



Laurel Heights Improvement Association of San Francisco, Inc.

BY HAND

August 28, 2019

President Myrna Melgar and Commissioners
San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: 3333 California Street, San Francisco, CA
Record Number: 2015-014028CUA/PCA/MAP/DUA
Certification of Final EIR
Planning Commission Hearing: September 5, 2019

RECEIVED

AUG 28 2019

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

In connection with the developer's revised Planning Application Re-Submittal 2, dated July 3, 2019; Planning Application re-submittal 3, dated August 20, 2019, and draft Development Agreement released on August 1, 2019, which proposed inclusion of senior affordable housing in the project variant, Laurel Heights Improvement Association hereby clarifies, supplements and modifies its discussion of the Community alternatives previously submitted as comment on the Draft EIR, as stated herein.

Very truly yours,

Laurel Heights Improvement Association of SF, Inc.

Kathryn R. Devincenzi

By: Kathryn R. Devincenzi, President
Email: LaurelHeights2016@gmail.com

Attachments: Exhibits A-C and 1-5

COMMUNITY FULL PRESERVATION ALTERNATIVE

OVERVIEW

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

The Community Full Preservation Alternative would: (1) convert the interior of the main building to residential uses while retaining the existing 1,183 asf café, 11,500 gsf childcare center, and 5,000 gsf of the existing office space (at the developer's option, this existing office space could be converted to residential use), (2) construct three new residential buildings along California Street where parking lots are now located and also construct a new residential building near the intersection of Mayfair Drive and Laurel Street, (3) provide at least 56 flat-type units sized for families, with additional on-site affordable housing determined by the Board of Supervisors, (4) excavate for only a single, one-level underground parking garage and the foundation for the Mayfair Building, (5) propose that all freight loading and unloading be conducted in the underground freight loading areas accessed from Presidio Avenue and all

passenger loading and unloading be conducted inside the site in turnarounds or in the underground parking garage, (6) retain the historically significant landscaping designed by the renowned landscape architects of Eckbo, Royston & Williams which is integrated with the window-walled main building, including the Eckbo Terrace and existing landscaped green spaces along Laurel Street, Euclid Avenue and Presidio Avenue, which would be designated as community benefits in the development agreement, (7) preserve the majority of the 195 mature trees on the site which are comprised of 48 different tree species (Initial Study p. 16), and (8) maintain public vistas of the downtown and the Golden Gate Bridge and the historically significant main building and integrated landscaping. The Community Full Preservation Variant Alternative would add 110 more units to the Walnut Building, which could be used for senior housing, and additional units within the other buildings which could result in smaller unit sizes, as described herein. The Community Full Preservation Alternative and Variant would use all the new construction for residential use and would not rezone the site for approximately 54,117 gsf of retail uses or a 49,999 gsf new office building, as the developer proposes.

THE COMMUNITY FULL PRESERVATION ALTERNATIVE WOULD PROVIDE THE SAME AMOUNT OF NEW HOUSING UNITS IN APPROXIMATELY THREE YEARS WITHOUT DESTROYING A HISTORICALLY SIGNIFICANT RESOURCE.

The Community Full Preservation Alternative (Alternative) would preserve virtually all of the character-defining features of the main building and integrated landscaping, which are listed in the California Register of Historical Resources pursuant to Section 4851(a)(2) of the California Code of Regulations. (Ex. A, confirmation of listing) The window-walled main building would be converted to primarily residential use. This Alternative would have the same

number of residential units as the developer's proposed project (558 units) and would be constructed in approximately three years because the existing main building would be converted to residential use at the same time as the new residential buildings are constructed, to the extent staging permits. (See Exhibit B, layout of buildings) The Alternative would entail far less excavation, as it would have only one new underground parking garage along California Street and a total of approximately 460 on-site parking spaces. In contrast, the developer proposes to construct four new underground parking garages, including up to three levels of parking, to provide a total of approximately 763 parking spaces for the developer's proposed project (approximately 857 parking spaces for the developer's proposed variant).

The Community Alternative would retain the existing Eckbo Terrace and green landscaped areas along Laurel Street, Euclid Avenue and Presidio Avenue, except for a small portion to be occupied by the Mayfair Building. The existing Terrace would be designated as Privately-Owned, Publicly-Accessible Open Space in recorded deed restrictions and would be open to the public. The existing passageway that runs through the first floor of the existing main building and opens onto the Terrace and thence onto Masonic Avenue would be retained and opened to the public and marked with signage identifying it as a public thoroughway.

The character-defining features of the existing main building that the Community Alternative would retain include all of the following:

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

- Horizontal massing.

- Horizontal lines of projecting edges of concrete floors.

Horizontal bands of nearly identical window units.

Uninterrupted glass walls.

Window units of aluminum and glass.

Brick accents and trim.

Wrought iron deck railings that match gates in the landscape.

The character-defining features of the existing landscape that the Community Alternative would retain include all of the following:

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

The Concrete Pergola atop terraced planted beds facing Laurel Street, which creates a welcoming, shaded transition area where the inside and outside merged. (Draft EIR pp. 4.B.12 and 21)

In the Entrance Court, providing a connection between the Executive/Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria wing, key character-defining features include narrow planting beds adjacent to sidewalks; exposed aggregate sidewalks, and a low free-standing brick wall along its north side.

In the two outdoor sitting areas on the east and west sides of the area now used as an auditorium, key character-defining features for the area on the west side include the pavement (exposed aggregate divided into panels by rows of bricks), circular tree bed constructed of modular sections of concrete, and metal benches; key character-defining features for the area on the east side include the pavement (concrete divided into panels by wood inserted into expansion joints).

The Brick Wall (constructed of red brick set in running bond pattern similar in appearance to the brick used in the exterior of the main building) that takes several forms and which forms a continuous and unifying element around the edges of the site, would be retained except for the areas of the wall that surround the Service Building and which run along California Street. The brick from these areas will be retained, if feasible, and reused as trim on the bottom portions of the new California Street Back Buildings.

The Community Alternative would retain the three gated entrances - the entrance on California Street at Walnut Street, the service entrance at Mayfair and Laurel Street, and the executive/visitor entrance on Laurel Street. In this Alternative, much of the internal circulation system will be retained (entrance drive, service drive and executive/visitor entrance). All passenger loading, pick-ups and drop-offs will be proposed to be internal to the site, and turnarounds will be provided in front of the main building to the east of the entrance on California/Walnut and in front of the executive/visitor entrance on Laurel Street. (See Ex. C, circulation and loading plan) All freight loading and unloading is proposed to be conducted in the new underground garage accessed from Presidio Avenue.

Vegetation features that help to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods that will be retained include (1) the large Cypress trees in the existing west parking lot area, (2) the lawns on the west, south and east sides of the property, and (3) the planted banks along Laurel and Masonic streets.

The service building and circular garage ramps would not be retained.

In the Community Full Preservation Alternative, the existing 1,183 asf café and 11,500 gsf childcare center would remain in their present locations in the main building. At the developer's option, the existing 12,500 gsf of storage in the main building could be converted to parking spaces or used for other functions. Approximately 5,000 square feet of the existing nonconforming office space in the main building would remain, which the developer could continue to use for offices. At the developer's option, this existing office space could be converted to residential use.

In the Community Alternative, new residential buildings would be constructed along California Street where parking lots are currently located, and a Mayfair building would also be constructed at the same approximate location as the Mayfair building proposed by the developer. The new California Front buildings would be designed for families, and their average size would be 1,821 square feet. They would be designed to be compatible with both the main building and the existing buildings along the north side of California Street and would maintain the rhythm and scale of the townhouses across California Street. Each California Front flat would be 40 feet tall, approximately 28.5 feet wide and 100 feet in length with 25% of that length consisting of a private rear yard. Approximately 14 new flats containing 56 units for families would be built in

California Front between Laurel Street and Walnut Street. Two adjacent buildings would share one elevator, one mechanical shaft, and one common stairway.

The new California Street Back building would face inward toward the existing main building and be constructed with window walls designed to be compatible with the character-defining features of the windows in the existing main building. These flats would be sculpted to be a minimum of 42 feet from the large Monterey Cypress trees that remain from the Laurel Hill Cemetery, using the dimensions found on sheet A3.01 (Developer's 8-17-2017 plan set). The lengths of the flats would vary from approximately 72 to 35 feet, and each flat would be approximately 28.5 feet wide. They would have 52 units, with the average unit size ranging from 1,575 to 971 square feet depending on location, and the flat building would be 40 feet tall and be constructed between Laurel Street and Walnut Street. They would not have private rear yards. For each residential unit in the California Street Front and Back Buildings, one parking space with direct access would be provided in a new underground garage constructed under these buildings. Two adjacent flats would share one elevator, one mechanical shaft, and one common stairway.

In the Community Alternative, approximately 292 residential units would be provided in the existing main building, averaging 840 square feet in size. The developer can configure the size of the units and/or eliminate the office use. Internal Light Courts similar to those described on Developer's July 3, 2019 plan sheets A6.07 through A6.11 (previously August 17, 2017 plan sheets A6.15 and A6.16) will be located where feasible. For these units, parking with direct access would be provided in the existing underground garage in the main building.

A new 40-foot tall Walnut Building would be built along California Street between Walnut Street and Presidio Avenue. This building would contain approximately 118 residential units with an average square footage of 809 square feet. The developer can configure the size of the units. For these units, parking with direct access would be provided in a new underground garage to be built under this building.

In the Community Alternative, a new 40-foot tall Mayfair Building would be constructed approximately east of Mayfair Drive at Laurel Street. The Mayfair Building would have 40 residential units with an average size of 1,012 square feet. The Mayfair Building would not contain an underground parking garage. For these units, parking would be provided in the new underground garage constructed under the California Street Front and Back Buildings. The Mayfair Building would be constructed of window walls designed to be compatible with the character-defining features of the windows in the existing main building. A small portion of a grassy area of the existing landscaping would be occupied by this building.

Other than removing the circular garage ramps, the Community Full Preservation Alternative would not propose any of the exterior or interior circulation or site access changes proposed by the developer in August 17, 2017 plan sheets C.202 or L1.01 or in the “PRELIMINARY DESIGN” dated 08/2018. Under the Community Alternative, all Truck Loading or Unloading is proposed to occur in the new underground garage accessed on Presidio Avenue, and trucks and automobiles will have ingress and egress to these areas for loading, unloading, pick-ups, drop-offs and parking. Passenger vehicles and automobiles will also have ingress and egress to the site through the Walnut Gate at Walnut and California Streets and through the Mayfair Gate at Mayfair and Laurel streets. Passenger vehicles and automobiles will

also have access to a turnaround for passenger loading and unloading through the Laurel Street gate and through the Walnut gate.

In the Community Full Preservation Alternative Variant (Variant), there would be approximately 228 residential units with an average of 732 square feet in a 7-floor Walnut Building, which would require a height limit change for this area of the property only. Under the Community Variant, there would be 64 new residential units in the California Street Front Building with an average of 1,594 square feet, and 60 new residential units in the California Street Back Building with an average of 1,332, 1,275 or 850 square feet; these flats would be 25 feet wide under this Variant, and lengths would vary with location. Under the Community Variant, there would be 52 new residential units in the Mayfair Building, with an average of 780 square feet. All new buildings would be 40 feet tall except the Walnut Building. The developer could configure the size of the residential units. In addition to the existing café, childcare center and 5,000 gsf of office space, in the Community Variant, the main building would be converted to approximately 340 residential units, with an average of 722 square feet.

