cliff. The home is appropriately notable, yet understated, for this iconic San Francisco location. Renderings of the Project are attached as Exhibit A.

A neighbor two properties to the east, at 164 Sea Cliff Avenue, has filed an application for discretionary review ("**DR**") of the Project. The Project has no light, air or privacy impacts on the DR requester, or other neighbors, and is consistent with the Planning Code and the Residential Design Guidelines. We respectfully submit that the DR request should be denied and the Project approved as proposed for the following reasons:

• The Project's design intent is to express individuality while remaining contextual for the neighborhood. The Project continues the massing, height and setbacks of neighboring properties. The proposed mature landscaping is typical, and will soften the façade. Considerable attention was given to the type of stone, and how the stone coursing works, to add detail through the subtle handling of a natural material. This stone cladding will produce subtle shadows, softening the appearance of the house, and reflecting the mediterranean light of the Sea Cliff neighborhood. The Project's stone complements the stucco finishes common in the neighborhood; stucco is intended to mimic stone. The use of glass and its transparency responds to the breathtaking location on the cliff overlooking the ocean.

- Sea Cliff possesses a diverse architectural heritage including Mediterranean, Craftsman, Edwardian, and Tudor styles. Sea Cliff was first developed in the 1910s and 1920s, but it has evolved with numerous houses added in the 1940s, 50s and into the present. The newer houses have contributed to an even more diverse neighborhood with modern and California mid-century styles. Regardless of style, Sea Cliff is best defined by single-family homes that are individually designed and convey high architectural merit. The Project continues this design tradition. The Residential Design Guidelines (RDGs) provide that [i]n areas with a mixed visual character, design buildings to help define, unify and contribute positively to the existing visual context. (RDGs at p. 10.) The Project design has achieved that.
- The DR requester cannot identify light, air, or privacy impacts because none exist. Sea Cliff is the lowest-density zoning district in the City, and this huge Property (7,325 square feet), three times the size of a typical lot, affords ample space for the Project. The DR requester states that the Project violates Planning Code setback and yard requirements, but that is incorrect. The Project complies with all height, setback, yard, and massing controls in the Planning Code and RDGs. The proposed height, 30', is well within the 35-foot height limit and matches the height of neighboring properties. The floor area, 8,066 sq. ft., is typical for homes in this part of Sea Cliff. The DR requester grossly overstates the floor area as 11,385 square feet. The DR requester's home is three stories and 7,752 square feet. Planning Department Staff has concluded that "the height and footprint of the proposed building are consistent with the pattern of development of the neighborhood." (HRER Part II, p. 3, Exhibit B.)
- The DR requester is concerned primarily with views, but views are not protected as a matter of code or policy in San Francisco. Notwithstanding this clear rule, the Project was sensitively designed to minimize impacts on neighbors' views.
- The Project's Categorical Exemption under the California Environmental Quality Act (CEQA) was properly issued. Planning Department Staff determined that the existing building is a contributor to the California Register-eligible Sea Cliff Historic District. Staff also determined that the demolition of the building and construction of the new home would not alter the overall integrity of the District. There are approximately 300 homes located in the District, of which approximately 230 are considered potential contributors to the District. In the last 14 years, there have been no demolitions of contributing buildings within the boundaries of the District. The District is too big and well-preserved to be materially impacted by the Project.

For all of these reasons, we submit that no exceptional or extraordinary circumstances exist that would justify the exercise of discretionary review and modification of the Project.

I. PROJECT DESCRIPTION

The Property is located on one of the most unique blocks in the City, on the bluff in Sea Cliff, overlooking the Marin Headlands and Pacific Ocean. The lot area is 7,325 square feet.

The Project would demolish the existing three-story home and construct a new three-story home over basement, with a floor area of 8,066 square feet. The new home is set back more than 15' from the front property line, 8'-6" from the east side property line, and the rear building wall is over 30' short of the 25% rear yard limit.

The front yard will have mature landscaping, which is common in the neighborhood.

The rendering below shows the front façade from the southwest.



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Rear decks at the second and third levels are cantilevered off the rear building wall to reduce massing and impacts on views. The rendering below shows the rear façade from the north east.



II. THE STANDARD FOR DISCRETIONARY REVIEW HAS NOT BEEN MET

Discretionary review is a "special power of the Commission, outside of the normal building permit approval process. It is supposed to be used only when there are exceptional and extraordinary circumstances associated with the proposed project." The discretionary review authority is based on Sec. 26(a) of the Business & Tax Regulations Code. Pursuant to the City Attorney's advice, it is a "sensitive discretion ... which must be exercised with the utmost restraint." Exceptional or extraordinary circumstances have been defined as complex topography, irregular lot configuration, unusual context, or other circumstances not addressed in the design standards.

As described in detail below, the DR requestor (and the neighbor letters attached to the request) have failed to establish any exceptional or extraordinary circumstances that are necessary for the Planning Commission to exercise its DR power. As such, the request for DR should be denied. The DR request and neighbor concerns are addressed as follows.

¹ Planning Department publication for the Application Packet for Discretionary Review; emphasis added.

A. The Project's Design Is Intended to Both Differentiate and Derive from the Existing Neighborhood Character

The DR requester argues that the Project's design is inconsistent with the neighborhood, which is therefore an exceptional and extraordinary circumstance. The existing neighborhood character is mixed, including Mediterranean, Craftsman, Edwardian, and Tudor styles. Newer houses have contributed to an even more diverse neighborhood with modern and California midcentury styles. Regardless of style, Sea Cliff is best defined by single-family homes that are individually designed and convey high architectural merit.

When a neighborhood's character is mixed, as is the case here, the RDGs call for the design to capture themes of the neighborhood design. The Project's massing, footprint, materials, colors, fenestration, and landscaping all derive from common elements in the neighborhood, while still expressing individuality and contributing positively to the neighborhood. This is consistent with the following provisions of the RDGs:

- "In areas with a mixed visual character, design buildings to help define, unify and contribute positively to the existing visual context." (RDG at p. 10.)
- "Some block faces do not have an apparent overriding visual character, or the character may be mixed or changing. When no clear pattern is evident on a block face, a designer has a greater opportunity and responsibility to help define, unify, and contribute positively to the existing visual context. Designs should draw on the best features of surrounding buildings." (RDG at p. 10.)
- "Neighborhoods with a mixed visual character may exhibit a broader range of details, but usually have some common theme...." (RDGs at p. 43.)

At least 70 homes in the neighborhood were constructed after the Historic District's "period of significance", which was 1913-1935. Attached as Exhibit C is a context survey that shows each of these homes and their location in the District. The survey shows that Sea Cliff is not a static neighborhood, but has been developed continually with numerous new houses and substantial remodels until the present day. The new construction and substantial remodels over the decades since the 1930s have established an architecturally-varied neighborhood that spans the Original Revival and Mediterranean architectural styles, with California contemporary and other modern styles.

B. The New Home Is Consistent in Massing and Footprint with Neighboring Homes; Views Are Not Protected

The DR requester calls the proposed home "massive" and "out of scale" with the neighborhood. This is incorrect. Planning Staff has concluded that "the height and footprint of

the proposed building are consistent with the pattern of development of the neighborhood." (HRER Part 2, p. 3, <u>Exhibit B</u>.)

