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RESPONSES TO COMMENTS

200-214 6th Street Affordable Housing with Ground-Floor Retail Project

PLANNING DEPARTMENT
CASE NO. 2011.0119E

STATE CLEARINGHOUSE
NO. 2012082052

Draft EIR Publication Date:	February 27, 2013
Draft EIR Public Hearing Date:	April 4, 2013
Draft EIR Public Comment Period:	February 27, 2013 – April 15, 2013
Final EIR Certification Hearing Date	August 1, 2013



SAN FRANCISCO
PLANNING
DEPARTMENT

ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT



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DATE: July 17, 2013

TO: Members of the Planning Commission and
Interested Parties

FROM: Sarah B. Jones, Acting Environmental Review Officer

Re: **Attached Responses to Comments on Draft Environmental
Impact Report Case No. 2011.0119E — 200-214 6th Street
Affordable Housing with Ground-Floor Retail Project**

Attached for your review please find a copy of the Responses to Comments for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on August 1, 2013. Please note that the public review period ended on April 15, 2013.**

The Planning Commission does not conduct a hearing to receive comments on the Responses to Comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to Commission members or to the President of the Commission at 1650 Mission Street and express an opinion on the Responses to Comments document, or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive a copy of the Responses to Comments document in addition to the Draft EIR, you technically have the Final EIR. If you have questions concerning the Responses to Comments document or the environmental review process, please contact Rachel Schuett, at (415) 575-9030.

Thank you for your interest in this project and your consideration of this matter.

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City and County of San Francisco
Planning Department

200-214 6th Street Affordable Housing with Ground-Floor Retail Project

RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

Planning Department Case No. 2011.0119E

State Clearinghouse No. 2012082052

DEIR Publication Date: February 27, 2013

DEIR Public Hearing Date: April 4, 2013

DEIR Public Comment Period: February 27 to April 15, 2013

Final EIR Certification Hearing Date: August 1, 2013

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200-214 6th Street Affordable Housing with Ground-Floor Retail Project

RESPONSES TO COMMENTS

TABLE OF CONTENTS

	<i>Page</i>
A. INTRODUCTION	RTC 1
A.1 Purpose of the Responses to Comments Document	RTC 1
A.2 Environmental Review Process	RTC 2
A.3 Document Organization.....	RTC 4
B. LIST OF PERSONS COMMENTING	RTC 7
C. COMMENTS AND RESPONSES	RTC 9
C.1. General Comments – [GC-1] and [GC-2].....	RTC 10
C.2 Cultural and Paleontological Resources – [CP-1] through [CP-4]	RTC 10
C.3 Alternatives – [AL-1] and [AL-2].....	RTC 16
D. DRAFT EIR REVISIONS	RTC 25

ATTACHMENTS

- Attachment 1 Comment Letters
- Attachment 2 Transcript of Public Hearing on the Draft EIR (April 4, 2013)
- Attachment 3 Building Design Compatibility Analysis

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A. INTRODUCTION

A.1 PURPOSE OF THE RESPONSES TO COMMENTS DOCUMENT

This document has been prepared to respond to comments received on the Draft Environmental Impact Report (DEIR) for the proposed 200-214 6th Street Affordable Housing with Ground-Floor Retail Project (proposed project). The DEIR identifies the likely environmental consequences associated with the implementation of the proposed project and recommends mitigation measures to reduce significant impacts. This Responses to Comments document provides a response to each comment received, and revises the DEIR, as necessary, to correct or clarify information.

None of the comments received provide new information that warrants recirculation of the DEIR. The comments do not identify new impacts that would result in a substantial increase in the severity of impacts and do not include feasible project alternatives or mitigation measures that are considerably different from those analyzed in the DEIR and/or that the project sponsor has previously refused to implement. A mitigation measure was added to augment a mitigation measure that was previously identified. Also, a project alternative was added and analyzed to include an intermediate scenario between the “No Project Alternative” and the “Preservation Alternative.”

The project sponsor has agreed to implement the new mitigation measure and the new alternative is within the range of alternatives analyzed in the DEIR.

This Responses to Comments document, together with the revised DEIR constitutes the Final EIR for the proposed 200-214 6th Street Affordable Housing with Ground-Floor Retail Project.

A.2 ENVIRONMENTAL REVIEW PROCESS

An environmental evaluation application (EE application) was submitted to the Planning Department on January 24, 2011.¹ The filing of the EE application initiated the environmental review process as outlined below.

NOTICE OF PREPARATION AND PUBLIC SCOPING

As described in the DEIR, the San Francisco Planning Department distributed a Notice of Preparation of an Environmental Impact Report and an Initial Study (NOP/IS) on August 15, 2012, announcing the intent to prepare and distribute an EIR. The NOP/IS was distributed to property owners within 300 feet of the project site, tenants adjacent to the project site, governmental agencies, neighborhood and City-wide organizations, and other persons/organizations with interest in the proposed project. The NOP and Initial Study are included as Appendix A in the DEIR.

In response to the NOP members of the public submitted comment letters to the Planning Department, which included the following concerns: construction-related noise and vibration, dust and traffic.