The Community Alternative/Variant would comply with all applicable laws and regulations, including by making any modifications in the design needed to achieve such compliance or to provide additional space for necessary functions.

In the Community Full Preservation Alternative, the glass curtain wall of the existing main building would be retained and repaired if feasible for residential use, or replaced with a window system that would be designed to be compatible with the character of the historic resource. DEIR pp. 6.66 and 6.77. In the Community Alternative, any replacements of the glass

curtain wall would be compatible with the geometric pattern of the windows in the existing main building.

The Community Full Preservation Alternative Variant would have the same characteristics as the Community Alternative, unless otherwise indicated above.

Please see Exhibit 1 for parking narrative; Exhibit 2 for SF Historic Preservation Commission letter dated December 11, 2018; Exhibit 3 for Denise Bradley Memo re Location of Trees that were part of Laurel Hill Cemetery; Exhibit 4 for narrative, calculations and schematics regarding Community Full Preservation Alternative and Variant; Exhibit 5 for TreanorHL Secretary of the Interior's Standards Compliancy Evaluation.

EXHIBIT A

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov



August 31, 2018

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

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

Dear Mr. Rothman and Ms. Devincenzi:

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Julianne Polanco'.

Julianne Polanco
State Historic Preservation Officer

Enclosure

August 31, 2018

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

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

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

Prefix Codes:

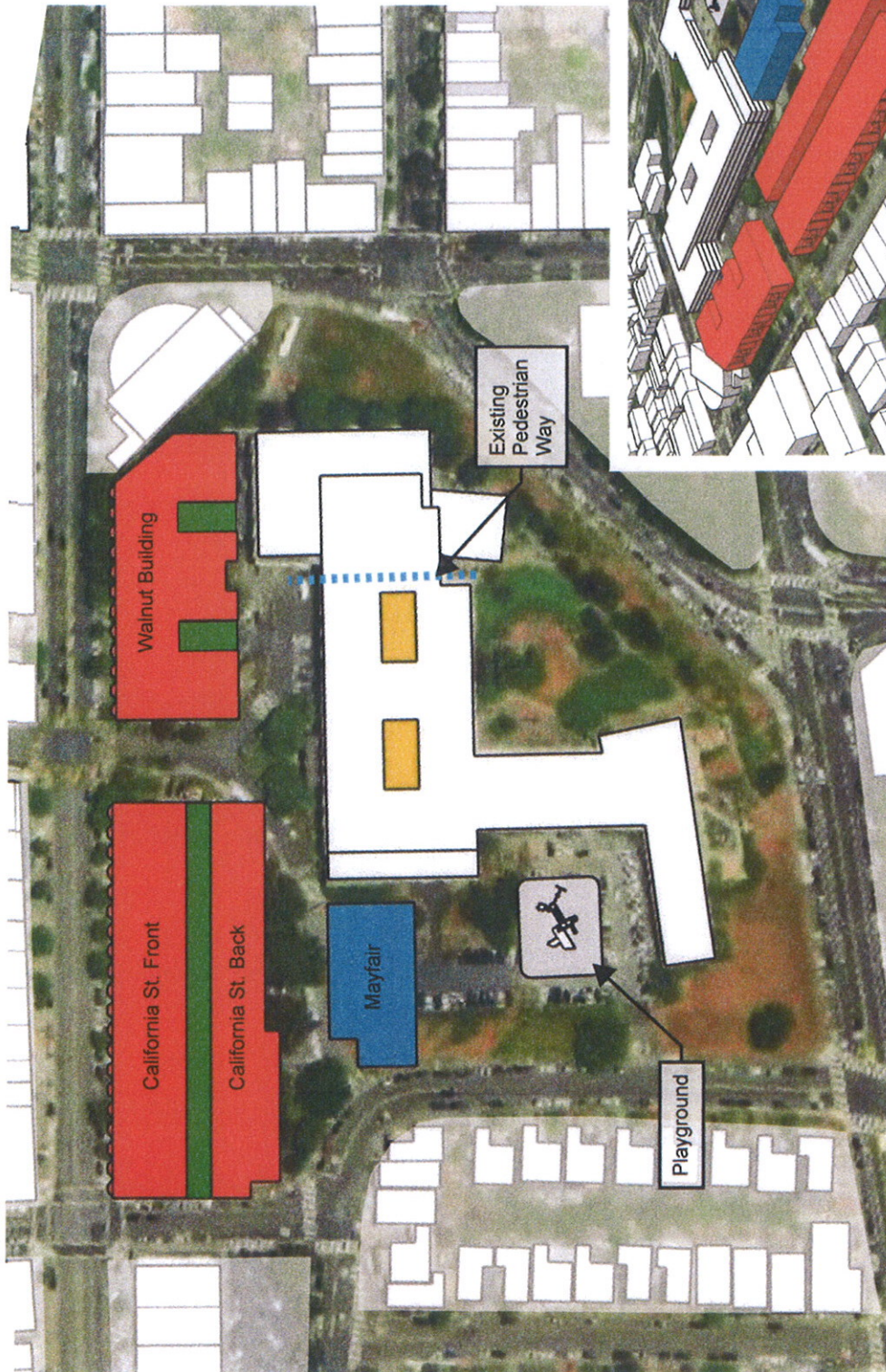
- SG - Single nomination
- MC - Multiple cover sheet
- MP - Multiple nomination (a nomination under a multiple cover sheet)
- FP - Federal DOE Project
- FD - Federal DOE property under the Federal DOE project
- NL - NHL
- BC - Boundary change (increase, decrease, or both)
- MV - Move request
- AD - Additional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

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

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

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

EXHIBIT B

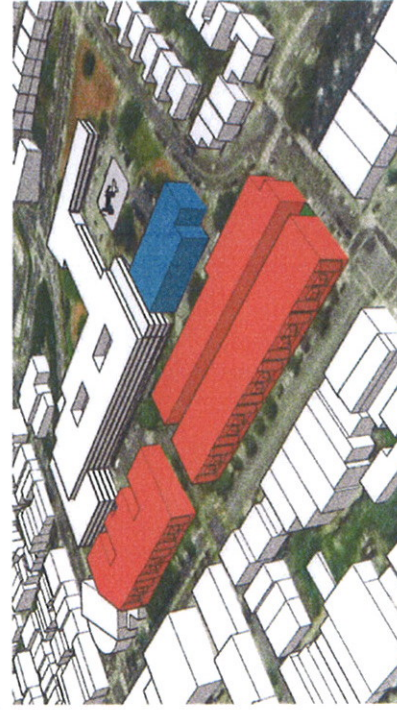


- Existing Building
- Existing Pedestrian Way

- New Light Court

Site Plan
NTS

TREANORHL



Aerial View Looking SE
NTS

EXHIBIT C

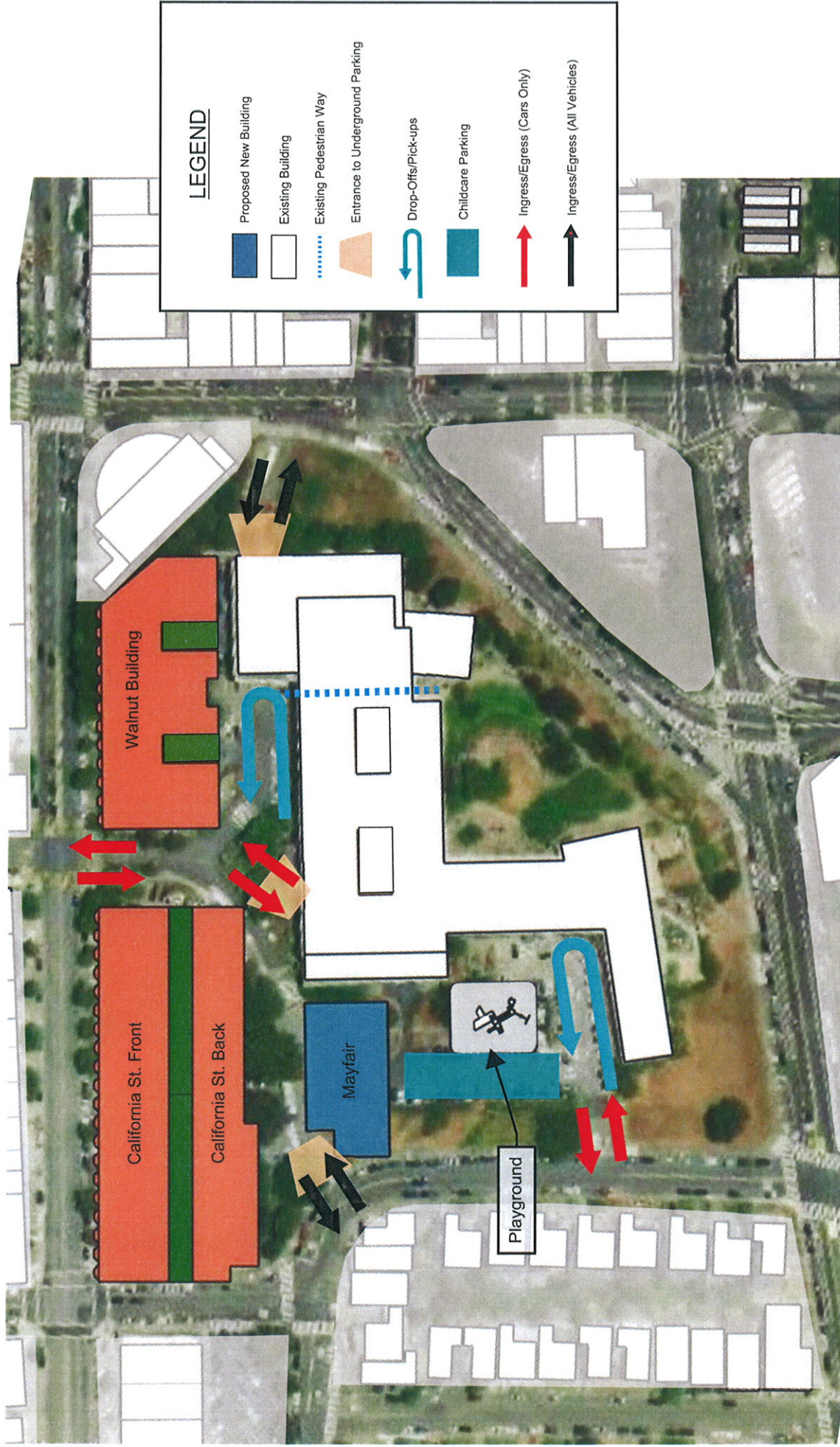


EXHIBIT 1

DEIR COMMUNITY FULL PRESERVATION ALTERNATIVE PARKING

Find attached the drawings of the layout, with dimensions, of the new California St. underground garage. In addition, a Summary Table is also attached.

There is 93,000gsf of parking under the main building, shown in pink, which provides 212 parking spaces as well as spaces for truck loading/unloading. This will be directly connected to the new parking garage. Cars will be able to enter and leave the garage complex via Presidio, California (at Walnut) and Laurel.

This portion of the garage is connected internally to the main building via elevators and stairways.