With respect to floor area, the Project (8,066 square feet) falls in the middle of existing floor areas on this block, with some homes as big as 9,836 square feet. The home at the DR requester's property is comparable at 7,752 square feet, and the home at 190 Sea Cliff is larger at 8,440 square feet.

| Sea Cliff Ave. Address | Floor Area (sq. ft.) |
|------------------------|----------------------|
| 160 | 9,019 |
| 164 | 7,752 |
| 178 (proposed) | 8,066 |
| 190 | 8,440 |
| 200 | 4,596 |
| 224 | 6,902 |
| 230 | 7,071 |
| 250 | 8,516 |
| 270 | 6,165 |
| 290 | 8,057 |
| 300 | 9,836 |

The Project is consistent with its neighbors in height, as well. Most homes on the Project's side of Sea Cliff Ave. on this block are three stories, and the Project matches the two adjacent properties in height. (Exhibit D.)

The Project is consistent with neighboring homes as to side setbacks and rear yard. The Project has an eight-foot side yard on the east side, as permitted by Planning Code Section 133(c). (Exhibit E.) On the west side, adjacent to 190 Sea Cliff, the Project is built to the property line, but 190 Sea Cliff is set back 9'-6" from the property line. These are large side setbacks even by Sea Cliff standards.

The rear yard and depth of the Project's rear yard are consistent with the neighborhood pattern. The rear building wall is over 30' short of the required rear yard line, and comparable in depth to neighboring properties. (Exhibit E.)

The DR requester raises concerns with view impacts, but views from private residences are not protected. Notwithstanding this well-established rule, the Project was designed to minimize view impacts. Exhibit F shows that the Project will be scarcely visible from the DR requester's home at 164 Sea Cliff Avenue.

Views of the Project from 190 Sea Cliff Ave. are shown in <u>Exhibit G</u>. The impact is negligible. The Project will be visible from the home's entry foyer, but is not visible from the home's living room view windows.

C. The Planning Department Properly Issued a Categorical Exemption; the Project Does Not Cause a Substantial Adverse Change in the Significance of the California-Eligible Sea Cliff Historic District

The DR requester raises concerns about the Project's environmental review, but the Planning Department properly issued a Categorical Exemption for the Project, and the City's environmental review fully complies with CEQA. Planning Department Preservation Staff found that the demolition of the existing home and the construction of the new home would not have a significant effect on the overall integrity of the California Register-eligible Sea Cliff Historic District.

1. Applicable Law

Under CEQA, a "project with an effect that may cause a <u>substantial adverse change in the significance of an historic resource</u> is a project that may have a significant effect on the environment." (CEQA Guidelines Section 15064.5(b) [emphasis added].) In this case, the "historic resource" is the California Register-eligible Sea Cliff Historic District. The existing home at the Property was determined to be a potential contributor to the District, but not individually eligible for inclusion in the California Register. (HRER at p. 1.)

A substantial adverse change is defined as: "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired." (CEQA Guidelines Section 15064.5(b)(1).)

The significance of an historical resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance" and that justify or account for its inclusion in, or eligibility for inclusion in a local register of historical resources pursuant to local ordinance or resolution. (CEQA Guidelines Section 15064.5(b)(2).) Thus, a project may cause a substantial change in a historic resource, but still not have a significant adverse effect on the environment as defined by CEQA, as long as the impact of the change on the historic resource is determined to be less-than significant, negligible, neutral or even beneficial.

2. Analysis: The Project Does Not Cause a Substantial Adverse Change in the Significance of the California Register-Eligible Historic District

The Project does not, and cannot, cause a substantial adverse change in the District given the significant number of remaining contributing homes in the District, and number of homes overall. There are approximately 230 potential contributors in the District, and 300 homes overall.

Since 2006, there have been no demolitions of contributing buildings within the boundaries of the District.

The map below shows the large size of the District and the location of the Property in the District.



Preservation Staff concluded that the Project would not cause a substantial adverse change in the District in its Historic Resource Evaluation Response (HRER) Part II. (Exhibit B.) The HRER reasoned as follows:

Although the design of the project will not be compatible in massing, materials or details with nearby historic resources, the physical separation between new construction and such resources reduces the potential for direct impacts. Furthermore, although the proposed project may alter the setting of the California Register eligible Sea Cliff Historic District, the overall integrity of the district will not be affected by the project. Since identified as an eligible historic district in 2006, all but one project in the area has conformed with the Standards. Furthermore, since 2006, there have been no demolitions of contributing buildings within the boundaries

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of the eligible district. Of the active planning cases within the cumulative study area, there is one proposed project that is pending review. Even when taking into account the proposed demolition and new construction of the subject property, combined with the previously non-conforming project within the boundaries of the district, Planning Department preservation staff do not find that there would be a significant cumulative impact to the historic district.

(HRER Part II, pp. 3-4.)

By reflecting the architectural forms and features that were established in the neighborhood in the 1950s and 1960s, the Project's design will neither introduce new forms that would significantly detract from the integrity of setting, nor would it affect the district's integrity of feeling as an early twentieth century neighborhood.

One of the neighbor letters attached to the DR request expressed concern about cumulative impacts in the District given the new home at 255 Sea Cliff Avenue. However, the prior home at 255 Sea Cliff was not a contributor to the District. As such, the demolition of the original home and the addition of the new home had no net impact on the integrity of the District. One non-contributor replaced another non-contributor. Accordingly, for purposes of the subject Project, the new home at 255 Sea Cliff does not contribute to the cumulative impact of the Project on the District.

III. CONCLUSION

The proposed Project truly is an architectural masterwork. Given its location, such a design is only appropriate. Yet the design also is contextual, and continues the Sea Cliff tradition of single-family homes that are individually designed and convey high architectural merit. There are no exceptional or extraordinary circumstances present. As such, we ask that the Planning Commission approve the Project as proposed.

Very truly yours,

REUBEN, JUNIUS & ROSE, LLP

June a Beeler

James A. Reuben

Enclosures

cc: Kathrin Moore, Vice President

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Deland Chan
Sue Diamond
Frank S. Fung
Teresa Imperial
Milicent A. Johnson
Rich Hillis, Planning Director
David Winslow, Planner

List of Exhibits

Exhibit A Project Renderings

Exhibit B HRER Part 2

Exhibit C Context Survey

Exhibit D Front Elevation

Exhibit E Site Plan

Exhibit F Views from 164 Sea Cliff Ave.

Exhibit G Views from 190 Sea Cliff Ave.

EXHIBIT A



VIEW FROM WEST SOUTH



VIEW FROM EAST SOUTH



VIEW FROM WEST SOUTH (WITHOUT TREE)



VIEW FROM EAST SOUTH (WITHOUT TREE)



EXHIBIT B



Historic Resource Evaluation Response

 Date
 October 22, 2019

 Case No.:
 2017-013959ENV

Zoning: RH-1(D) (Residential – One Family, Detached)

178 Seacliff Avenue

40-X Height and Bulk District

Block/Lot: 1306/017

Date of Review: May 5, 2018 (Part I)

October 3, 2019 (Part II)

Staff Contact: Michelle Taylor, Preservation Planner

(415) 575-9197 | michelle.taylor@sfgov.org

MEA Planner Diane Livia, Environmental Planner

(415) 575-8754 | diane.livia@sfgov.org

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

Reception:

415.558.6378

+ax: **415.558.6409**

Planning Information: **415.558.6377**

PART II: PROJECT EVALUATION

Project Address:

Pre-existing Historic Rating/Survey

178 Seacliff Avenue is a single-family residence in the Sea Cliff neighborhood. The subject property was constructed in 1914 and designed by architect Edward G. Bolles in a vernacular mix of the Craftsman and Arts and Crafts architectural styles.

Based on the findings of the HRE Part 1 prepared by Page & Turnbull (dated October 2017), Planning Department staff determined that 178 Seacliff Avenue is eligible for inclusion on the California Register.¹ The subject building is a contributor to the California Register-eligible Sea Cliff Historic District which is significant under Criterion 1/A (Events) and Criterion 3/C (Architecture).² The subject property was determined not to be individually eligible for inclusion on the California Register.

