





San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

March 16, 2022

Ms. Lisa Gibson
Environmental Review Officer
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Dear Ms. Gibson,

On March 16, 2021, the Historic Preservation Commission (HPC) held a public hearing for the Commissioners to hear public testimony and to provide comments to the San Francisco Planning Department on the Draft Environmental Impact Report (DEIR) for the proposed Lake Merced West project at 520 John Muir Drive on the site of the Pacific Rod and Gun Club (2019-014146ENV). After discussion, the HPC arrived at the comments below on the DEIR:

- The HPC found the analysis of historic resources in the DEIR to be accurate. Although the HPC understands the period of significance relates to the history and use of the site by the Pacific Rod and Gun Club, Commissioners wanted to acknowledge the site's prior use and significance to the wider community, for example the Ramaytush Ohlone. This is in line with the HPC's priority of reviewing issues through a racial and social equity lens.
- The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts.
- Some Commissioners expressed a preference for the Partial Preservation Alternative as it was closer to the proposed project. Commissioner Black expressed a preference for the Partial Preservation Alternative as it met more of the programmatic objectives of the proposed project. Commissioner So appreciated how the Partial Preservation Alternative accommodated elements of the proposed project through adaptive reuse of some of the contributing buildings on the site.
- Other Commissioners preferred the Full Preservation Alternative given the unique nature of the site. Commissioner Nageswaran expressed her preference for the Full Preservation Alternative as it retained more original features of the complex while Commissioner Wright acknowledged that the Full Preservation Alternative was the only alternative that reduced impacts to a less-than-significant level (aside from the no project alternative).
- Commissioner Wright was curious to know why the Shell House was not incorporated within the preservation alternatives and wondered if it would be possible to construct an addition to the rifle range building in one of the alternatives.

- The HPC expressed the importance of having the mitigation measures also tell the stories of the Ramaytush Ohlone as part of the larger social and cultural history of Lake Merced. Commission President Matsuda reinforced the larger cultural stories that could be told about this site as a significant cultural landscape were important and would be in line with the HPC's resolution centering racial and social equity.
- Commissioner Foley suggested the use of QR codes as a way to provide access to interpretive displays around the site.

HPC Comments on the Proposed Project

- Commissioners expressed their support for the proposed project that would open up the site to a much wider audience than its existing closed state and previous use as a shooting range.
- Commissioner Nageswaran expressed her concern about the timing of the phasing of the project and said it would be regretful if the site were to be demolished only to not find a concessionaire for the site.
- Commissioner Black expressed her support for the design direction of the proposed project.

General Comments

- Commission President Matsuda requested that commissioners go on site visits in instances where the site has been closed off to the public for an extended period of time.
- Commission President Matsuda suggested that a project objectives include acknowledging and interpreting the site's history and significance.

The HPC appreciates the opportunity to participate in review of this environmental document.

3/29 Email to Commission show how the Demo Calculations have been manipulated by developers because they have never been adjusted as the Commission empowered by Section 317 (b) (2) (D).

Egregious project avoided the rules twice through manipulating the existing numeric values in the Demo Calcs.

Example illustrates overall problem:

Loss of housing that could be considered “more financial accessible” as described in the Section 317 (a) Findings.

Page 163 of the packet for 4/7 hearing on Housing Element:

New policy eliminates CUA for Demolitions

Page 523 ability of Commission to adjust Calcs and reduce values, not mentioned as a way that housing could have been preserved.

Words “Demolition Calculations” are not even used.

Word “gymnastics” is used to describe how projects are designed in such a way to be “just under the numeric threshold”.

Section 317 never applied by Staff or Commission as intended to preserve housing.