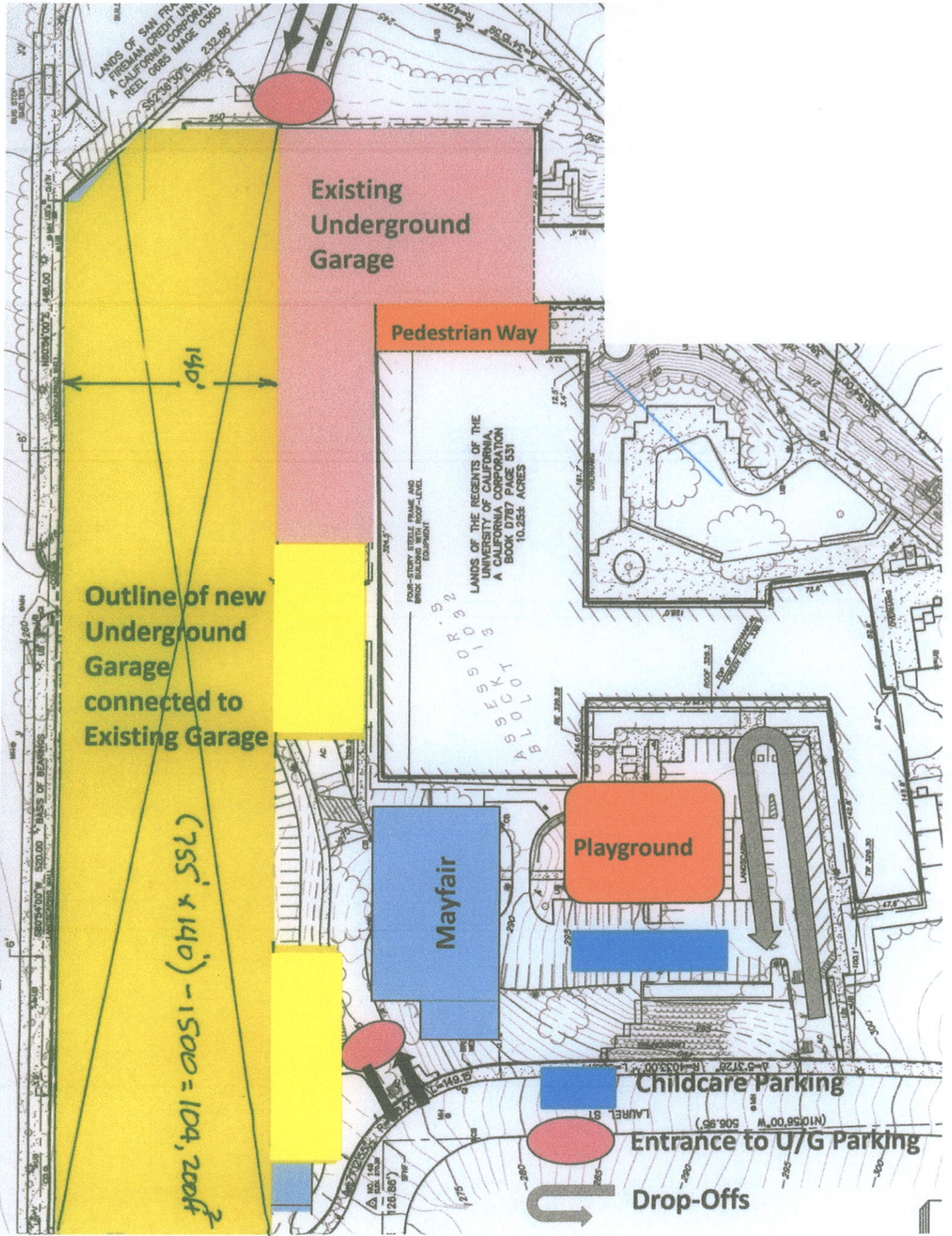
The new one level underground garage will consist of approximately 107,000 gsf of parking providing 248 spaces for cars, 4 freight loading docks and 600 bicycle spaces.

Total parking gsf is approximately 200,000 gsf for a total of 460 car parking spaces.

The Walnut Building as well as the California Building, Front and Back will have elevator and stairway access to the new parking garage. There will be additional entryways to/from the garage for residents of the Mayfair Building.

PARKING GARAGE SUMMARY

	A	B	C	D
1				
2				
3				
4		GROSS SQUARE FEET	SPACES	
5	DEVELOPER (VAR.01a)			
6	TOTAL	428,773	896	includes 693 bicycles and 6 freight loading spaces.
7				
8				
9	COMMUNITY ALTERNATIVES			
10	UCSF Existing	93,000		
11	New Level 1	106,500		
12	TOTAL	199,500	460	includes 600 bicycles and 4 freight loading spaces.



Outline of new Underground Garage connected to Existing Garage

Existing Underground Garage

Pedestrian Way

Mayfair

Playground

Childcare Parking

Entrance to U/G Parking

Drop-Offs

(755' x 140') - 1500 = 104,200 ft²

EXHIBIT 2



SAN FRANCISCO PLANNING DEPARTMENT

December 11, 2018

Ms. Lisa Gibson
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Dear Ms. Gibson,

On December 5, 2018, the Historic Preservation Commission (HPC) held a public hearing in order for the commissioners to provide comments to the San Francisco Planning Department on the Draft Environmental Impact Report (DEIR) for the proposed 3333 California Street Project (2015-014028ENV). As noted at the hearing, public comment provided at the December 6, 2018 hearing, will not be responded to in the Responses to Comments document. After discussion, the HPC arrived at the comments below:

- The HPC found the analysis of historic resources in DEIR to be adequate and accurate. The HPC concurs with the finding that the proposed project would result in a significant, unavoidable impact to the identified historic resource.
- The HPC expressed the importance of the historic resource as an integrated landscape and building.
- The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts.
- The HPC expressed interest in understanding more about a "neighborhood alternative" that was discussed by the public during public comment at the hearing.
- The HPC also supported combining some elements of the different alternatives in order to increase the amount of housing in the Full Preservation Alternative C. Commissioner Hyland specifically requested that Alternative C incorporate some elements from alternatives B and D such as increased building heights along California Street (up to 65 feet), the conversion of some areas of office or retail to residential use, and the incorporation of duplexes along Laurel Street.

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

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

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Wolfram", with a long horizontal flourish extending to the right.

Andrew Wolfram, President
Historic Preservation Commission

EXHIBIT 3

Memo

Denise Bradley Cultural Landscapes

520 Frederick Street No. 37
San Francisco, CA 94117
415. 751. 2604 (phone)
sfodab@hotmail.com (email)
www.denisebradley.us

Date: 24 April 2018

To: Kathy Devincenzi, Vice President
Laurel Heights Improvement Association of San Francisco, Inc.

cc: Michael Corbett

Subject: 3333 California Street Property
Location of Trees that were part of the Laurel Hill Cemetery

This memo provides a summary of the reference materials, reviewed as part of the Fireman's Fund National Register Nomination, that provide information on the location of trees at the 3333 California Street property that appear to have been part of the Laurel Hill Cemetery landscape.

In his book *Urban Landscape Design*, Garrett Eckbo described the design process for the mid-1950s landscape design for the Fireman's Fund site, which had been prepared by Eckbo, Royston, and Williams (ERW). In this description, he noted how some of the trees from the former cemetery were saved and incorporated into the Fireman's Fund landscape design.

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

The most impressive of the trees saved are the beautiful specimens of Monterey cypress in the parking areas on the California Street side of the building. Here, too, three very large blue gums are retained. In some ways, the most distinctive specimens saved are the large red-flowering eucalyptus near the corner of California street and Presidio, and the magnificent native toyon or Christmas berry in the parking area above Presidio. In addition to these six live oaks and a very large redwood and Monterey pine are saved. (Eckbo 1964:47).

The locations of the cemetery trees that were saved and incorporated into the Fireman's Fund landscape can best be understood through a review of historical aerial photographs that are attached to this memo.

Figure 1 shows the extent of the vegetation at the former Laurel Hill Cemetery in 1948 before any grading or construction work associated with the Fireman's Fund Home Office had occurred.

Figure 2 shows the 3333 California Street property in 1955 after grading for the Fireman's Fund Home Office had begun. The site has been cleared of all traces of the former cemetery except for select trees; these trees are circled on Figure 2.

Figure 3 shows the 3333 California Street property in 1958 after the completion of the initial phase of construction on the Fireman's Fund Home Office. Former cemetery trees that have been incorporated into the design, as described by Eckbo, are circled on Figure 3.

Figure 4 shows the 3333 California Street property in 1969, after the addition of the parking garage, auditorium, and office wing extension, which occurred between 1965 and 1967. This construction required the removal of some of the cemetery trees, and the ones that remained in 1969 are circled on Figure 4.

Figure 5 shows the current configuration of the 3333 California Street property. The trees which appear to have been part of the Laurel Hill cemetery vegetation are circled on Figure 5; these include:

- two Monterey cypress trees (#24 and #25 on the SBCA Tree Location Map)¹ on a low mound in the East Parking Lot,
- a blue gum eucalyptus (#118 on the SBCA Tree Location Map)² in the West Parking Lot, and
- several Monterey cypress (#119, #120, and #121 on the SBCA Tree Location Map)³ in the West Parking Lot.

¹SBCA Tree Consulting, Memo to Lisa Congdon (Prado Group Inc.), 3333 California Street, Protected Tree Survey, amended 24 March 2017.

²Ibid.

³Ibid.

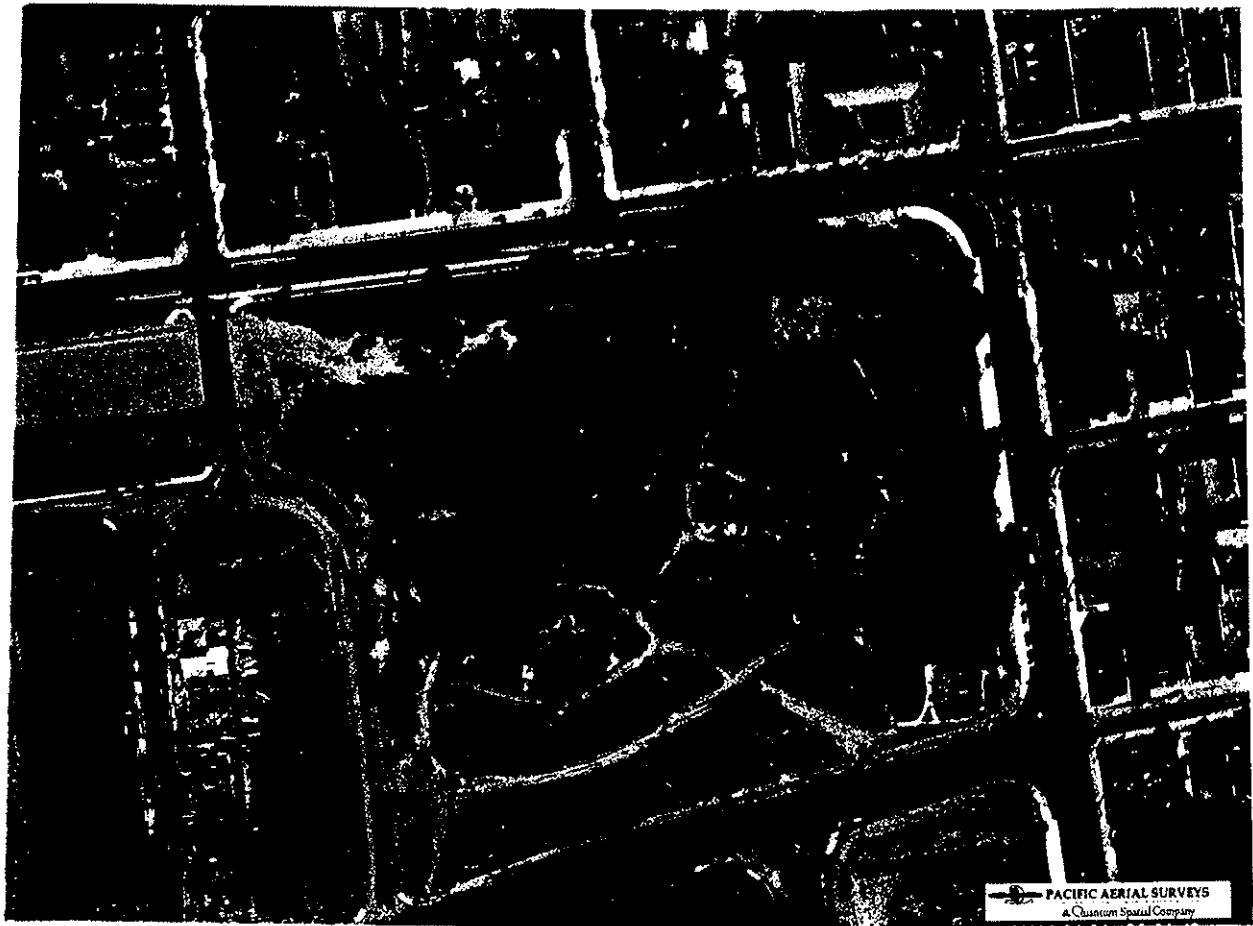


Figure 1. Former Laurel Hill Cemetery in 1948 before landscape features were removed.
Source: Pacific Aerial Surveys.