The California Register-eligible Sea Cliff Historic District can be summarized as follows:

The Sea Cliff neighborhood is located at the northwest corner of San Francisco overlooking the Pacific Ocean and the Golden Gate Bridge. The Sea Cliff neighborhood is distinguished from the surrounding Outer Richmond neighborhood by its residential park planning, including the curvilinear street pattern and cohesive architectural character. The neighborhood is entered through columned entrances, and the houses are all similar in massing and style. Buildings and ornamentation were largely executed in French/Mediterranean, Spanish Revival, Edwardian, and hybrid Arts & Crafts/Tudor styles. Development of the neighborhood began after the 1906 Earthquake and Fire which pushed many city residents to the outer lands of San Francisco. The development of the former Baker Tract, which became the exclusive Seacliff residential park, was

¹ 178 Seacliff Avenue Historic Resource Evaluation Response Part 1, Case No. 2017-013959ENV, dated May 5, 2018.

² 26 25th Avenue Historic Resource Evaluation Response, Case No. 2005.0229E., dated May 1, 2007 and 330 Sea Cliff Avenue Historic Resource Evaluation Response, Case No. 2010.0967E., dated May 4, 2011.

undertaken by the John Brickell Company, builder and developer Harry B. Allen, and engineer William B. Hoag. The sale of lots in the new neighborhood began in 1913 with later subdivisions occurring in 1916, 1923, and 1928. Buyers of lots within Sea Cliff could either commission their own homes subject to approval by the developer or hire Allen & Company to build them one. Many of the homes were designed by prominent Bay Area architects such as Willis Polk, Bliss & Faville, Albert Farr, Charles Whittelsey, Edward G. Bolles, George W. Kelham, William W. Wurster, Hyman & Appleton, Earl Bertz, Frederic Nickerson, Bakewell & Weihe, Sylvain Schnaittacher, Matthew V. Politeo, Houghton Sawyer, George McCrea, Warren Charles Perry, and Will H Toepke. The eligible historic district has a period of significance of 1913 to 1935.

The character-defining features of the eligible district include:

- Bluff-top location in Sea Cliff neighborhood;
- Two- to three-story massing with side setbacks;
- Landscaped front setbacks;
- Mediterranean Revival style features including stucco cladding, gabled and hipped roofs with Spanish clay tiles, exterior chimneys;
- Rich Eclectic Revival detailing such as faux quoins, wood shutters, cartouches and balconettes;

☐ Alteration

• Multi-light wood-sash windows, often with arched openings.

⊠ Demolition

Although not formally surveyed, the boundaries of the eligible district are irregular but would likely be the Presidio of San Francisco, 28th Avenue, and 30th Avenue to the east; a line along El Camino Drive, Lake Street, and Sea View Terrace to the south; Lincoln Park and Lake Street to the west; and the Pacific Ocean to the north.

| · · · — |
|--|
| Per Drawings Dated:1/21/2019 |
| Project Description The proposal is to demolish an existing 4,479 square-foot, three-story over basement, single-family residence to allow for the construction of a new 8,066 square-foot, three-story over basement, single-family residence. |
| Project Evaluation If the property has been determined to be a historical resource in Part I, please check whether the proposed project would materially impair the resource and identify any modifications to the proposed project that may reduce or avoid impacts. |
| Subject Property/Historic Resource: The project will not cause a significant adverse impact to the historic resource as proposed. |
| The project <u>will</u> cause a significant adverse impact to the historic resource as proposed. |

Proposed Project

Historic Resource Evaluation Response October 11, 2019

CASE NO. 2017-013959ENV 178 Seacliff Avenue

| California Register-eligible Historic District or Context: |
|--|
| The project will not cause a significant adverse impact to a California Register-eligible histor |
| district or context as proposed. |
| The project <u>will</u> cause a significant adverse impact to a California Register-eligible historic distri- or context as proposed. |

Project Impacts

Planning staff has reviewed the proposed project at 178 Seacliff Avenue and determined the demolition of a contributing property within the historic district will not materially impact the California Register-eligible Sea Cliff historic district. Additionally, staff has determined that although the proposed new single-family residence is not compatible with the district, the proposed design will not materially impair the eligible historic district.

The project proposes to demolish the existing 1914 single-family home and construct a new three-story over basement detached single-family home in a modern style, using modern finishes and detailing. The new building will be comprised of a two-story boxed volume cantilevered above a recessed ground floor, allowing the building to appear as if it is floating. The modern style of the building is further emphasized through the use of a simple flat roof, stacked Indiana textured stone cladding offset by smooth stone fascia belt courses and coping. The geometric language of the building will be further expressed with large rectangular, floor to ceiling openings comprised of both clear anodized-aluminum frame windows and large recessed balconies with glass guardrails. A concrete drive at the side (east) elevation provides access to the entrance and a subterranean garage entry hatch.

Although the height and footprint of the proposed building are consistent with the pattern of development of the neighborhood, the overall design of the building is not compatible with the character of the eligible district. The new building will not incorporate design elements identified as character defining to the Sea Cliff historic district, such as stucco cladding, gabled and hipped roof with Spanish Clay tiles, exterior chimneys, and multi-light wood-sash windows. Instead, the proposed modern massing, expressed with a two-story box form above a recessed glass base, contrasts with the traditional massing and sloped roofs common to Revival styles. Additionally, the proposed textured cladding materials of the stacked stone and smooth stone fascia, will be at odds with the smooth stucco finish featuring ornamental detailing common to this neighborhood. Furthermore, the expansive fenestration and abundant use of glass on the proposed building is inconsistent with the pattern of wood-frame, multi-light windows. The modern pattern of openings is further contrasted with the introduction of recessed balconies and glass railings. As proposed, the new building introduces new materials and modern forms that are not compatible with the historic character of the eligible historic district.

Cumulative Impacts

The geographic scope, or cumulative study area, for cumulative historic architectural resource impacts includes the project site and eligible Sea Cliff historic district.

Staff finds that the demolition of 178 Seacliff Avenue and construction of the proposed project would not result in a cumulative impact to the California Register-eligible Sea Cliff Historic District. Although the design of the project will not be compatible in massing, materials or details with nearby historic resources,

Historic Resource Evaluation Response October 11, 2019

CASE NO. 2017-013959ENV 178 Seacliff Avenue

the physical separation between new construction and such resources reduces the potential for direct impacts. Furthermore, although the proposed project may alter the setting of the California Registereligible Sea Cliff Historic District, the overall integrity of the district will not be affected by the project.

Since identified as an eligible historic district in 2006, all but one project in the area has conformed with the Standards.³ Furthermore, since 2006, there have been no demolitions of contributing buildings within the boundaries of the eligible district. Of the active planning cases within the cumulative study area, there is one proposed project that is pending review.

Even when taking into account the proposed demolition and new construction of the subject property, combined with the previously non-conforming project within the boundaries of the district, Planning Department preservation staff do not find that there would be a significant cumulative impact to the historic district.

| PART | II: PRINCIPAL PRESERVATION PLANNER REVIEW | | |
|--------|---|-------|--|
| Signat | ture: | Date: | |
| | Allison Vanderslice, Principal Preservation Planner | | |
| cc: | Environmental Planner, Diane Livia | | |
| | Project Planner, Sylvia Jimenez | | |

SAN FRANCISCO
PLANNING DEPARTMENT

4

³ See 2840 Lake Street Historic Resource Evaluation Response and Categorical Exemption, Case No. 2015-013369ENV.

