



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: December 12, 20118

TO: **Historic Preservation Commission**

FROM: Pilar LaValley, Preservation Planner, (415) 575-9084
Tim Frye, Historic Preservation Officer, (415) 575-6822

RE: Informational Presentation for
Historic Resource Assessment – Pilot Program

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Attached please find materials related to the Historic Resource Assessment (HRA) – Pilot program, which is a new process that the Department will be piloting in 2019. The Department has developed this new process to provide property owners with a preliminary assessment of the historic resource status of their property in advance of expending resources developing materials for a project application with the Department.

BACKGROUND

With approximately 19 percent of properties in the City surveyed to date, most of the age eligible properties are tagged as Category B (“Unknown”) for purposes of review under the California Environmental Quality Act (CEQA). Until adoption of the Citywide Cultural Resource Survey, which is a multi-year, phased effort, these Category B (“Unknown”) categorizations will remain unless a project application triggers evaluation under CEQA. Submittal of such an application, to be considered complete and acceptable by the Department, requires preparation of a detailed scope of work and associated architectural plans. The public, particularly members of the Public Policy and Advocacy (PPAC) and Small Firms (SFC) committees of AIA SF, have advocated for a process by which the Department could provide guidance related to the historic resource status of a property in advance of expenditures of time and resources to develop project scopes and plans.

HISTORIC RESOURCE ASSESSMENT – PILOT PROGRAM

The Department has developed the following Historic Resource Assessment (HRA) pilot process to address two issues; first, the intent of the process is to provide property owners with a preliminary assessment of the potential historic significance of a property; and second, the process increases the annual number of age eligible properties documented for the purposes of the Citywide Cultural Resource Survey by allowing property owners to file for an assessment of their property before survey documentation may be scheduled for their area.

The Historic Resource Assessment (HRA) is intended to provide preliminary feedback from the Planning Department regarding whether a property is eligible for listing on the National Register of Historic Places (NR) and/or California Register of Historical Resources (CR) before development applications are filed. This preliminary assessment provides property owners with information about the eligibility of their property in advance of the Citywide Cultural Resource Survey, and in advance of preparation and submittal of a project application. This process shall only be undertaken at the request of a property owner, or their authorized agent, and is not required in advance of any future applications with the Department. For more information on how the HRA will inform the Citywide Cultural Resource Survey, please review the “Process” section below.

The HRA represents a preliminary assessment of the subject property's potential historical significance based on the information available at the time of the assessment and is not a formal determination pursuant to the California Environmental Quality Act (CEQA). This assessment is subject to change during evaluation of the property and surrounding neighborhood as part of the Citywide Cultural Resources Survey or if new information becomes available during subsequent review of a project application. Further, the HRA application is not a development application, and issuance of a HRA letter is not a development approval or denial.

Any property owner or authorized agent of a property owner may file an HRA application. However, property owners should not submit an HRA application if their property is identified in the Preservation Tab on the Department's Property Information Map as a Category A ("Known Historic Resource") or Category C ("determined NOT to be a historic resource / not age eligible").

PILOT PROGRAM

The Historic Resource Assessment (HRA) process is being undertaken by the Department as a Pilot Program in 2019. During the pilot period, the Department will target a 60-day response time and will charge an application fee that is the equivalent of the Project Review Meeting Application Fee plus time and materials. The Pilot period is intended to assist the Department and public in measuring the efficacy of the new process and identifying appropriate staffing levels and application fees for the process going forward. The pilot is intended to begin on January 2, 2019.

PROCESS

The HRA application (attached) requests information about a property that is identical to what is currently requested in the Supplemental Information Form for Historic Resource Determination. This information is outlined in "How to Research a Property's History" included in the HRA application. The property owner or their authorized agent can conduct the property research necessary to prepare and submit the HRA application. Although it is not required, the applicant may hire a consultant to conduct the property research and prepare the HRA application.