Figure 2. Aerial view of 3333 California Street property in 1955 after initial construction has begun. Trees from the Laurel Hill Cemetery that were retained are circled. Source: Pacific Aerial Surveys, annotated by Denise Bradley.

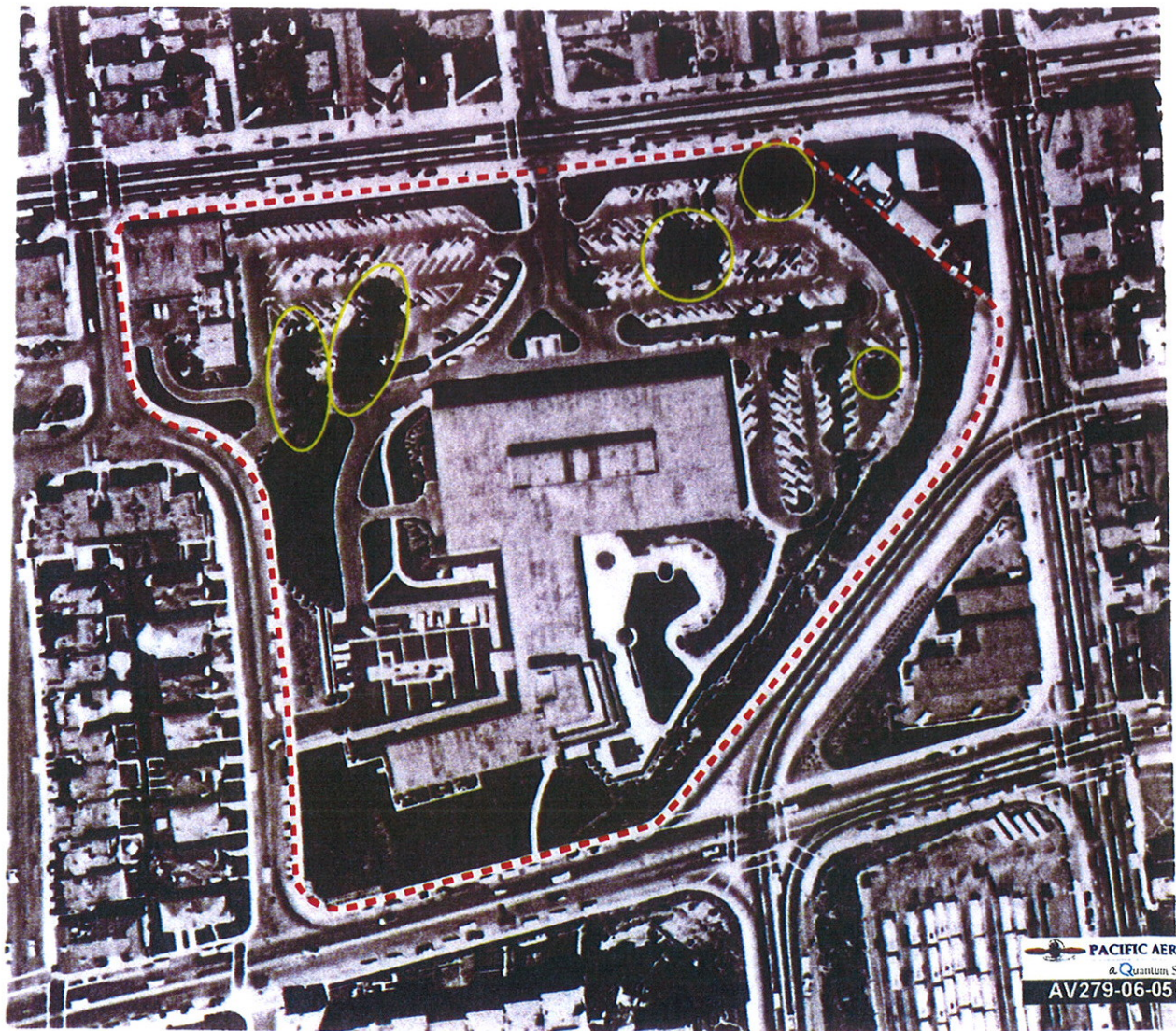


Figure 3. Aerial view of 3333 California Street property in 1958. Trees from the Laurel Hill Cemetery that were incorporated into the landscape design are circled. Source: Pacific Aerial Surveys, annotated by Denise Bradley.

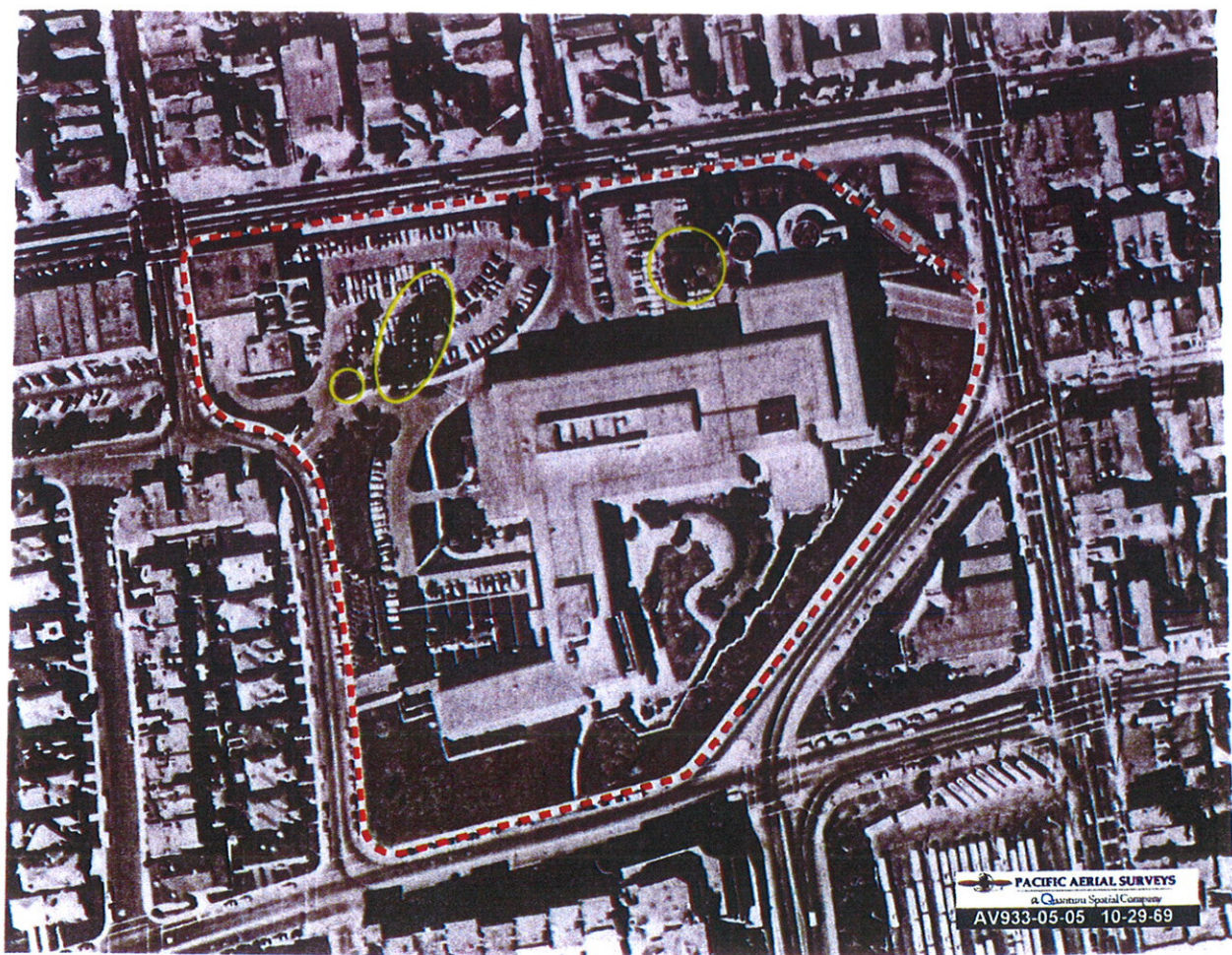


Figure 4. Aerial view of 3333 California Street in 1969 after the addition of the parking garage, auditorium, and office wing extension. Trees from Laurel Hill Cemetery that remain are circled. Source: Pacific Aerial Surveys, annotated by Denise Bradley.



Figure 5. Aerial view of 3333 California Street property today. Trees from Laurel Hill Cemetery that remain are circled. Source: GoogleEarth, annotated by Denise Bradley.

EXHIBIT 4

Calculation of Residential Square Footage

The following details the methodology for calculating the square footage, gross and net (residential) by building.

There are two scenarios:

Base Case builds 558 units;

Variant builds 744 units.

I have shown numbers for both scenarios although the footprints of the buildings do not change between scenarios.

For the 744 unit Variant the Walnut building increases from 4 floors to 7 floors.

In addition the Main building and the Mayfair building see an increase in numbers of units to achieve the 744 unit count.

The scenarios are shown in the attached tables, A & B, supported by diagrams and calculations.

For converting gross square feet to net square feet, I applied general efficiency factors provided by an experienced builder. The building efficiency factor is the percentage proportion of a building's rentable area, not counting the area occupied by elevators, equipment, hallways, stairways, lobby, restrooms, etc. ("efficiency"). These factors are shown in the tables.

MAIN BUILDING (existing)

Gross square footage was derived from Draft EIR Table 2.1 and Developers submission 7.3.2019 Dwg. AG.00.

WALNUT BUILDING (New)

The dimensions used to create the footprint were initially scaled from the Existing Site Plan (sheet CI.01 of 8-17-2017 submittal, attached) and then checked against the November 7, 2018 Draft EIR. The scaled dimensions are conservative as shown below.