EXHIBIT C

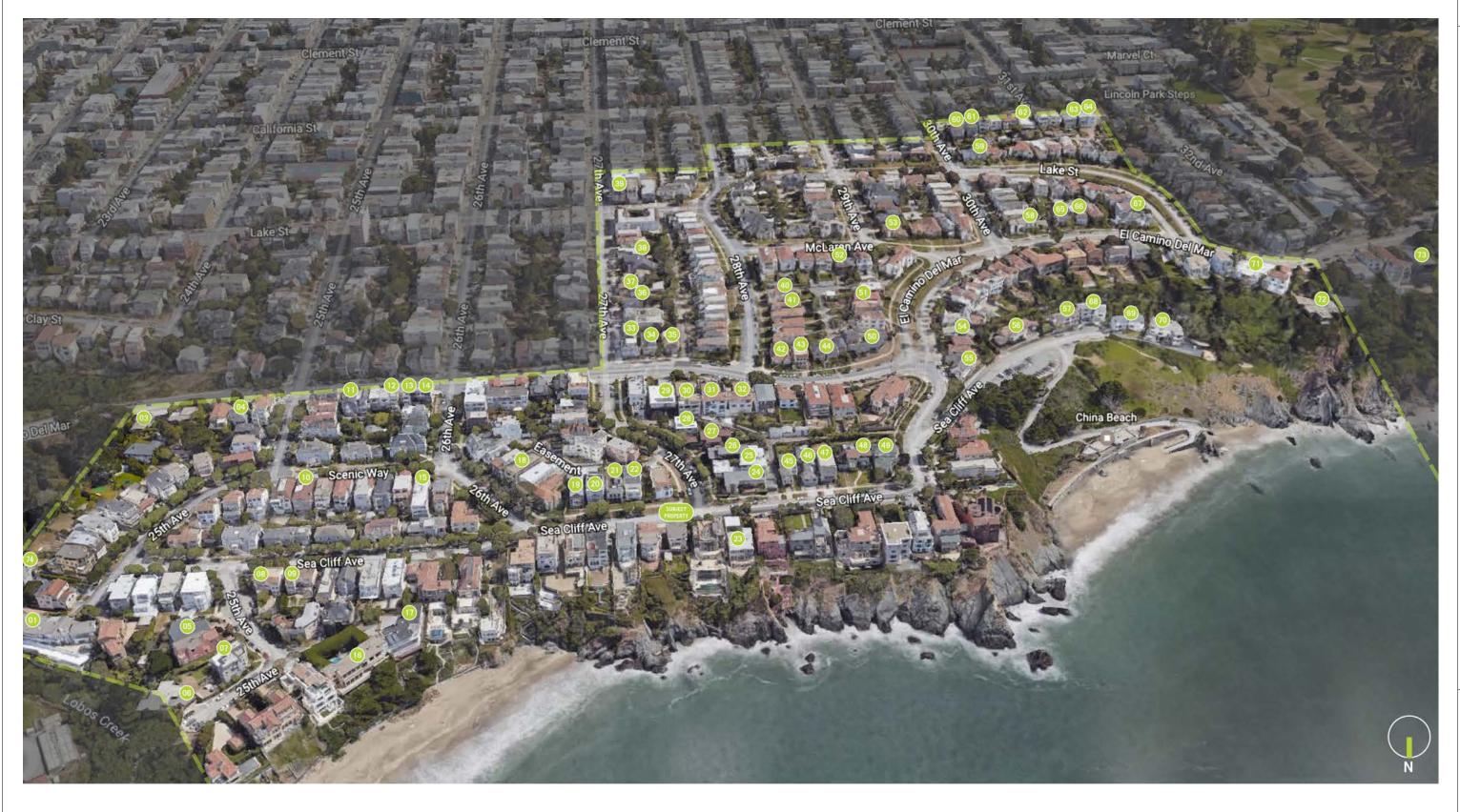
EXHIBIT

NEIGHBORHOOD CONTEXT MAP

178 SEACLIFF AVE.
SAN FRANCISCO, CA

BUTLER ARMSDEN ARCHITECTS

BUTLER ARMSDEN



AERIAL MAP

SURVEY OF SEACLIFF HOUSES BUILT AFTER THE PERIOD OF SIGNIFICANCE (1935)

BUTLER ARMSDEN ARCHITECTS







































HOUSES BUILT 1936-1961

BUTLER ARMSDEN ARCHITECTS

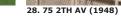














31. 440 EL CAMINO DEL MAR (1936)











35. 425 EL CAMINO DEL MAR (1951)

36. 135 27TH AV (1936)

37. 141 27TH AV (1948)











40. 135 28TH AV (1940)

41. 125 28TH AV (1940)

42. 501 EL CAMINO DEL MAR (1954)











48. 275 SEA CLIFF AV (1949)

49. 285 SEA CLIFF AV (1948)

HOUSES BUILT 1936-1961





53. 75 MCLAREN AV (1955)



54. 580 EL CAMINO DEL MAR (1949)



55. 550 EL CAMINO DEL MAR (1958)



56. 455 SEA CLIFF AV (1939)



58. 711 EL CAMINO DEL MAR (1970)



59. 2901 LAKE ST (1960)



60. 8 SEA VIEW TE (1937)





62. 40 SEA VIEW TE (1960)



63. 70 SEA VIEW TE (1940)



64. 76 SEA VIEW TE (1941)



65. 735 EL CAMINO DEL MAR (1946)



66. 745 EL CAMINO DEL MAR (1936)



67. 775 EL CAMINO DEL MAR (1955)



69. 494 SEA CLIFF AV (1938)



70. 496 SEA CLIFF AV (1938)



71. 800 EL CAMINO DEL MAR (1959)



HOUSES BUILT 1936-1961



11. 222 EL CAMINO DEL MAR (2001)
NEW CONSTRUCTION BY BUTLER ARMSDEN ARCHITECTS



14. 250 EL CAMINO DEL MAR (1978)





23. 200 SEA CLIFF AV (1963)



26. 35 27TH AV (1950/1960s)
76 SURVEY
DESIGNED BY WILLIAM WURSTER IN 1950, IN 1960s RENOVATED BY THEODORE BERNARDI AND EMMONS



29. 420 EL CAMINO DEL MAR (1958/2014) BY JOE ESHERICK (1958) REMODELED BY EDMONDS+LEE ARCHITECTS (2014)



33. 101 27TH AV (1940/2014)
REMODELED BY GABRIEL NG+ARCHITECTS INC. (2014)



45. 235 SEA CLIFF AV (1941/2017)
REMODELED BY BUTLER ARMSDEN ARCHITECTS (2017)



47. 255 SEA CLIFF AV (1951/2018)NEW CONSTRUCTION



50. 535 EL CAMINO DEL MAR (1951/2014)
REMODELED BY CONSORTHIM APCHITECTURE (2014)



57. 475 SEA CLIFF AV (1971)







73. 890 EL CAMINO DEL MAR (1963) ESHERICK HOMSEY DODGE & DAVIS



74. 24 25th AVE (1923/2007)

