

Date: August 17, 2022

From: Frances Schreiberberg franceschreiberberg@gmail.com (510) 333-9907

To: Architectural Review Committee of the Historic Preservation Commission

My name is Frances Schreiberberg and I live at 353 Vallejo St, at the west corner of Prescott Court and Vallejo Street. I've lived on this very block since 1976, 46 years; I moved from across the street to my current home in 1980. I fought for parking spaces to avoid walking up the hill when I was pregnant and raised my daughter, who will be 39 this year, on this block, but would never consider moving because this neighborhood, Telegraph Hill, was iconic and I loved the small scale and historic nature of my block and the surrounding area, so similar to my previous neighborhood in Little Italy, bordering Chinatown, in NYC.

Want to thank those who prepared the Memo to the Architectural Review Committee for their thorough report. What concerns me and should concern the ARC, however, is that **TWICE** in the Memo it clearly states that buildings in the NE Waterfront Historic District are between 1 and 6 stories in height. On page 3, under 2 specific bullets, staff lays out the **Character Defining Features of the Conservation District**. Under **Characteristics** at top of page 4, staff writes: "building heights generally between 1 - 6 stories". Under **Overall Form and Continuity** in the next bullet point, staff writes: "building heights generally between 1 - 6 stories".

Yet in the Staff Analysis and Recommendations on page 4, there is nothing regarding this key characteristic. **Why is height not a critical concern when twice it's noted that these building heights are generally between 1 - 6 stories? Why is that not a recommendation in this report. It should be a recommendation from this Committee to the Historical Review Commission.** It is not sufficient to focus merely on the Façade Line, the architectural base, and the ground floor fenestration.

The height and mass of this project is clearly at issue as a CLEARLY defined characteristic of this historic district is buildings from 1 - 6 stories in height. Not only is the height an issue, it may be the most important one as the proposed building is not only out of character with the NE Waterfront Historic District but also with the neighboring over 100-year old homes on our block, up Vallejo Street, across Prescott Court and Hodges Alley, and even onto the Vallejo Steps.

By comparison existing current taller buildings in the District are NOT adjacent to residential streets that have a 40' height limitation, but rather are located at the base of Telegraph Hill up against steep and unbuilt parcels of land.

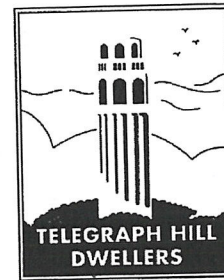
Staff has pointed out the basis for this Committee to recommend a building that is truly in character with our neighborhood although it has not taken the further step of directing a height reduction. Nevertheless, a reduction in height to what is consistent with this NE Waterfront District is in order.

In conclusion, I would ask, on behalf of all of us who live in this community, that this Committee direct the project proponents to reduce the height of this building to conform to the historic district characteristics, maintain the continuity of our neighborhood, and respect the over 100 year-old history of Telegraph Hill.

Thank you for your time and attention to this matter.

August 12, 2022

Architectural Review Committee
SF Historic Preservation Commission
49 South Van Ness Avenue, Ste 400
San Francisco, CA 94103
(Via email: commissions.secretary@sfgov.org)



RE: OPPOSITION to 955 Sansome Street (2021-012714COA)

Dear ARC Chair Nageswaran and Commissioners,

We understand that the Architectural Review Committee (ARC) of the Historic Preservation Commission (HPC) is meeting on August 17, 2022 to consider a proposed project at 955 Sansome. Please accept this comment letter on behalf of the Telegraph Hill Dwellers (THD) for that ARC meeting.

THD stands strongly with neighbors in opposing this project as proposed for reasons that include the following.

Project Oversized, Not In Scale

The staff memorandum¹ for this ARC hearing asks you to consider façade line continuity, refinement of the architectural base of the first three floors, the rhythmicity of the window design pattern, and a reduction in the size of the awning at the residential lobby. We would suggest that there are many more important architectural issues that you should also be considering as discussed in this letter.