Information in the application will be reviewed by the Planning Department's Preservation staff. The Department's review of the application will not begin until it is determined that the material submitted is complete. Preservation staff will review the submitted material, conduct limited archival research, as necessary, and conduct a site visit before preparing a response assessing whether the property appears eligible for the NR and/or CR. Assessment of eligibility will be based on the NR and CR criteria for evaluation and guidelines for assessing integrity. The criteria for eligibility being utilized in the HRA process will be the same as that applied during survey evaluations and historic resource determinations for CEQA review. The Department will issue an HRA letter to the applicant outlining the preliminary assessment. In some cases, the assessment may be inconclusive pending additional information as part of a formal determination pursuant to CEQA.

Where an assessment is conclusive, the property will be recategorized in the Preservation Tab on the Department's Property Information Map and subsequent project applications will be reviewed accordingly with the caveat that the HRA is preliminary pending the Citywide Survey or a formal CEQA determination in a subsequent project application. If no new information becomes available during subsequent review of a project application, then the assessment provided for the property in an HRA will be accepted as final.

As noted previously, the assessment in the HRA is subject to change during evaluation of the property and surrounding neighborhood as part of the Citywide Cultural Resources Survey. All properties that request and receive an HRA will be flagged in the Citywide Survey effort to provide background information. If no new information is readily available or located at the time of the Citywide Survey, the HRA assessment will be included as part of the survey findings and forwarded to the Historic Preservation Commission for final adoption.

ATTACHMENTS

Historic Resource Assessment (HRA) – Pilot Program Application

Letter from David Gast, dated December 6, 2018

Letter from AIASF, dated December 11, 2018



HISTORIC RESOURCE ASSESSMENT (HRA) 2019 PILOT PROGRAM

APPLICATION PACKET

The Historic Resource Assessment (HRA) provides preliminary feedback from the Planning Department regarding whether a property is eligible for listing on the National Register of Historic Places (NR) and/or California Register of Historical Resources (CR) in cases where a property's historic resource status is unknown (i.e. a Category B – Unknown Historic Resource Status). This preliminary assessment provides property owners with information about the eligibility of their property in advance of the Citywide Historic Resource Survey, which is a multi-year, phased effort, and in advance of submitting a Project Application for development or alterations. This process may only be undertaken at the request of a property owner, or their authorized agent, and is not required in advance of any future applications with the Department.

The HRA represents a preliminary assessment of the subject property's potential historical significance based on the information available at the time of the assessment and is not a formal determination pursuant to the California Environmental Quality Act (CEQA). This assessment is subject to change during evaluation of the property and surrounding neighborhood as part of the Citywide Historic Resources Survey, or if new information becomes available during subsequent review of a Project Application. The HRA is not a development application, and issuance of an HRA letter is not a development approval or denial.

The HRA process is being undertaken by the Department as a 12-month pilot program effective January 1, 2019. During the pilot period, the Department will target a 60-day response time. The Pilot period is intended to assist the Department and public in measuring the efficacy of the new process and identifying appropriate staffing levels and application fees for the process going forward.

HOW DOES THE PROCESS WORK?

The property owner or their authorized agent may conduct the property research necessary to prepare and submit the HRA application, or the applicant may hire a consultant to conduct the property research and prepare the HRA application. All resources listed in this application that are relevant to the subject property must be researched and submitted. For more information on how to compile the required information, refer to "How to Research a Property's History" section of this document.

Information in the application will be reviewed by the Planning Department's Preservation staff. The Department's review of the application will not begin until it is determined that the material submitted is complete. Preservation staff will review the material and prepare a response assessing whether the property appears eligible for the NR and/or CR. The Department will issue an HRA letter to the applicant within 60 days. Revising or submitting new materials may result in a restart of the 60-day review period. In some cases, the assessment may indicate that additional information will be required as part of a formal determination pursuant to CEQA, upon submittal of a Project Application.