Dimensions Along California St. Figure 1.

Laurel to Walnut for California St. Buildings Front & Back: I used 400ft but Figure 2.23 of the DEIR shows 412ft. In addition the wide {68ft) Walnut St., see Figure 2, entrance could offer additional space. Thus, the footprint was estimated conservatively.

Walnut to Credit Union for Walnut Building: I used 240ft but Figure 2.23 shows 245ft. in addition to the wide Walnut St. entrance.

Depth, North-South (N-5) Dimension of Walnut Building: Figure 3-Portico Removed (Configurations C&D Above)

I scaled the N-S available dimension for the enlarged Walnut Building to be 175ft which was used to create the building footprint. Figure 3 shows the dimension to be 176ft 3 inches.

I verified this by using Figure 4 which shows Plaza B has a 179ft 3 inches N-5 dimension (slightly different setback on California St.) and aligns with the Walnut Building along Mayfair Walk, Figure 5. Thus, the N-S dimension for the Walnut Building was estimated conservatively.

Overall the dimensions for the building's footprints correlate very closely, always on the conservative side, with the drawings.

CALIFORNIA ST. FRONT BUILDING (40ft. tall) (New)

The new building occupies the 400ft from Laurel to Walnut.

Base Case: consists of fourteen 4 story townhomes 75ft deep by 28.5ft wide.

Variant: consists of sixteen 4 story townhomes 75ft. deep by 25ft wide.

The handwritten diagram shows the configuration and dimensions.

Each unit is 75 ft. deep and shares a 25 ft. backyard.

CALIFORNIA ST. BACK BUILDING (40 ft. tall) (New)

The new building occupies the 375ft from Laurel to Walnut.

Base Case: consists of thirteen 4 story townhomes 28.5ft wide. The units vary in depth from 35ft. to 72ft. and are sculpted to provide a minimum 42ft. separation from the historic Monterey Cypress trees.

Variant: consists of fifteen 4 story townhomes 25ft wide. Same note as above applies.

The handwritten diagram shows the configuration and dimensions.

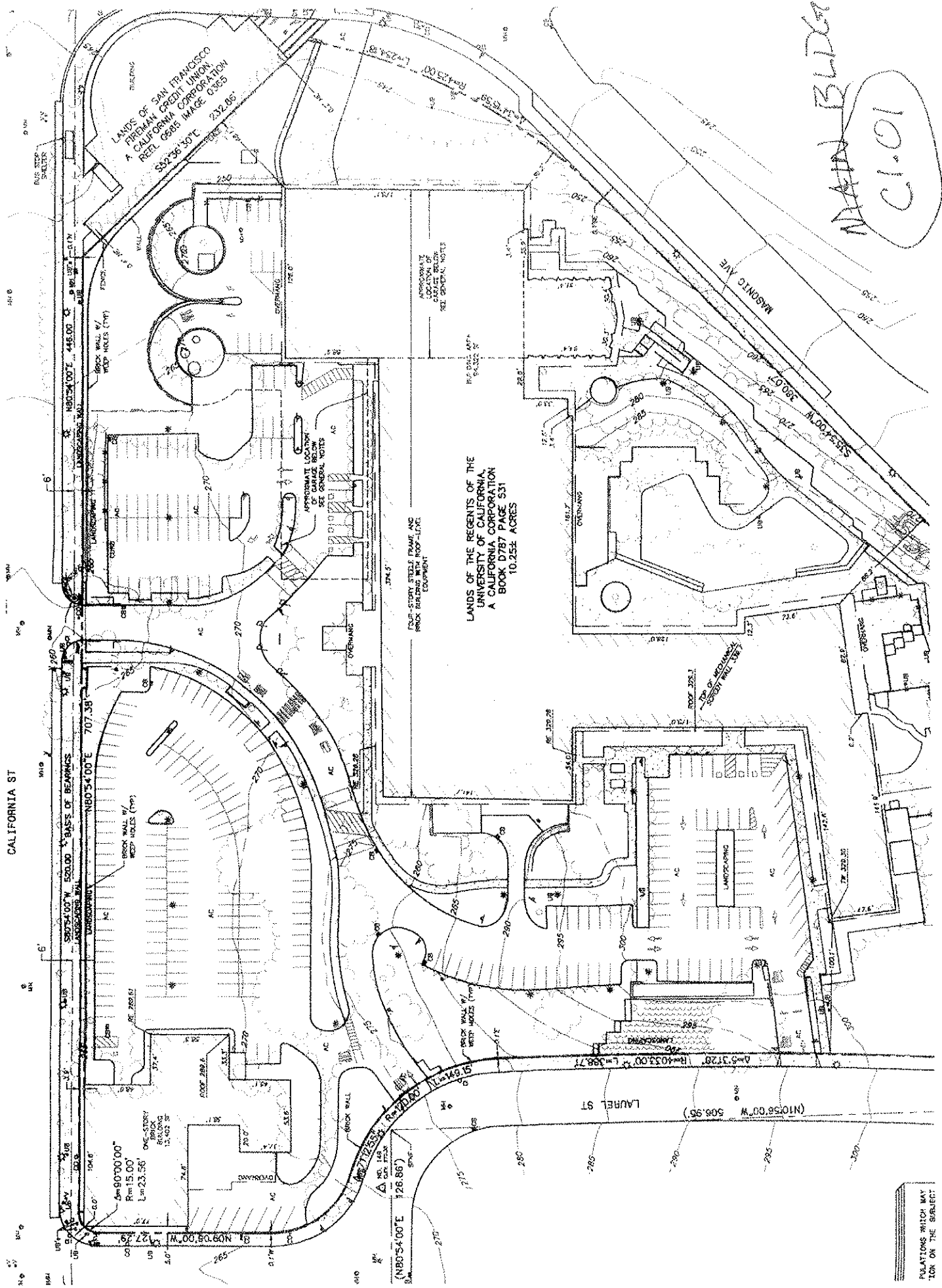
These units have no backyards.

MAYFAIR BUILDING

This new building consists of a rectangular shape and is situated along Laurel St.

The diagram shows the configuration and dimensions.

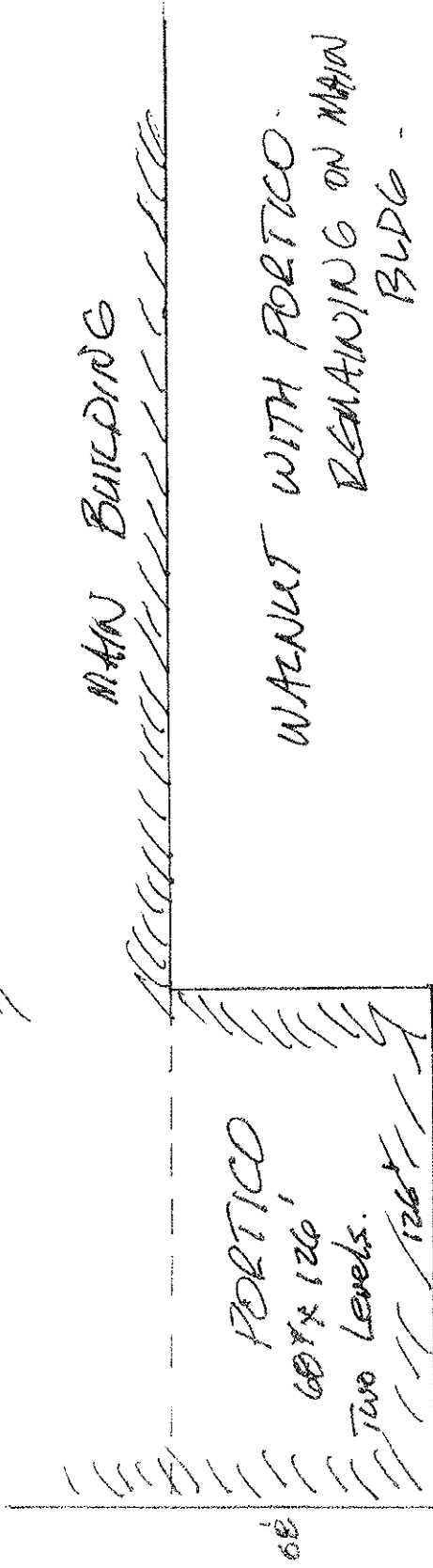
	A	B	C	D	E	F	G
1	A 3333 AVG. UNIT SIZE BASE CASE(558 Units) WITH PORTICO						
2							
3							
4	BUILDING	BUILDING FOOTPRINT	GROSS SQ. FT.	EFFICIENCY	NET SQ. FT. UNITS		AVG. SQ. FT per UNIT
5							
6							
7	Main Building with Portico	350,500	350,500	0.70	245,350	292	840
8							
9	Walnut-4 floors	31,825	127,300	0.75	95,475	118	809
10							
11	California Front- 28.5ft. Wide	30,000	120,000	0.85	102,000	56	1,822
12							
13	California Back-28.5ft. Wide	19,238	76,952	0.85	65,409	52	1,258
14							
15	Mayfair	13,500	54,000	0.75	40,500	40	1,012
16							
17	TOTAL		728,752		548,734	558	983