Take size and scale, for example. Located in the Northeast Waterfront Historic District (**Figure 1**), this project would demolish an existing three-story garage and construct a new 10-story building rising as high as 120 feet above its base on Sansome. Oversized and out of scale (as shown in **Figures 2 and 3**), this proposed building would be

- Multiple-stories taller than any other building in the historic district
- Nearly three times taller than the average building in the historic district along Sansome
- Three times taller than the 40-foot height limit of the immediately adjacent uphill historic neighborhood in the same block.

Adding unnecessarily to the building's height and size, proposed units would be from twice to three times the average size of residential units in the surrounding area. The building also would have 21 two-story town house units, including nine two-story penthouses.

¹ "Memo to the Architectural Review Committee of the Historic Preservation Commission." San Francisco Planning, San Francisco, CA. August 17, 2022.

Does Not Comply With Secretary of Interior Standards

From the Planning Department's Preservation Bulletin No. 20,² we understand that: "The purpose of the ARC is to provide early direction, comments and advice on projects submitted for review by the HPC early in the design process," thereby helping project sponsors "...comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and the adopted review standards of the HPC." Compliance with the Secretary of the Interior's Standards is required by Sec. 1006.6. of Article 10 of the Planning Code.

The National Trust for Historic Preservation (NTHP) has published a document³ entitled "Regulating New Construction in Historic Districts" that enumerates basic principles for design review of such projects, including judging their compatibility. In addressing new construction, the document draws upon Standard 9 of the Secretary of the Interior's Standards for Rehabilitation,⁴ which states that:

*"9. New addition, 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.**" [bolding added]*

Consistent with Standard 9, the NTHP document recommends that the design of a proposed new construction project be evaluated for its compatibility with the surrounding historic district based on a number of criteria, including height, massing, proportion, and scale. The document states that:

- *"The height of the new construction should **fall within the ranges seen for the block...**"*
- *"If the development is large and will affect more than one block when it is built, reviewers may **need to look at the streetscape elevations and block plans for a few blocks,**" and*
- *"...designs reflecting current styles and tastes **should use siting, massing, proportion and materials to achieve compatibility with the surrounding district.**" [bolding added]*

The proposed project clearly does not meet these compatibility criteria.

² Preservation Bulletin No. 20. "The Architectural Review Committee of the Historic Preservation Commission." San Francisco Planning, San Francisco, CA.

³ NTHP. "Regulating New Construction in Historic Districts." National Trust for Historic Preservation, 1785 Massachusetts Avenue, NW, Washington, DC.

⁴ "Secretary of the Interior's Standards for Rehabilitation." Codified as 36 CFR 67, Technical Preservation Services, National Park Service, U.S. Department of the Interior, Washington, DC.

Does Not Meet Requirements for COA

A Certificate of Appropriateness (COA) is required under Sec. 1006(1), without which, under the conformity and permit provisions of Sec. 1005, no City permits can be issued. To approve a COA, the HPC must make certain findings under Sec. 1006.6, including the following:

*“(d) For applications pertaining to property in historic districts, other than on a designated landmark site, **any new construction, addition or exterior change shall be compatible with the character of the historic district... for any exterior change where the subject property is not already compatible with the character of the historic district, reasonable efforts shall be made to produce compatibility, and in no event shall there be a greater deviation from compatibility...**” [bolding added]*

Unless the project is significantly revised, we believe that the HPC will be unable to make the above required Sec. 1006.6(d) finding. As proposed, the building would be substantially higher and more massive than adjoining structures, it would not conform to the prevailing character of the Northeast Waterfront Historic District, and it would constitute a materially greater deviation from compatibility than the existing structure.

Building Not In Character With Historic District

The developer's own rendering in **Figure 2** clearly shows that the building is too tall, too massive, and too out of character with the historic district. Its impact on the historic district and the adjacent historic neighborhood would be profound, as shown in **Figure 3** and as viewed from other nearby locations in **Figures 4 through 8** (approximate building envelope shown).

Figure 3 shows that, rising up to 120 feet above Sansome, the proposed building would significantly exceed the heights of other buildings along Sansome in the historic district. As shown on this figure, the average height of those buildings above the Sansome streetscape is 43 feet, barely a third of the street frontage height of the proposed building.