BUTLER ARMSDEN ARCHITECTS

EXHIBIT D



EXHIBIT E

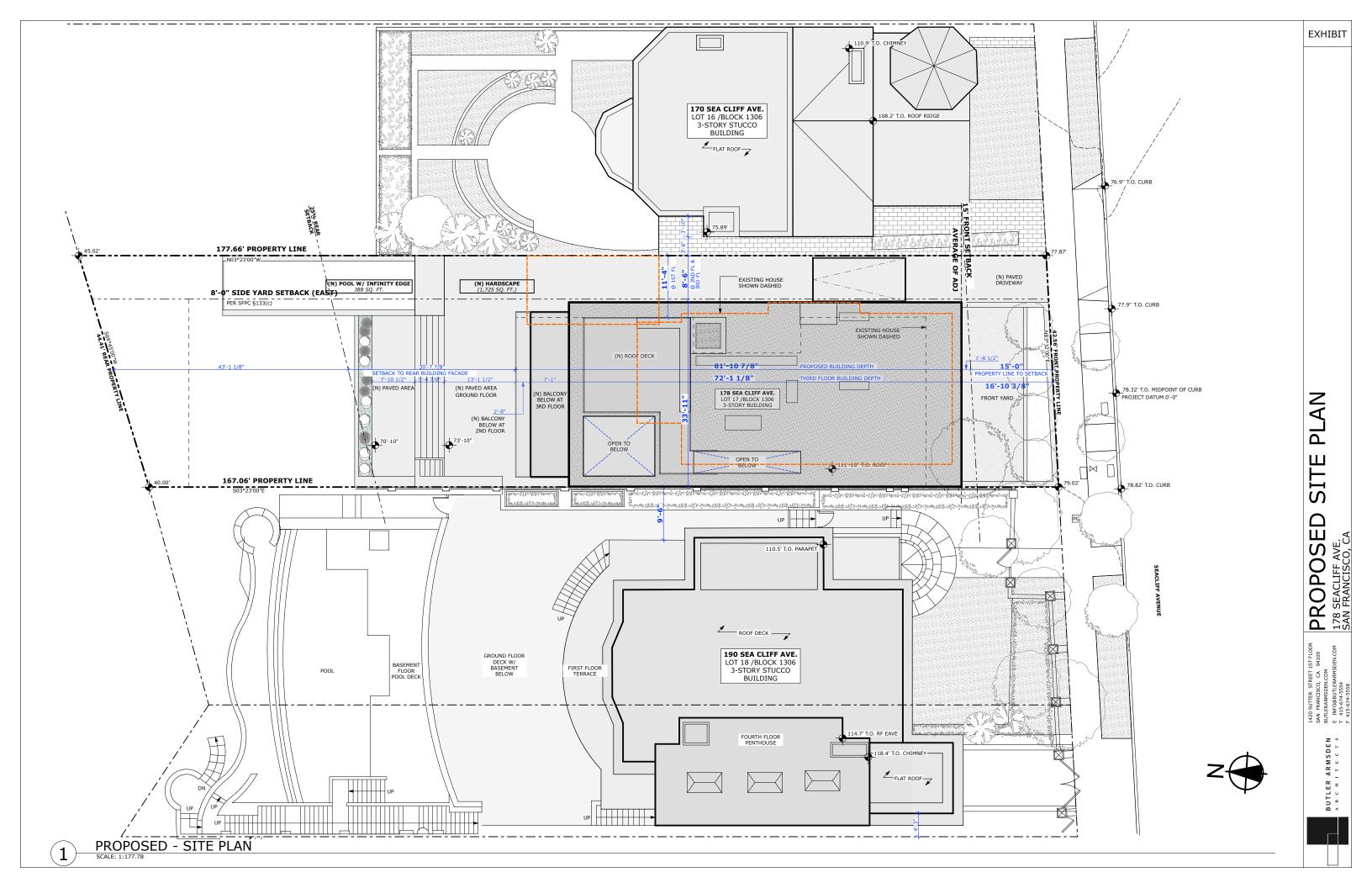


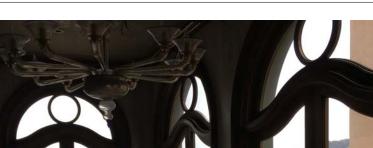
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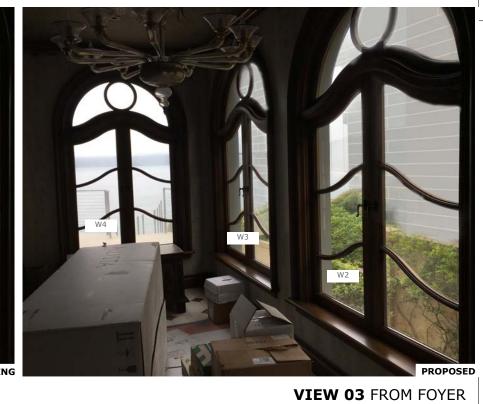
EXHIBIT G