WHO MAY APPLY FOR AN HISTORIC RESOURCE ASSESSMENT?

Any property owner or authorized agent of a property owner may file an HRA application.

Do not submit an application for an HRA if your property is currently identified as Category A (Known Historic Resource) or Category C (determined to NOT be a historic resource) in the Preservation tab on the Department's Property Information Map (<http://propertymap.sfplanning.org/>), or if there is an active Project Application for development or alterations currently under review by the Department.

For questions related to the Historic Resource Assessment process, please contact the Planning Department at

WHAT TO SUBMIT:

1. One completed copy of this application, providing all required information;
2. All property history documentation, including copies of building permits and drawings, historic maps, and articles (if available);
3. Current photograph(s) of the subject property, adjacent properties, and the surrounding block faces;
4. A Letter of Authorization from the owner(s) designating an authorized agent to communicate with the Planning Department on their behalf, if applicable;
5. A credit card or check made payable to the “San Francisco Planning Department” for the required application fee.

HOW TO SUBMIT

HRA applications must be submitted electronically via CPC.Intake@sfgov.org, with the required materials listed above.

FEE

Please refer to the Planning Department’s Fee Schedule available at www.sfplanning.org or at the Planning Information Center (PIC) located at 1660 Mission Street, First Floor, San Francisco. For questions related to the Fee Schedule, please call the PIC at 415.558.6377.

The fee for an HRA will be the same as for a Project Review Meeting during the pilot period. Note that the “Planning Department Only” fee amount will apply, and vary depending on whether there are more or fewer than 5 dwelling units in the existing structures on the property. Should the cost of staff time exceed the initial fee paid, an additional fee for time and materials may be billed upon completion of the HRA process.

Once your application has been submitted, the Department will contact you to collect payment before review of the application will commence.

HOW TO RESEARCH A PROPERTY'S HISTORY

Below is an outline of items that should be researched along with local resources available to the public. Please be aware that the address or block/lot may have changed from the date of construction, so be sure to have all available addresses, block/lot before beginning research.

- A. **Building Permit History.** Start with a search for the full construction and permit history. The Department of Building Inspection (DBI) has copies of all building permits issued, often accompanied by architectural drawings. The original construction permit can tell when a property was built and what its original appearance was. Requests for permit history must be made in person at DBI, 1660 Mission Street, at the Customer Service Division. Please refer to <http://www.sfdbi.org/> for more information.
- B. **Water Department Records.** Now a part of the Public Utilities Commission, the original SF Water Department's records can indicate when a building was constructed if the original building permits are not available. These records show when a property was 'tapped' into the City's main water system, which typically occurred close to the construction date. These records should be investigated for any property that was constructed prior to 1906. The Water Department Records are available at the Main Branch of the San Francisco Public Library located at 100 Larkin Street.
- C. **Assessor-Recorder's Office.** Used when researching the ownership history of a property, the Assessor-Recorder's Office has original deeds, sales records, and map books that show ownership history, records about owners, room counts, and building construction dates. Other data available at the Assessor-Recorder's Office include Map Books and Homestead Maps, both of which should be consulted for properties constructed prior to 1912, as well as photographs of the properties taken by the Assessor's Office in the 1950s through 1980s. Research must be done in person at the Assessor-Recorder's Office located in City Hall, Room #190. For more information about the Assessor-Recorder's Office and the material located there, refer to <http://www.sfassessor.org>.
- D. **San Francisco History Room.** Located at the Main Branch of the Public Library, the San Francisco History Room has extensive records that are helpful when researching the history of an owner/occupant(s) of a property, the history of a neighborhood, and information on an architect or builder. The San Francisco Historical Photograph Collection is located within the History Room and may provide an early view of a building or street. The collection in the History Room is where historic newspapers, such as the Chronicle and the Examiner, can be researched, along with Our Society Blue Books, and various real estate circulars. The Library also publishes "How to Research a San Francisco Building" that lists all resources available as well as steps to take when researching a property. The Main Branch of the San Francisco Public Library is located at 100 Larkin Street and additional information on the SF History Room is available on the library's website. Please refer to <http://www.sfpl.org/>.
- E. **Other Data at the Main Branch of San Francisco Public Library.** There are two additional resources that should be consulted when researching a property's history - the City Directories and U.S. Census Records. These resources are useful for documenting a building's occupant history. For information on researching census records, refer to the Government Information Center division of the Library; the City Directories are a part of the General Collection. The Main Branch of the San Francisco Public Library is located at 100 Larkin Street and additional information on both Library sections are available on the library's website. Please refer to <http://www.sfpl.org/>.
- F. **Other Research Collections.** There are several other resources available for researching a property's history.
- The California Historical Society houses extensive collections of historic photographs, histories of peoples and neighborhoods in San Francisco. For more information about the Society and their library hours, please refer to <http://www.californiahistoricalsociety.org>.
 - The Environmental Design Library at UC Berkeley is one of the premier repositories for architecture, landscape architecture, regional and urban planning materials in the country. The collections include periodicals such as Architectural Record and Architect & Engineer, original architectural drawings by premier architects, and rare books. For more information on the Library and its hours, please refer to <http://www.lib.berkeley.edu/ENVI/>.
 - San Francisco Architectural Heritage is a local organization whose mission is "to preserve and enhance San Francisco's unique architectural and cultural identity." SF Heritage has a library collection that focuses on historic buildings and includes a variety of material including newspaper articles and architect biographies. For more information about SF Heritage, please refer to <http://www.sfheritage.org/>.