The only historic building in the historic district that rises to a height of 84 feet above Sansome is the Ice House. Built in 1914 for the National Ice and Cold Storage Company, it is located at the extreme northwest corner of the historic district at Union and Sansome and abuts Levi Plaza.

In contrast, the proposed building would exceed a height of 84 feet above Sansome by multiple stories. Further, unlike the location of the Ice House at the base of a steep cliff face far below the Telegraph Hill Historic District, the proposed 10-story building at the corner of Vallejo and Sansome would tower over the many residential buildings on Vallejo up to Montgomery and would dwarf those on Hodges Alley and Prescott Court to the west of the project site [see **Figures 2, 3 and 4(a)**], significantly impacting this well-preserved historic area described by planning staff as follows:⁵

“Eligible Southeast Telegraph Hill Historic District - California Register-eligible historic district significant under Criterion 1 (Events) and Criterion 3 (Architecture), the District is composed of buildings sited along the southeastern

⁵ “Part 1 Historic Resource Evaluation Response.” SF Planning, San Francisco, CA.

slopes of Telegraph Hill that represent a cohesive development pattern associated with rebuilding efforts following the 1906 earthquake.”

The boundaries of this California Register-eligible historic district were delineated previously by the Planning Department⁶ as follows:

“Thus, this small potential district remains one of the best preserved areas on the southern and eastern slopes of Telegraph Hill. The preliminary boundaries of this district begin with the residential development along Vallejo Street west of Sansome Street (parcels 0134/003 and 0143/034). The boundaries continue west along Vallejo Street to Montgomery Street, including the properties located along Hodges Alley and Prescott Court, but excluding the building on the southeast corner of Montgomery and Vallejo streets. The district then runs north along both side of Montgomery Street to its intersection with Green Street, where it runs briefly west along the southside of Green Street to parcel 0133/0404.”

Note that the incompatible height of the proposed building is contributed to by the size of the proposed residential units. At an average size of 2,200 square feet, they would be nearly three times larger than the square footage of nearby homes (a survey previously conducted by THD of more than four hundred residential units near the top of Telegraph Hill found that the average unit size was about 830 square feet). Also, 21 of the proposed units are two-story, including nine two-story penthouse units, reflected in the incompatible size and height of the building.

In closing, we share our historic perspective for the reason several lots along the Sansome corridor, including the project site, are zoned at 84 feet. Predating the destruction of the Embarcadero Freeway, the current zoning was likely intended to accommodate the now-demolished freeway offramp and the long-abandoned plans for extension of the Embarcadero Freeway around or through Telegraph Hill (e.g., see historic photo⁷ in **Figure 9**).

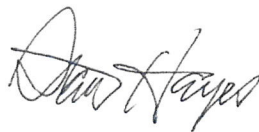
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In closing, we offer the following recommendation:

RECOMMENDATION: We urge you to require that the size and height of the proposed building be materially reduced and redesigned to be compatible with the historic district and the adjacent historic neighborhood.

We look forward to the further and substantive modification of this project to address the concerns outlined above.

Sincerely,



Stan Hayes



Nancy Shanahan

Co-Chairs, Planning & Zoning Committee

⁶ Lammers. “Historic Resource Evaluation Response, November 4, 2013, 26 Hodges Alley.

⁷ “Interstate 480, Golden Gate Freeway.” Downloaded from www.ocf.berkeley.edu/~dlkriske/highway/480/.

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Figure 1 – 955 Sansome is located in the Northeast Waterfront Historic District.