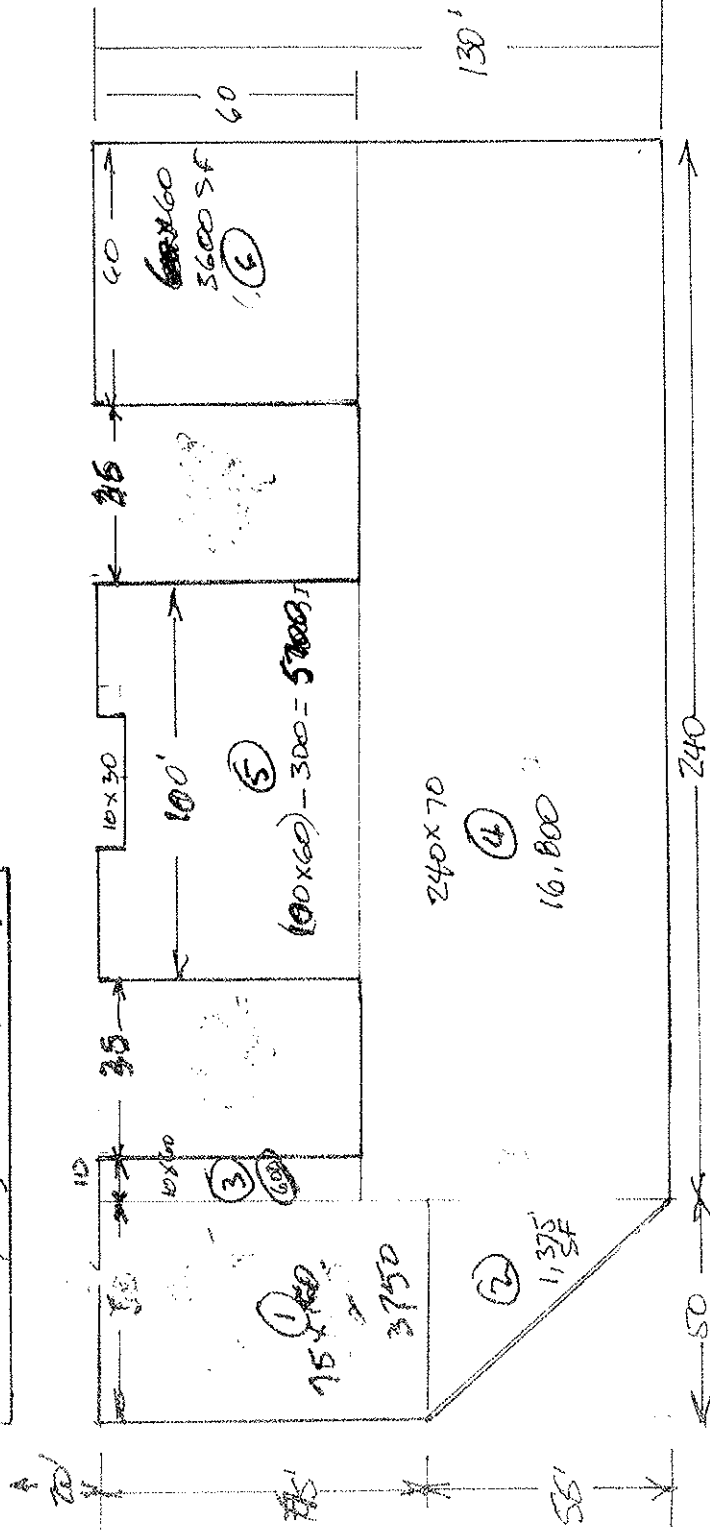
MAIN BLDG.
C1.01

RELATIONS WHICH MAY
EXIST ON THE SUBJECT

INTERIOR



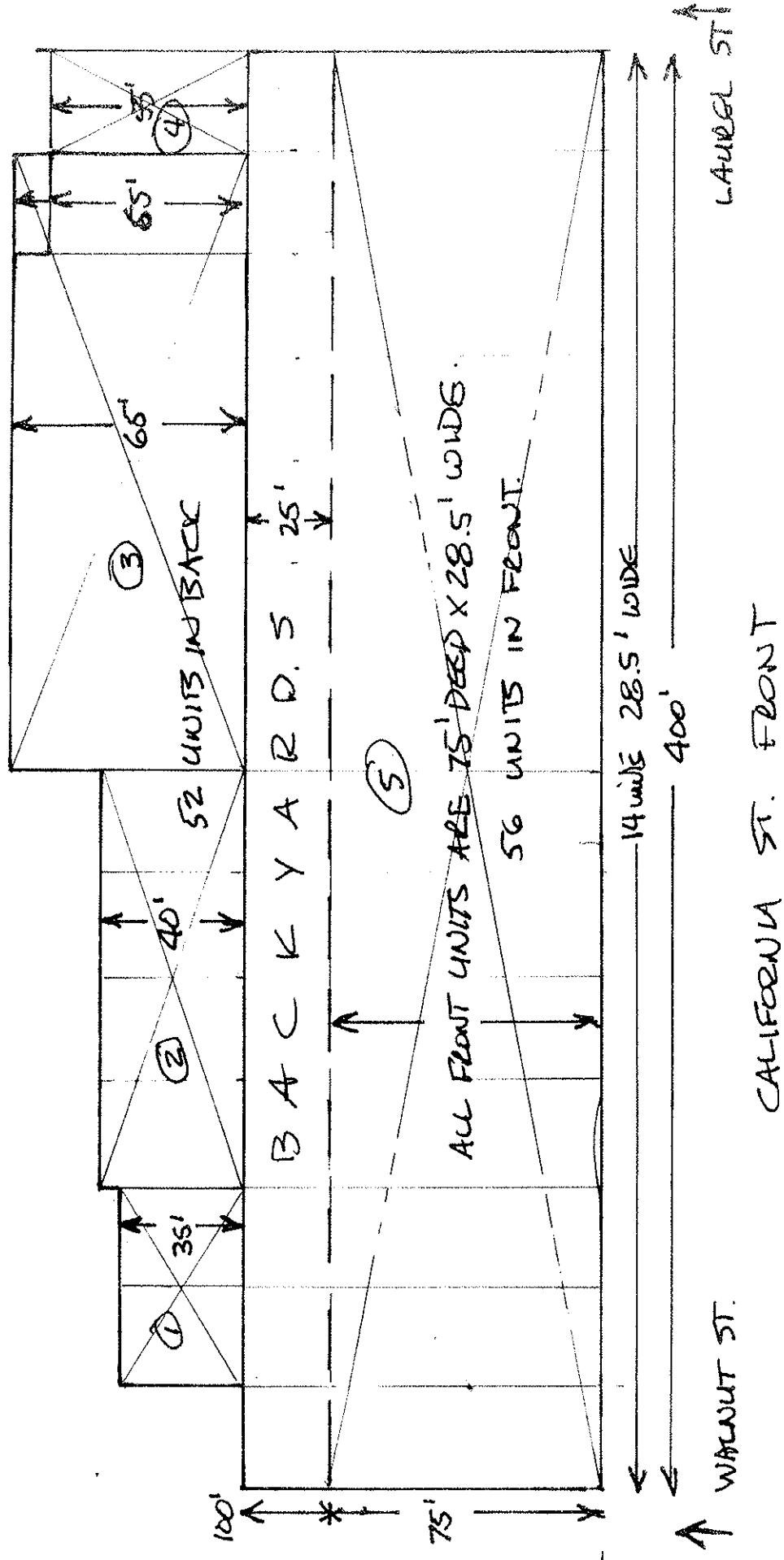
WALNUT WITH PORTICO.
REMAINING ON MAIN
BLDG.



TOTAL: 31,825 PER FLR. 855F
7 FLRS: 222,775 CSF
4 FLRS.

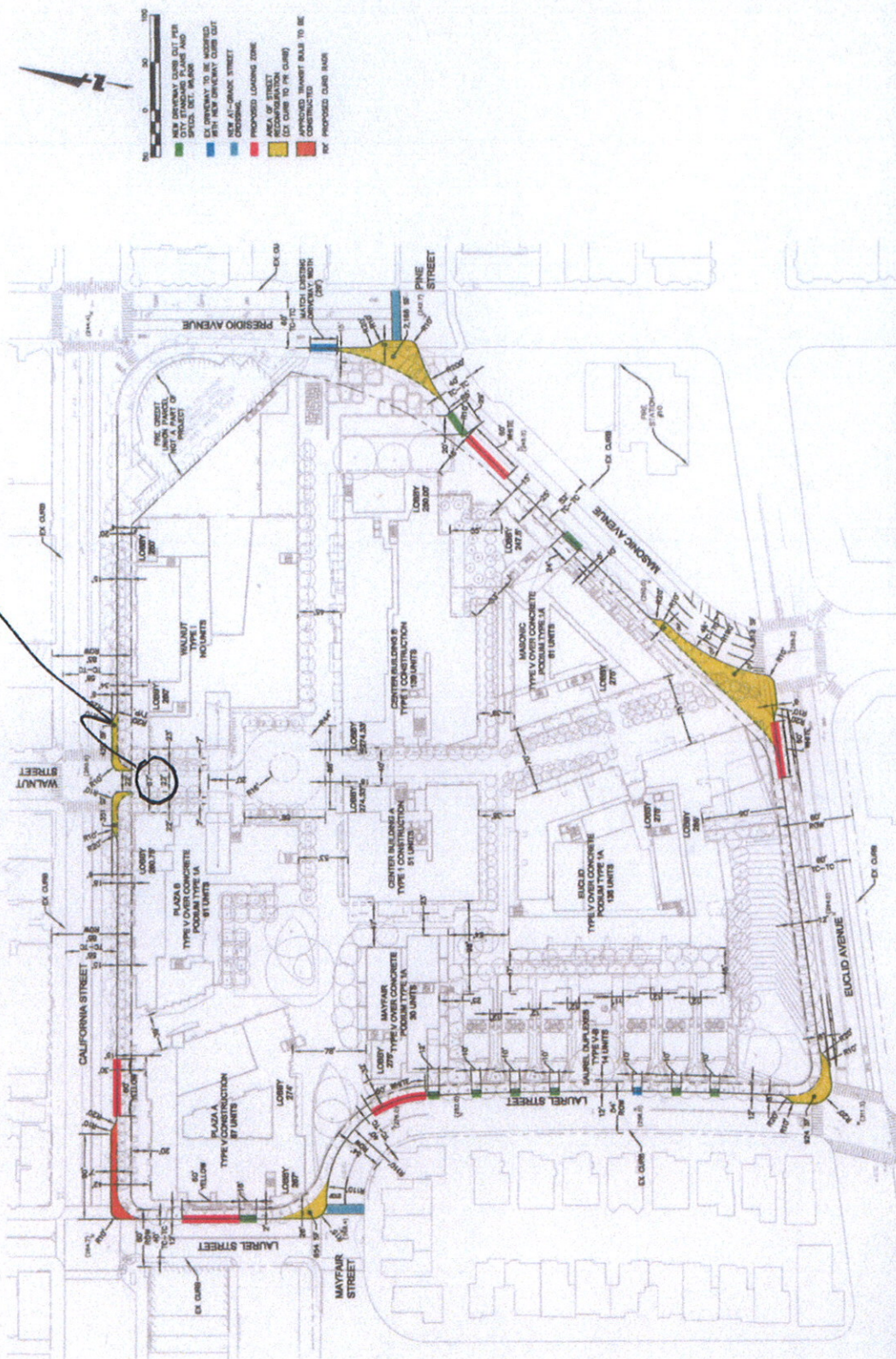
CALIFORNIA ST.