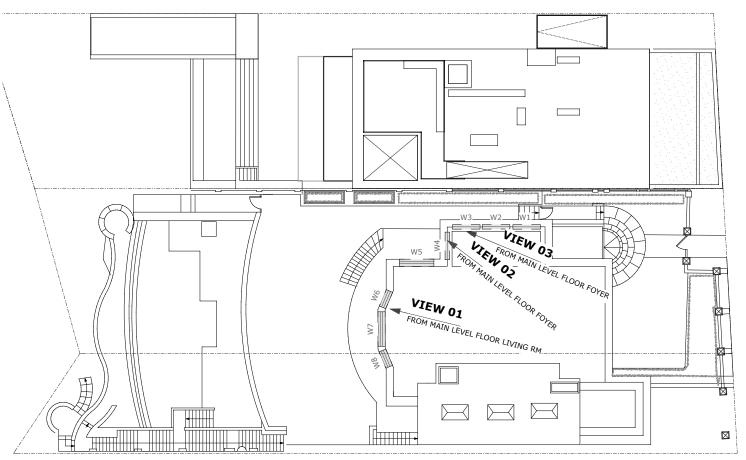


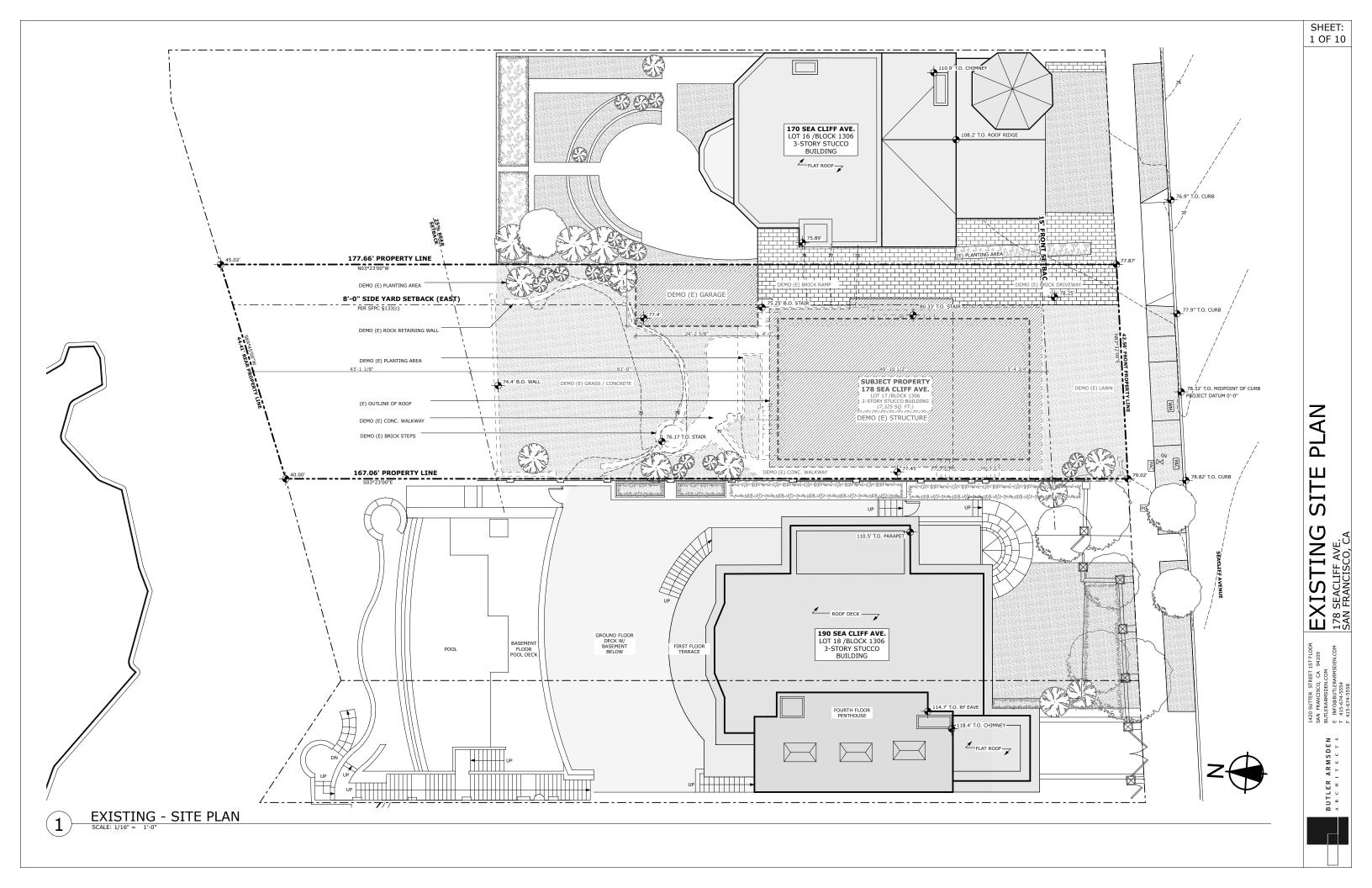


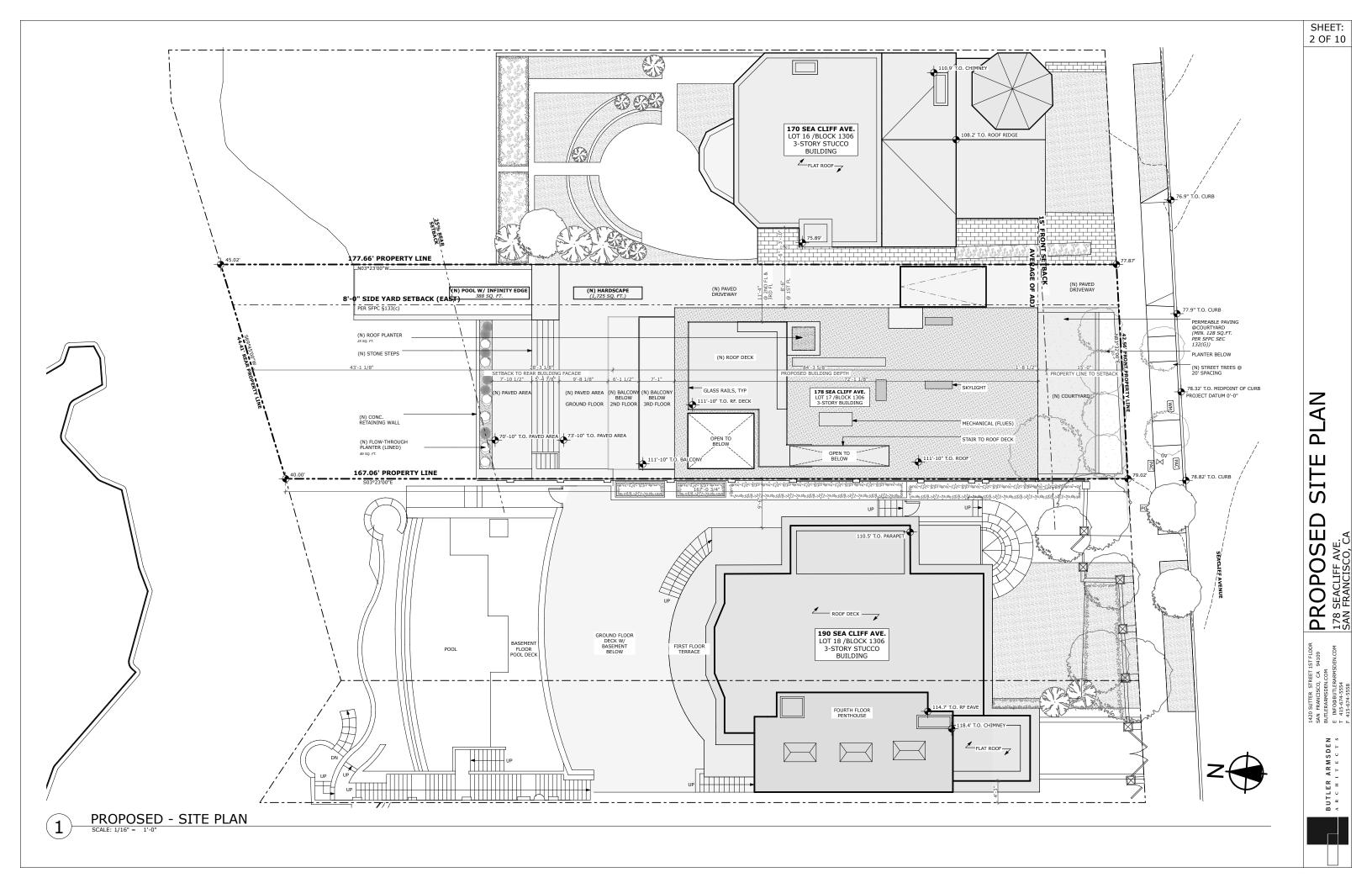
VIEW 02 FROM FOYER



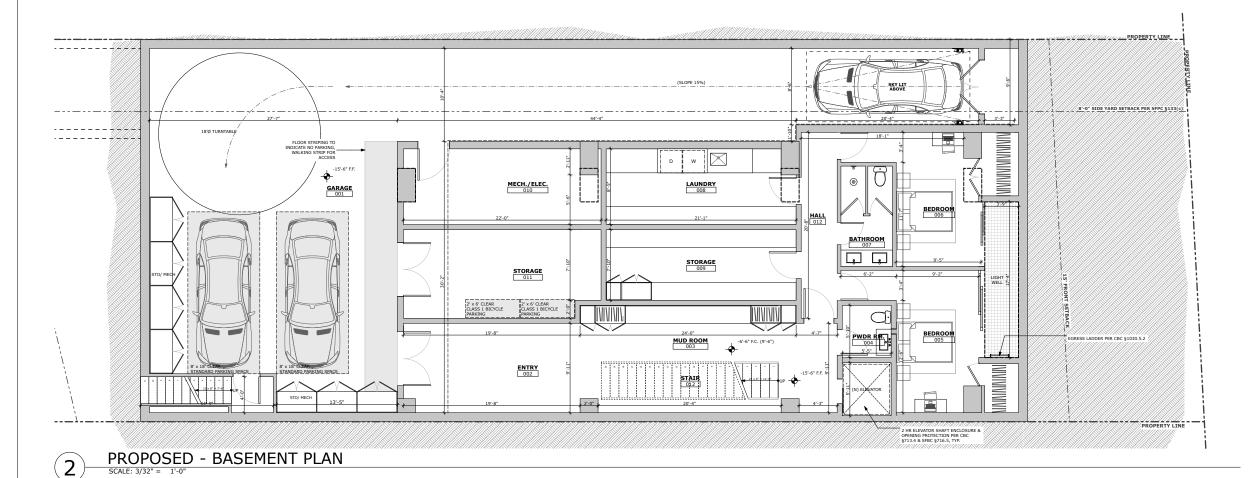


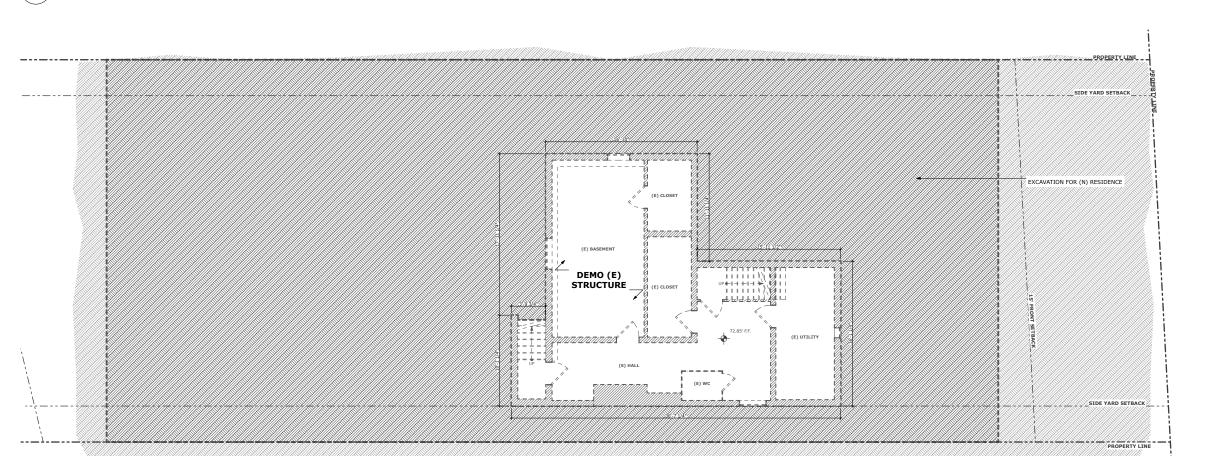


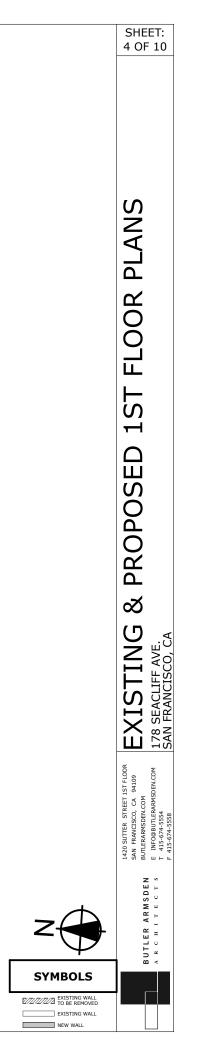