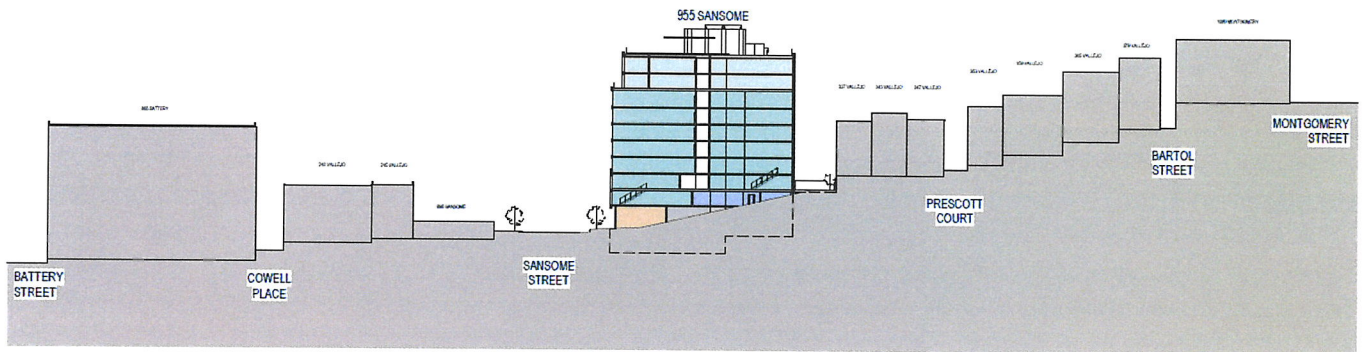
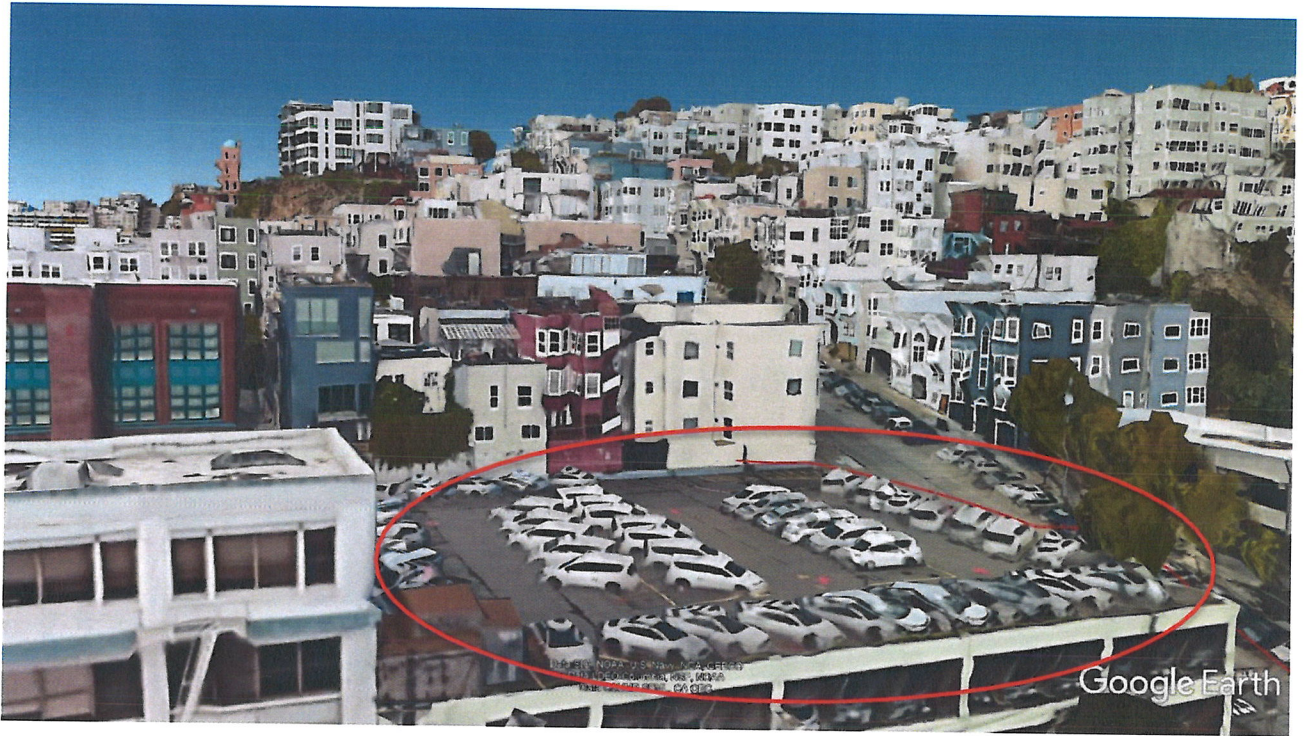