CALIFORNIA ST. BACK



BASE CASE

Walnut - 67' wide



PROPOSED SITE PLAN AND HORIZONTAL CONTROL PLAN

C2.02

3333 CALIFORNIA STREET SAN FRANCISCO, CA

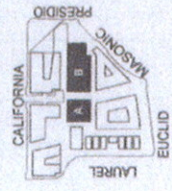
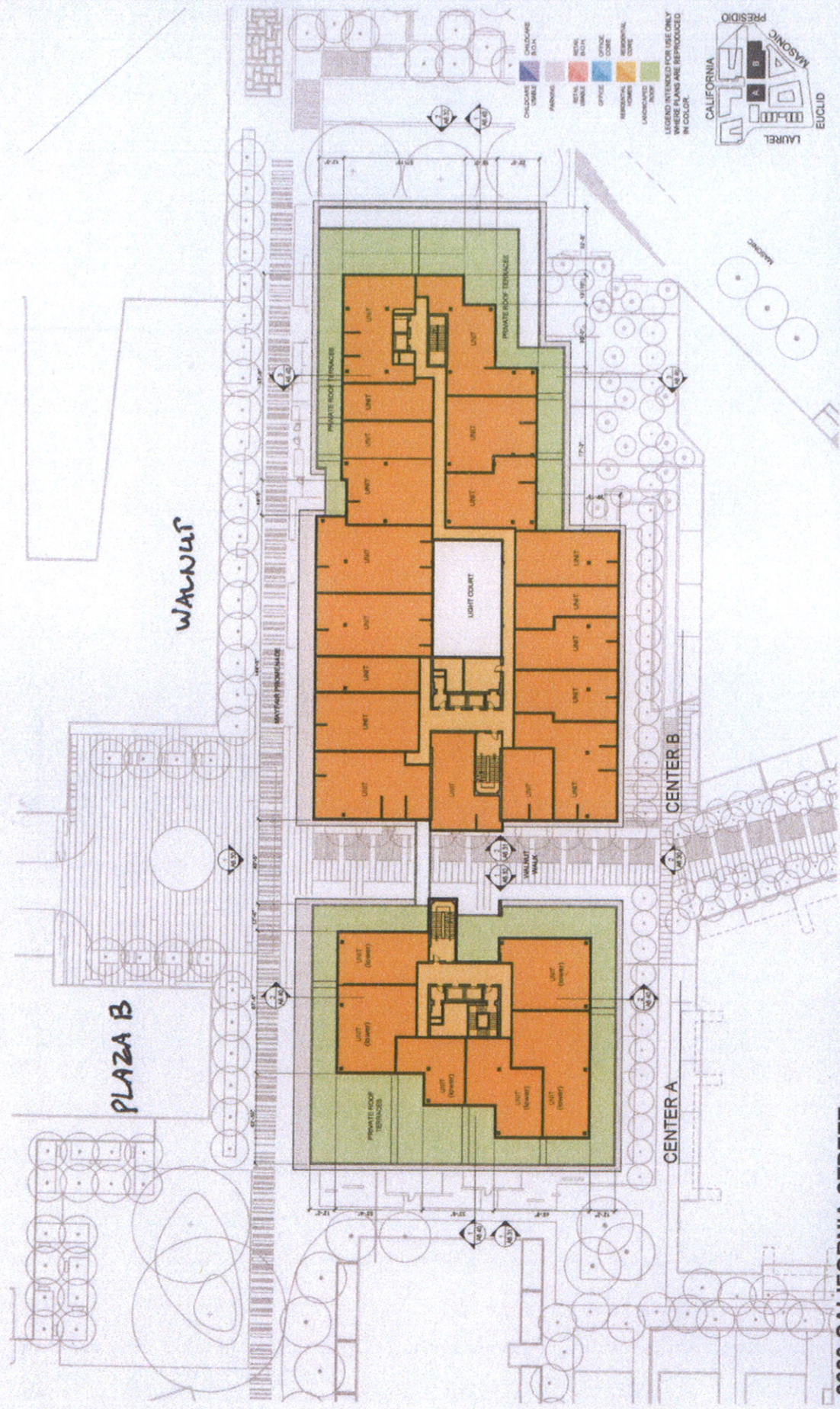
SKS JAMES CORNER FIELD OPERATIONS

ARUP BAR architects

JENSEN

SCE

08.17.2017 PLANNING APPLICATION SUBMITTAL



CENTER A & B: LEVEL L5 PLANS - elev. 329'-4"

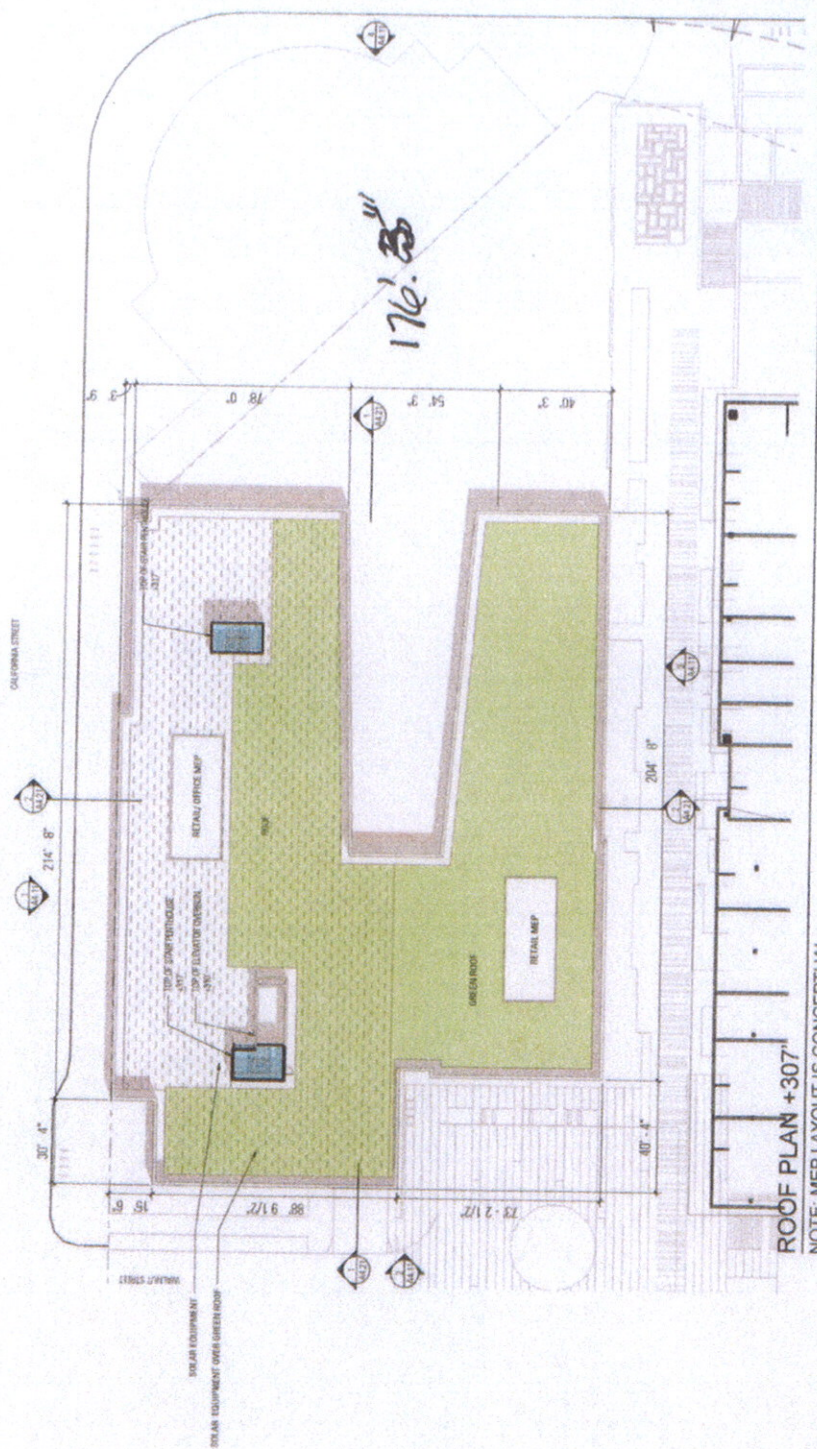
A6.17

06.17.2017
PLANNING APPLICATION SUBMITTAL

3333 CALIFORNIA STREET SAN FRANCISCO, CA

ARUP BAR architects **JENSEN** **SCB**

SKS **OPERATIONS**

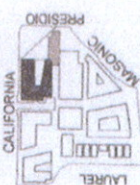


ROOF PLAN +307'

NOTE: MEP LAYOUT IS CONCEPTUAL

- | | | | | | | | | | |
|----------------------|----------------------|---------|------------------|------------------|--------|----------------|---------------------|----------------------|-------------|
| CHILD CARE
B.O.H. | CHILD CARE
USABLE | PARKING | RETAIL
B.O.H. | RETAIL
USABLE | OFFICE | OFFICE
CORE | RESIDENTIAL
CORE | RESIDENTIAL
HOMES | DISCOURAGED |
|----------------------|----------------------|---------|------------------|------------------|--------|----------------|---------------------|----------------------|-------------|

LEGEND INTENDED FOR USE ONLY
WHERE PLANS ARE REPRODUCED
IN COLOR.

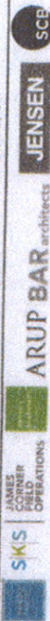


EUCLID
"WALNUT" BUILDING PLANS - LEVEL ROOF

08.17.2017
PLANNING APPLICATION SUBMITTAL

A4.05

3333 CALIFORNIA STREET
SAN FRANCISCO, CA



ARUP BAR architects

SKS
JAMES
CORNER
FIELD
OPERATIONS

CALIFORNIA BACK

175'

175'

FOOTPRINT: 11,730 sqsf

FOOTPRINT: 6,125 sqsf

7 TOWNHOMES x 25' WIDE
TOTAL OF 20

7 TOWNHOMES 25' WIDE
TOTAL OF 20

B A C K Y A R D S

16 TOWNHOMES x 25' WIDE

TOTAL OF 64

FOOTPRINT: 30,000 sqsf

WALKWAY ST.

CALIFORNIA FRONT

VARIANT

400'

LAUREL ST.

25'

1,575 sqsf

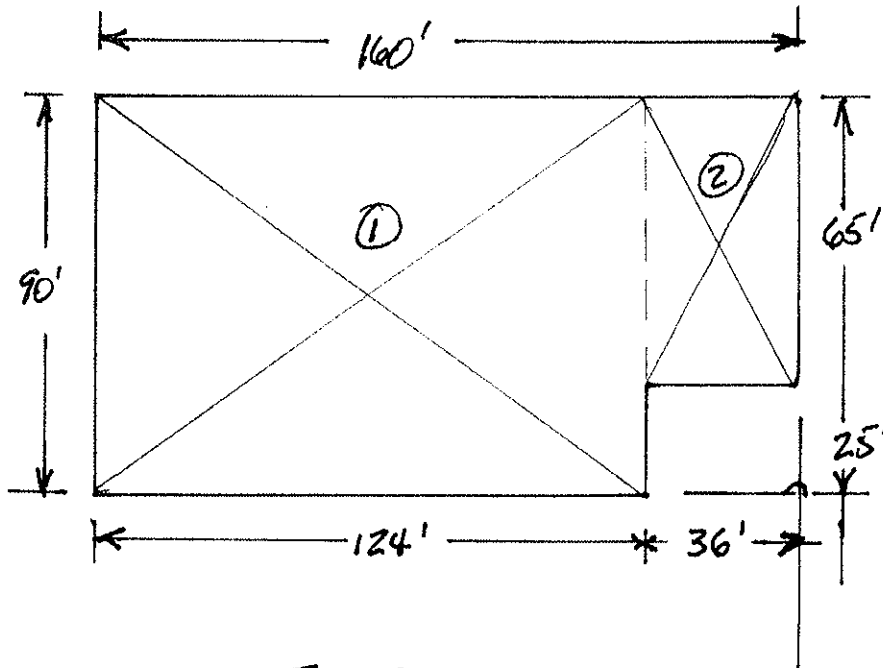
55'

4'

25'

75'

MAYFAIR BUILDING (4 Floors)