San Francisco Planning

HISTORIC RESOURCE ASSESSMENT

(HRA) APPLICATION

Applicant Information

Name
Address
Email Address
Telephone
Property Owners Name

Property Information

Project Address: _____ Block/Lot(s): _____

Date of Construction: _____ Architect or Builder: _____

Is property included in a historic survey? _____ Survey Name: _____ Survey Rating: _____
 Yes No

Zoning District: _____ Height and Bulk Districts: _____

How many units does the subject property have? _____

Previously contacted Planning Department staff: _____

Property/Architecture Photographs

Attach photographs of the building and property, including the rear and side facades.

Adjacent Properties/Neighborhood Photographs

Attach photographs of all properties on the same side of the block as the subject property as well as the properties immediately opposite the subject property.

Alteration(s) and Permit History

Please provide photocopies of each building permit issued from date of construction to present for subject property.

Please describe any additional projects or alterations that are not included in building permit records and identify the date of these changes to the building, if known.

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DRAFT

Ownership History Table

Please list out all owners of the property from the date of construction to present

Owner:	Date (to-from):	Name(s):	Occupation:
1			
2			
3			
4			
5			
6			
7			
8			

Please describe any additional owners or information about a particular owner(s) that is not included in this table:
See attachment (if more space is needed)

Occupant History Table

Please list out all occupants/tenants of the property from the date of construction to present.

Occup.	Date (to-from):	Name(s):	Occupation:
1			
2			
3			
4			
5			
6			
7			
8			

Please describe any additional occupants or information about a particular occupant(s) that is not included in this table:
See attachment (if more space is needed)

APPLICANT'S AFFIDAVIT

Under penalty of perjury the following declarations are made:

- a) The undersigned is the owner or authorized agent of the owner of this property.
- b) The information presented is true and correct to the best of my knowledge.
- c) Other information or applications may be required.

Signature Name (Printed)

Relationship to Project Phone Email

(i.e. Owner, Architect, etc.)

APPLICANT'S SITE VISIT CONSENT FORM

Planning Department staff will conduct an initial site visit that will assess the property from the public right-of-way. If additional information is necessary, staff will contact the property owner to authorize access to the property. The following indicates that the property owner is aware that the City and County of San Francisco Planning staff will conduct a site visit of this property from the public right-of-way and may require additional access. Should additional access to the property be required, the property owner agrees to make all portions of the interior and exterior accessible.