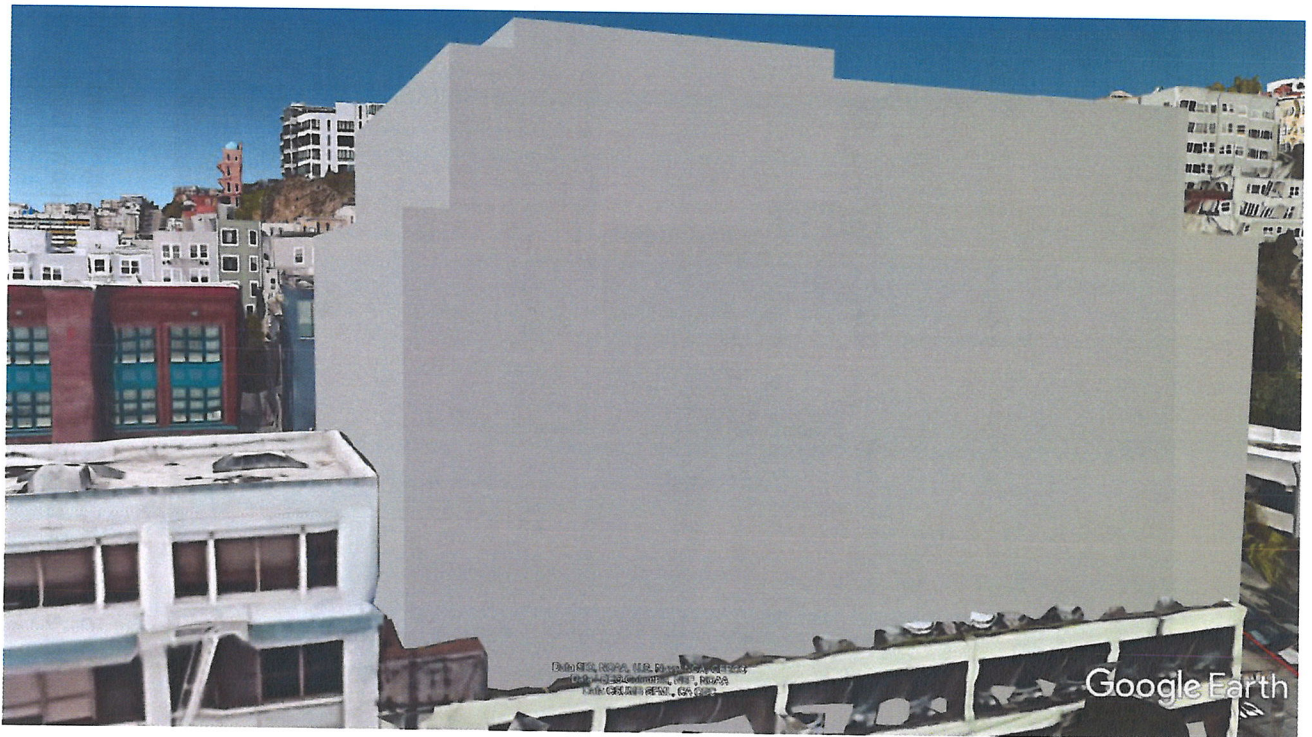
Figure 2 – 955 Sansome would be significantly taller and more massive than adjoining buildings (obtained from developer's section rendering).



Figure 3 – 955 Sansome, at 120 feet above Sansome, would be incompatible with the height and scale of adjoining buildings in historic district along Sansome (note: brown line shows boundary of historic district).