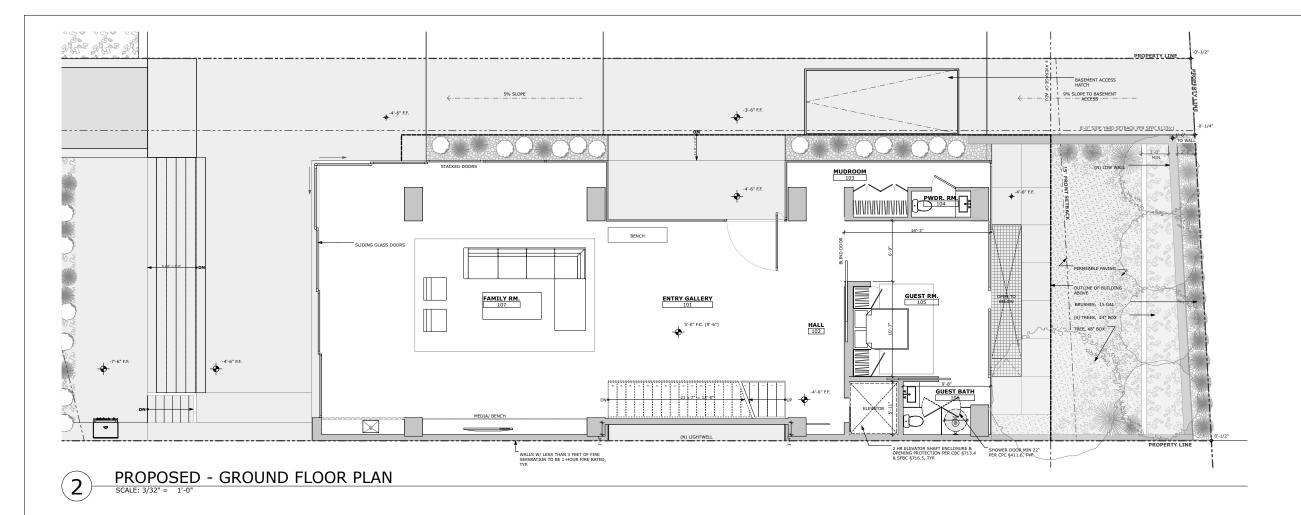


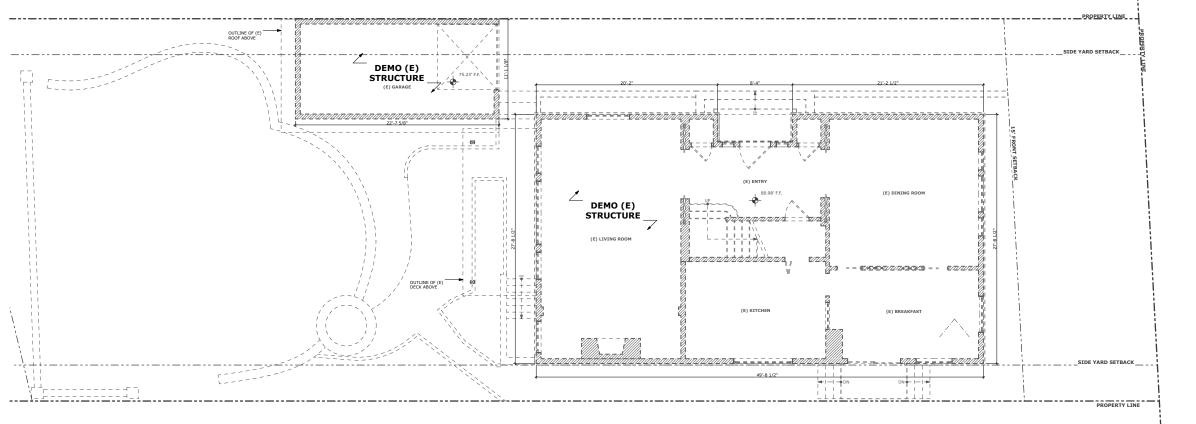
SYMBOLS EXISTING WALL TO BE REMOVED NEW WALL









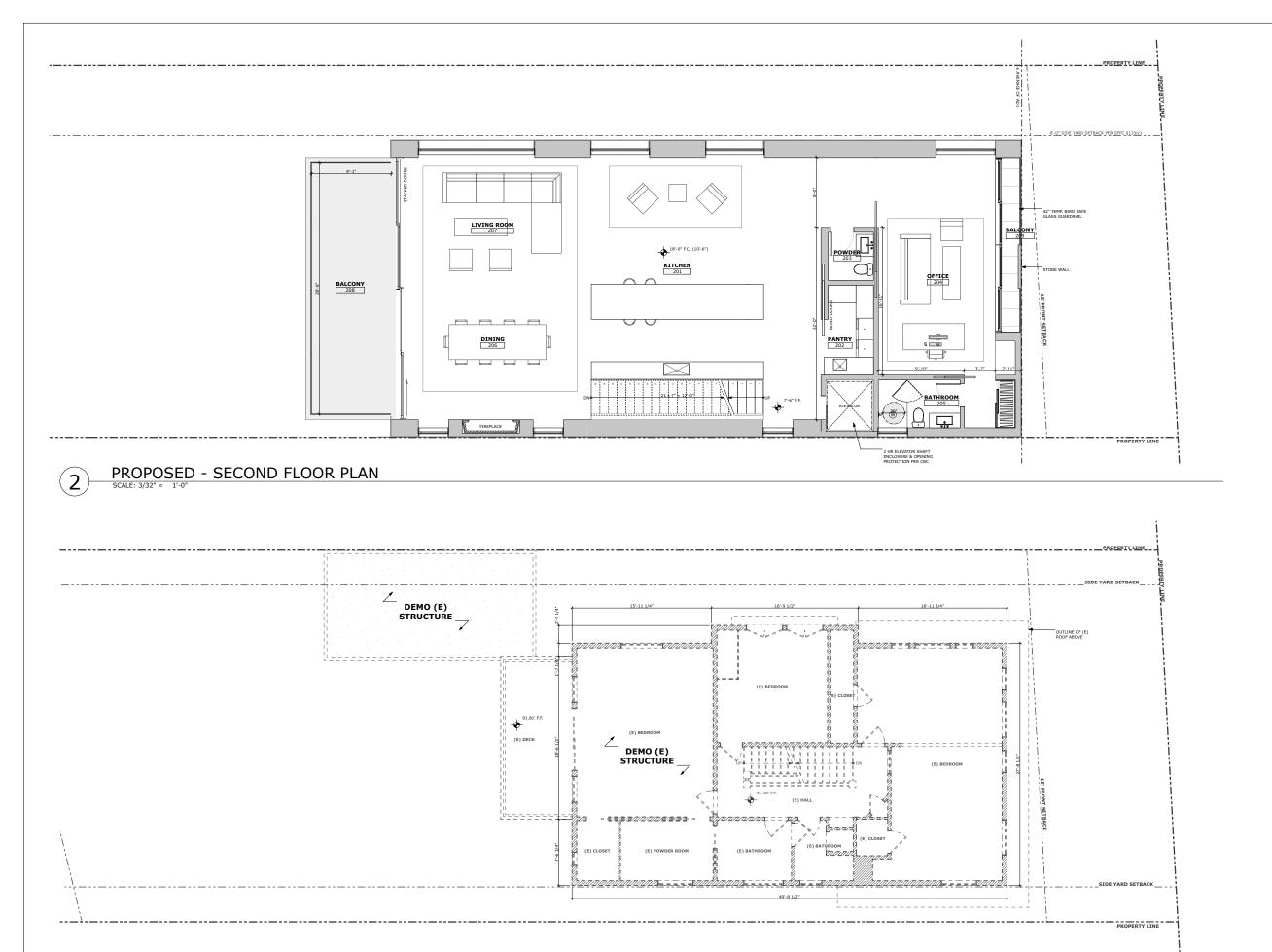


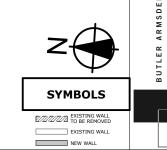
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EXISTING FIRST FLOOR PLAN