Signature Name (Printed)

Date

For Department Use Only

Application received by Planning Department:

By: _____

Date: _____



December 6, 2018

**COMMENTS & SUGGESTIONS RE:
HISTORIC RESOURCE ASSESSMENT (HRA) PILOT PROGRAM**

As you can imagine, I am delighted to see the HRA process initiated next year as a pilot program. This was the highest priority of the Public Policy and Advocacy (PPAC) and Small Firms Committees (SFC) of the AIA SF. Thank you - We've been working together three years to get here.

We recognize and applaud you also for other changes we have requested that have been fully or partially implemented:

- An historic preservation planner is now available at PIC full-time.
- A CEQA Categorical Exemption Checklist has been implemented avoiding a lengthy and costly process for some projects.
- Additional professionally trained preservation planners and architects have been hired by the Dept.
- The Dept. is beginning public outreach on SF Interpretations of the Sec. of Interiors Standards.
- The Dept. is beginning implementation of a Citywide Historic Survey.
- Potential Historic Districts are available online now, if one knows where to look for them.

Since we did not meet last week, and the presentation to the Historic Preservation Commission is scheduled for December 19th, I'll give you some preliminary feedback now:

- The launch of the HRA Pilot Program (as well as the Citywide Historic Survey) brings up the question of the criteria that will be used to determine if a building is a Historic Resource (HR). It is not sufficient to just refer to the National Register and California Register. Residents, owners, neighborhood groups, architects, builders, and designers all need to know the details of how you will judge whether or not a building is an HR. For example, what is the Dept. stance on these example situations:
 - A building is greater than 45 years old, is of an identifiable historic style, and has its character defining elements intact, but is an unremarkable, not a stellar example of a style that is prevalent in the City, i.e. an Edwardian, a Queen Ann Victorian, an Italianate Victorian. When is a house significant enough architecturally to warrant HR status?

- A recognized master architect designed the house, but it is not a notable example, an exemplary design, a master work of this architect. Or it is a design direction that is unusual for the master architect, outside the style they are noted for, but not a very noteworthy or important work.
 - A noted person lived at the house for a period of time, but no historically significant events or actions in his or her life occurred there.
- Will buildings be reclassified as a Category A or C as a result of this process, with the proviso that the Citywide Survey or additional information might result in reclassification?
- Designation of a building as an HR, places significant restraints on owners with few of the benefits, nor designation safeguards of a SF Landmark under Article 10 of the Code. A process to allow appeal from an internal Dept. designation of HR should be implemented, as has been with RDAT, and this should apply to existing Category A buildings as well, as many owners may not even be aware of the status of their A building.
- The Dept. also needs to address the process, and criteria, for designation of Potential Historic Districts and contributory buildings within that district – this is currently a mysterious process that happens totally behind closed doors.
- Consider enacting a policy, that if an A building is not made a Landmark or contributory building to a Landmark District under Chapters 10&11 of the Planning Code, or made a CR or NR listed building within some period of time (3 years?) it is reclassified as a Category C building.
- Charging a fee equivalent to that for a Project Review of \$455 is a major improvement over charging for a Phase 1 determination of HR status.
- A targeted 60 day turnaround time is also a major step forward.
- Electronic submittal of the application and supporting information is a welcome improvement.
- A clear, concise checklist of the type of historic information you require in the application, separate from “How to Research a Property’s History” should be drawn up.
 - Is it the same as required for a Supplemental Information form? Need one use all the resources listed in “How to Research....”?
 - Does a 3-R report need to be obtained to document permits that might not be in the DBI or DCP databases?
- Your “Applicant’s Site Visit Consent Form” requires access to the interior, as well as exterior, of buildings. As I understand it, if the building is not publically accessible, as is the case with most, if not all, residential buildings, access to the interior shouldn’t be

necessary in determining its historic status. Instead of scaring owners off, you might want to make this clear.