FOOTPRINT OF BUILDING

$$\textcircled{1} \quad \cancel{160'} \times \cancel{90'} = 11,160 \text{ GSF}$$

$$124' \times 90' = 11,160 \text{ GSF}$$

$$\textcircled{2} \quad 36' \times 65' = 2,340 \text{ GSF}$$

$$\text{FOOTPRINT} = 13,500 \text{ GSF}$$

$$4 \text{ FLOORS} @ 13,500 = 54,000 \text{ GSF} @ 0.75 = 40,500 \text{ NSF}$$

$$\text{VARIANT: 52 UNITS} = 779 \text{ NSF/UNIT} \quad (744 \text{ TOTAL})$$

$$\text{BASECASE: 40 UNITS} = 1,012 \text{ NSF/UNIT} \quad (558 \text{ TOTAL})$$

EXHIBIT 5

January 7, 2019

3333 California Street
San Francisco, California

Secretary of the Interior's Standards Compliance Evaluation

INTRODUCTION

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

METHODOLOGY

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

SIGNIFICANCE SUMMARY¹

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

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

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



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

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

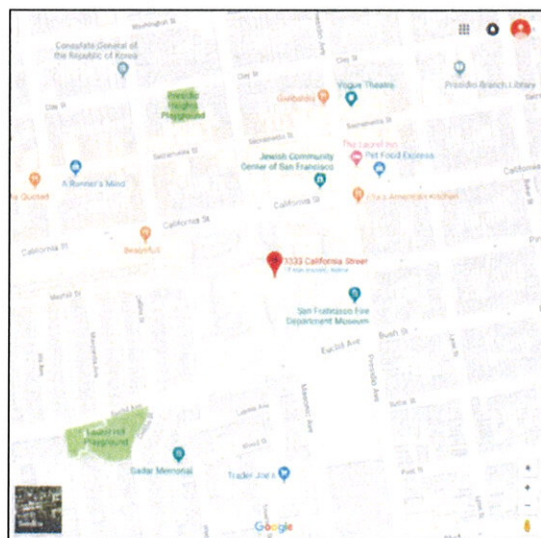


Figure 1 – Location Map

SUMMARY DESCRIPTION

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



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

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

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

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

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

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

Service Building

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

Landscape

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

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

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

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

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

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

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

PROJECT DESCRIPTION

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

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

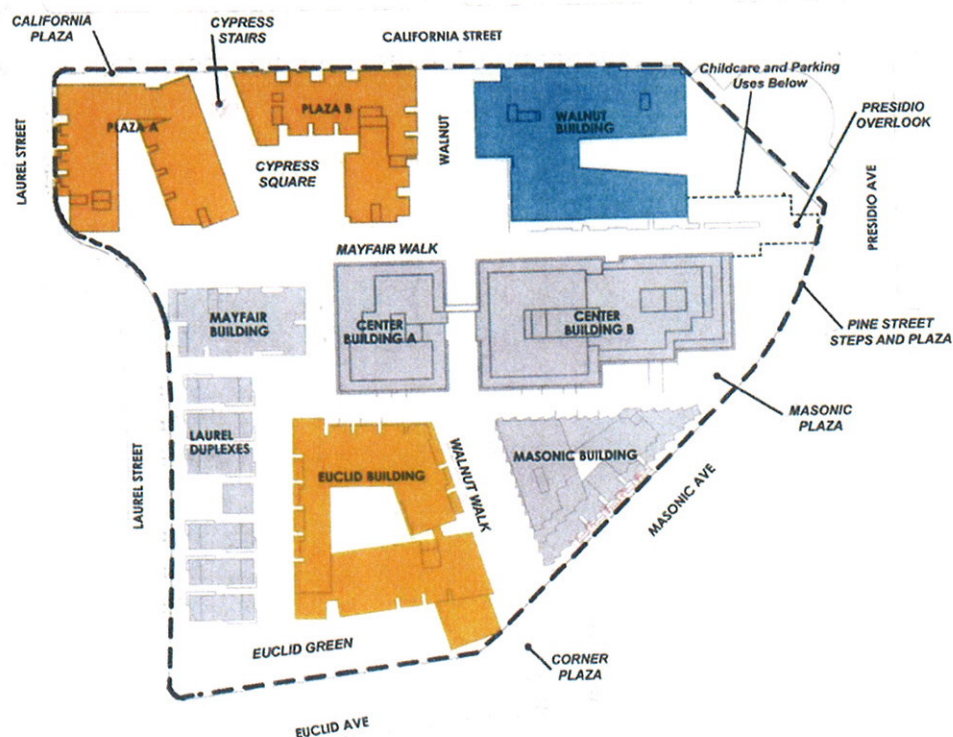
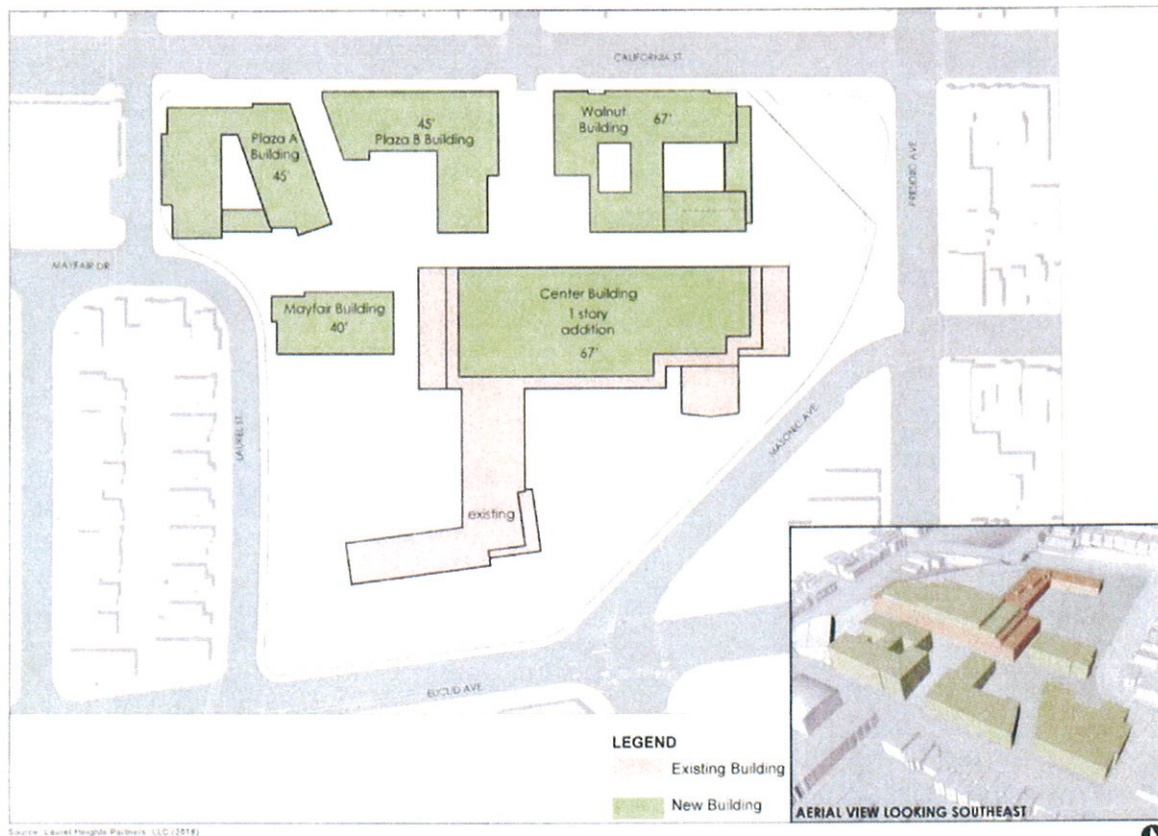


Figure 4 – The Proposed Project site plan

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

PRESERVATION ALTERNATIVE C

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



3333 CALIFORNIA STREET MIXED-USE PROJECT
 2015-014028ENV

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

Figure 5 – Full Preservation Alternative C

COMMUNITY FULL PRESERVATION ALTERNATIVE

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

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

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

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

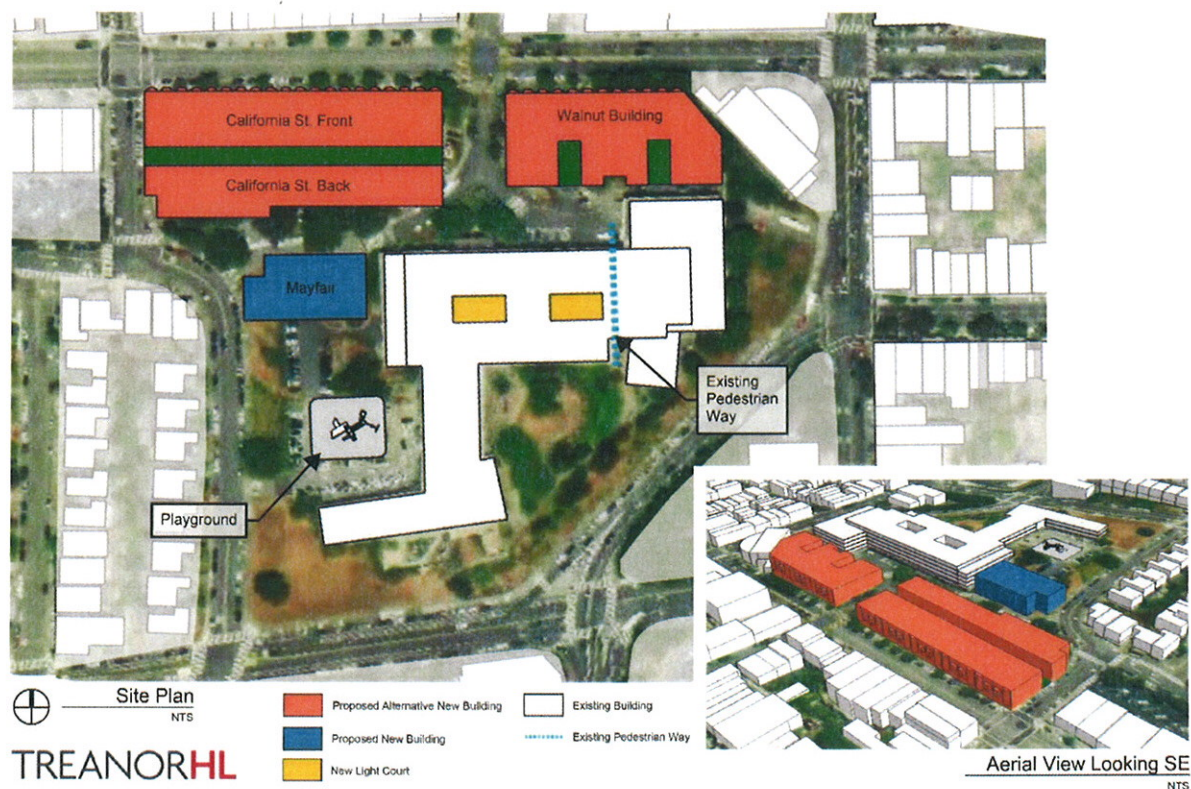


Figure 6 – The Community Full Preservation Alternative

SECRETARY OF THE INTERIOR'S STANDARDS ANALYSIS

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

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

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

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

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

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

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

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

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

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

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

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

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

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

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

The Proposed Project is demolishing too much of the Main Building and the landscaping to comply with Standard 5. Preservation Alternative C is superior to the Proposed Project but will have a greater impact on the property than will the Community Preservation Alternative. Alternative C proposes to replace the curtain wall and add a vertical addition, which could impact the building's horizontality, which according to the California Register Nomination is an important character defining feature. Therefore, while better than the Proposed Project, Alternative C does not fully comply with Standard 5.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design,

color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

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

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

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

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

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

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

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

According to the EIR, "Mitigation has been identified to reduce the potential impact to archaeological resources to a less-than-significant level. Thus, the Proposed Project or Project Variant would conform with Standard 8." If Alternative C and the Community Preservation Alternative follow similar protocols, then they too would comply with Standard 8.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

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

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

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

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

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

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

Conclusion

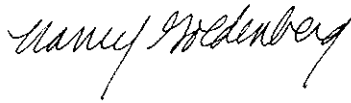
The above discussion evaluates the Community Preservation Alternative's compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation. It also discusses how and whether the Proposed Project and Alternative C complies with these standards. Here are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

Community Preservation Alternative: Complies with all 10 Standards

Proposed Project: Complies with Standards 3 and 8 only.

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

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



January 7, 2019

Nancy Goldenberg

Date