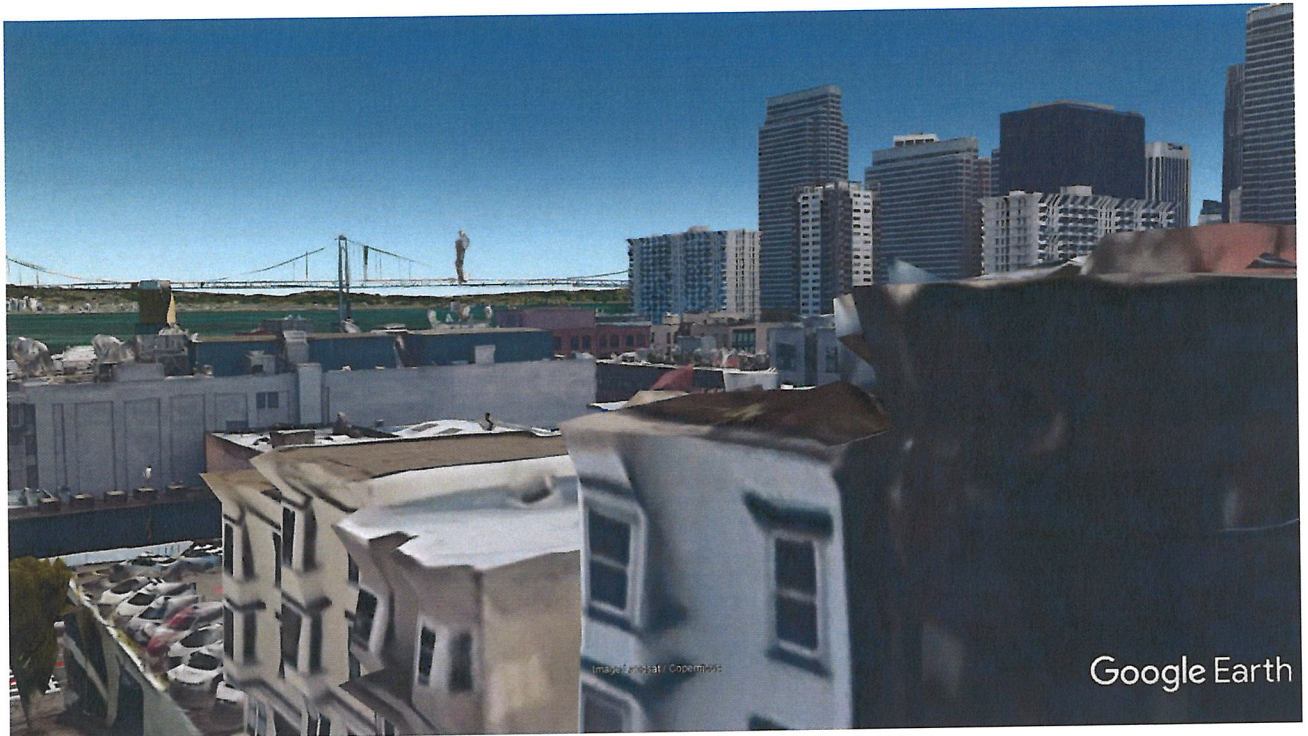


(a) Currently (note also nearly fifty cars on third floor of garage)