Please let us know if and when information on the HRA can be shared with the Small Firms Committee, as they have been involved in the process also, and would be highly interested in what is proposed. Am I correct in assuming public comments will not be allowed at the informational presentation to the Historic Preservation Commission on December 19th?

Again, thanks for your effort and thoughtfulness in implementing the HRA. I hope these comments and suggestions will be helpful in reviewing your proposed policies.

We also look forward to learning of your reactions and initiatives undertaken in response to our other suggestions in my memo of 1/12/16 (revised 2/12/18) which I've attached for easy reference.

Best,

David

David S. Gast, AIA
Principal
Member of the AIASF PPAC and SFC

December 11, 2018

COMMENTS & SUGGESTIONS

RE: HISTORIC RESOURCE ASSESSMENT (HRA) PILOT PROGRAM

The American Institute of Architects San Francisco (AIASF) is delighted to see the Historic Resource Assessment process initiated next year as a pilot program. This was the highest priority of the Public Policy and Advocacy (PPAC) and Small Firms Committees (SFC) of the AIASF. Thank you -- we've been working together three years to get here.

We recognize and applaud you also for other changes requested that have been fully or partially implemented:

- An historic preservation planner is now available at PIC full-time.
- A CEQA Categorical Exemption Checklist has been implemented, avoiding a lengthy and costly process for some projects.
- Additional professionally trained preservation planners and architects have been hired by Planning.
- Planning is beginning public outreach on SF Interpretations of the Secretary of Interiors Standards.
- The Department is beginning implementation of a Citywide Historic Survey.
- Potential Historic Districts are available online now, if one knows where to look for them.

Preliminary feedback on the pilot program is included herein:

- The launch of the HRA Pilot Program (as well as the Citywide Historic Survey) brings up the question of the criteria used to determine if a building is a Historic Resource (HR). It is not sufficient to refer to the National Register and California Register. Residents, owners, neighborhood groups, architects, builders, and designers all need clarity on how the Department will judge whether a building is an HR.
- Will buildings be reclassified as a Category "A" or "C" because of this process, with the proviso that the Citywide Survey or additional information might result in reclassification? We assume that is what is intended and suggest this be clearly stated.
- Designation of a building as an HR places significant restraint on owners with few of the benefits nor designation safeguards of a SF Landmark under Article 10 of the Code. Owners should be notified in writing of the classification of their building as a Historic Resource, an "A" building, with an explanation of what that means to them. Notification should also be given to owners of existing "A" buildings, many of whom may not know of the designation nor the consequences of being classified as a Historic Resource.
- A process to allow appeal from a Planning designation of a HR should be implemented, as has been implemented with RDATE decisions.
- The Department also should address the process and criteria for designation of Potential Historic Districts and contributory buildings within those districts.

- Planning should consider enacting a policy, stating that if an “A” building is not made a Landmark or contributory building to a Landmark District under Chapters 10 & 11 of the Planning Code, or made a California Register or National Register listed building within a period of time (3 years?) it is reclassified as a Category “C” building.
- Charging a fee of \$455 for the HRA, equivalent to that for a Project Review, is a major improvement over the fees charged for a Phase 1 determination of HR status.
- A targeted 60-day turnaround time is a major step forward.
- Electronic submittal of the application and supporting information is a welcome improvement.
- A clear, concise checklist of the type of historic information required in the application, in addition to “How to Research a Property’s History” should be drawn up.
- Your “Applicant’s Site Visit Consent Form” requires access to the interior, as well as exterior, of buildings, however if the building is not publicly accessible, as is the case with most, if not all, residential buildings, access to the interior shouldn’t be necessary in determining its historic status.

Again, thanks for your effort and thoughtfulness in implementing the HRA. We hope these comments and suggestions will be helpful in reviewing your proposed policies.