SCALE: 3/32" = 1'-0"



SHEET: 5 OF 10





1 EXISTING SECOND FLOOR PLAN
SCALE: 3/32" = 1'-0"



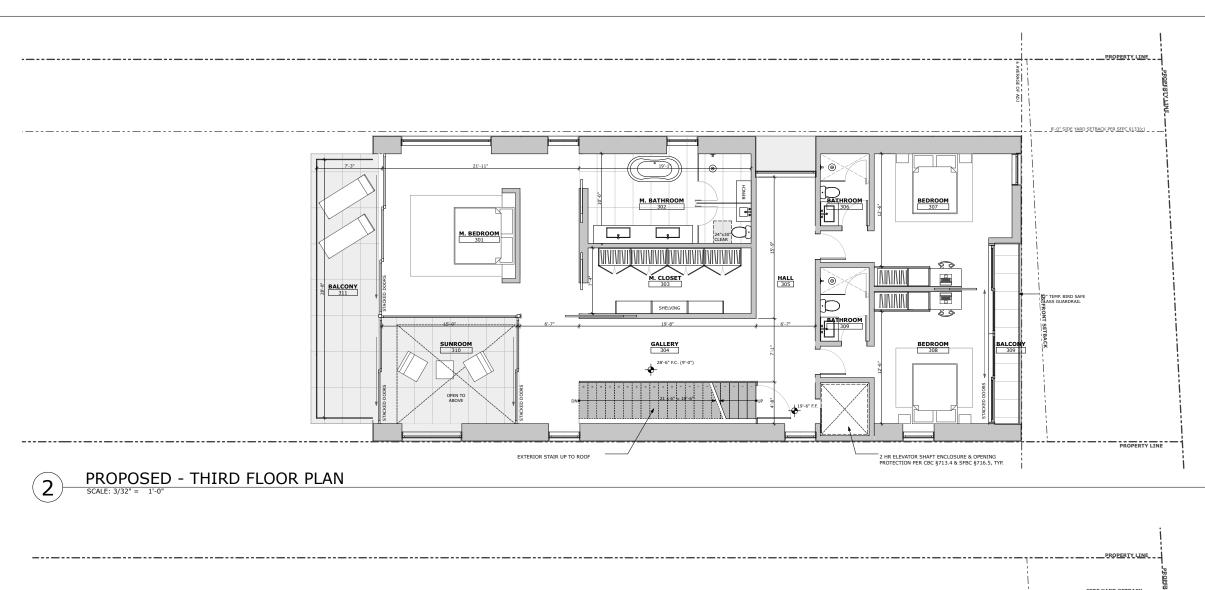
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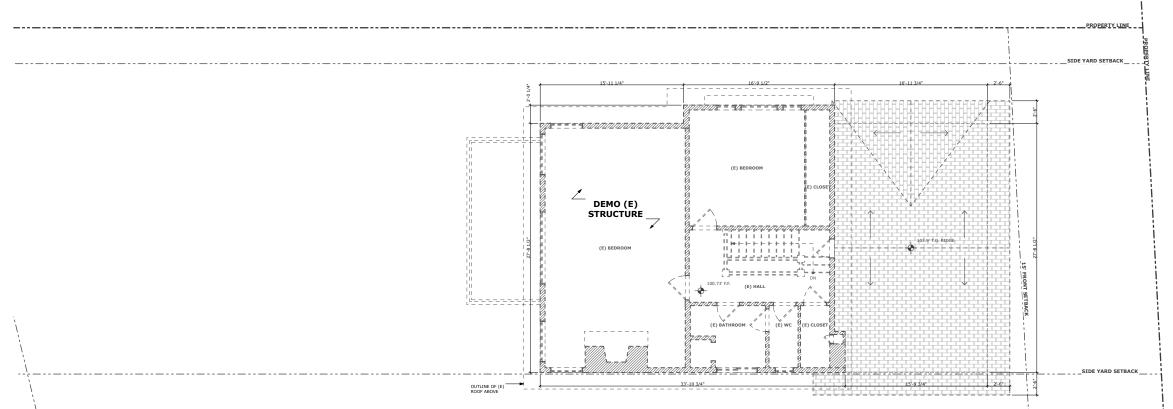




SYMBOLS

NEW WALL





EXISTING THIRD FLOOR PLAN
SCALE: 3/32" = 1'-0"