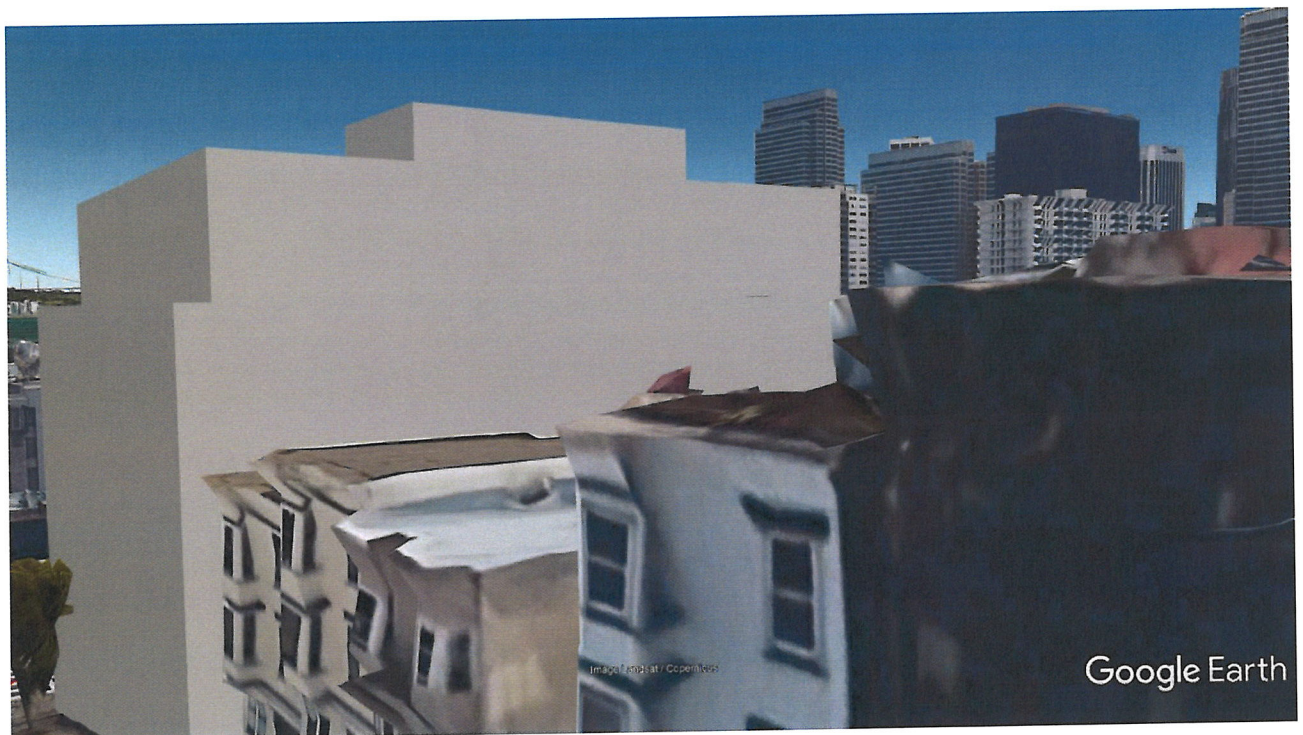


(b) With proposed building

Figure 4 – View toward adjoining homes whose light and air would be blocked.



(a) Currently

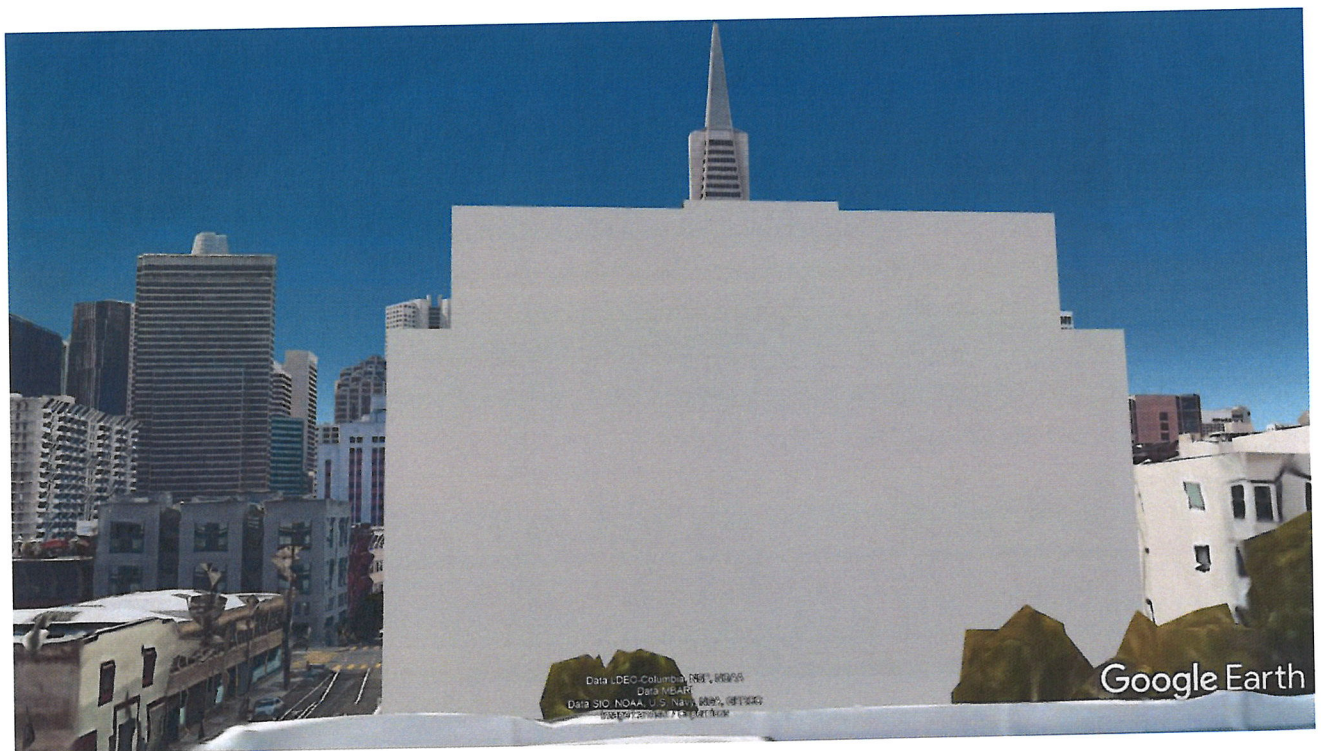


(b) With proposed building

Figure 5 – View from uphill, south side of Vallejo.



(a) Currently

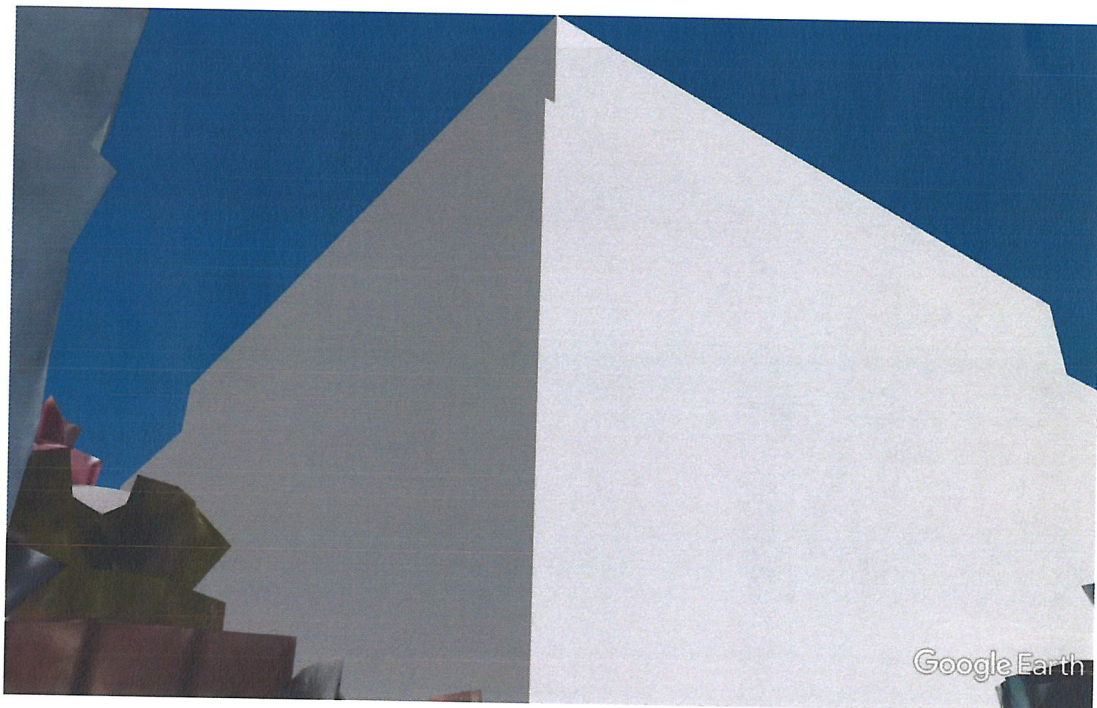


(b) With proposed building

Figure 7 – View from 1025 Sansome to north across Vallejo (location of proposed roof deck).



(a) Currently



(b) With proposed building

Figure 8 – View from playground of John Yehall Chin Elementary School.



Figure 9 – Historic photo showing long-abandoned Embarcadero freeway proposed extensions under consideration in the 1960s (contemporary with legacy 84-foot height limit along base of Telegraph Hill).