DRAFT EIR PUBLIC REVIEW

The San Francisco Planning Department prepared the Draft EIR for the 200-214 6th Street Affordable Housing with Ground-Floor Retail Project in accordance with CEQA and the *CEQA Guidelines* in Title 14 of the California Code of Regulations as well as Chapter 31 of the *San Francisco Administrative Code* (*Administrative Code*). The Draft EIR was published on February 27, 2013. The document was distributed to applicable local and State agencies, other interested parties, concerned property owners, individuals likely to be interested in the potential impacts of the proposed project, people who submitted comments during the NOP/IS public review comment period, and those individuals who requested a copy of the DEIR. Copies of the DEIR were also made available for public review during normal business hours at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California and at

¹ 200-214 6th Street Environmental Evaluation Application (EEA). This document is available for public review at the Planning Department, 1650 Mission Street Suite 400, San Francisco, as part of Case No. 2011.0119E.

the Planning Information Center at 1660 Mission Street, First Floor, San Francisco, CA 94105. The DEIR was also posted for public review at <http://tinyurl.com/sfceqadocs>.

A Notice of Availability (NOA) of the DEIR was posted on the Planning Department website, sent to interested and nearby property owners, and posted at the project site and in the project site vicinity. Copies of the NOA were mailed to all individuals previously requesting to be notified of the DEIR, in addition to those agencies and individuals who received a copy of the NOP/IS.

The public comment period for the DEIR ended on April 15, 2013. The San Francisco Planning Department held a public hearing on April 4, 2013 to accept comments on the DEIR. Copies of all written comments received during the comment period are included in Attachment 1, Comment Letters. A transcript of oral comments provided by the Planning Commission and members of the public during the public hearing is included in Attachment 2, Transcript of the Public Hearing on the Draft EIR.

RESPONSES TO COMMENTS DOCUMENT AND FINAL EIR

The comments received during the public review period are the subject of this Responses to Comments document, which addresses all substantive written and oral comments on the DEIR.

The San Francisco Planning Department distributed this Responses to Comments document for review to the San Francisco Planning Commission as well as to the persons who commented on the DEIR. The Planning Commission will consider the adequacy of the Final EIR – consisting of the DEIR and the Responses to Comments document – in complying with the requirements of CEQA. If the Planning Department finds that the Final EIR complies with CEQA requirements, it will certify the Final EIR and will then consider the associated Mitigation, Monitoring, and Reporting Program (MMRP), and the Conditional Use Authorization for the proposed project.

Consistent with *CEQA Guidelines* Section 15097, the MMRP is designed to ensure the implementation of the mitigation measures identified in the Final EIR and adopted by decision-makers to mitigate or avoid the project's significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (*CEQA Guidelines* Sections 15091 and 15092). Since the EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels, the findings include a Statement of Overriding Consideration for

those impacts (*CEQA Guidelines* Section 15093[b]). The project sponsor will be required to implement the mitigation measures as conditions of project approval.

A.3 DOCUMENT ORGANIZATION

The Responses to Comments document consists of the following chapter:

- **Chapter A: Introduction.** This chapter discusses the purpose and organization of this Responses to Comments document and summarizes the environmental review process for the project.
- **Chapter B: List of Persons Commenting.** This chapter contains a list of individuals who submitted written comments on the DEIR during the public review period and/or provided oral testimony at the public hearing.
- **Chapter C: Comments and Responses.** This chapter contains responses to all substantive written and oral comments received on the DEIR. The responses have been organized by topic in the order of topics presented in the DEIR and have been assigned an alphanumeric code by subtopic as follows:
 1. General Comments — [GC-1] and [GC-2]
 2. Cultural and Paleontological Resources — [CP-1] through [CP-4]
 3. Alternatives — [AL-1] and [AL-2]

Attachment 1 to this Responses to Comments document presents copies of the bracketed written comments from which the excerpts are derived. Written comment letters, emails, and facsimiles are organized alphabetically by agency, board or commission, organization, and individual, and assigned an alphabetic designation (see Chapter B, List of Persons Commenting). Attachment 2 presents the bracketed transcript of the oral testimony received at the public hearing on the Draft EIR from which the transcript comments are derived.

Following each comment or group of comments is the Planning Department's response. Similar comments are grouped together by topic and may be addressed by a single response. The responses generally provide clarification of information presented in the Draft EIR. The responses may also include revisions or additions to the Draft EIR. Revisions to EIR text are shown as indented text. New or revised text is double-underlined, and deleted material is shown as ~~striketrough~~ text. The subject matter of one topic may overlap with that of other topics, so the

reader must occasionally refer to more than one group of comments and responses to review all the information on a given subject. Cross-references are provided in these instances.

Chapter D: Draft EIR Revisions. This chapter presents text changes to the Draft EIR initiated by San Francisco Planning Department staff to supplement and clarify the DEIR text in response to comments received. Text with double underline represents language that has been added to the DEIR, text with strikethrough has been deleted from the DEIR.

These changes have not resulted in significant new information with respect to the Draft EIR's environmental analysis and do not identify any new significant unmitigated environmental impacts, from the proposed project, or from new mitigation measures that are not included as part of the Draft EIR. Therefore, recirculation of the Draft EIR pursuant to *CEQA Guidelines* Section 15088.5 is not required.

This Responses to Comments document will be incorporated in the Final EIR as a new chapter. The changes to the Draft EIR's text and figures called out in the responses and Chapter D, Draft EIR Revisions will be incorporated into the Final EIR.

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B. LIST OF PERSONS COMMENTING

The following individuals submitted written comments during the public comment period February 27 through April 15, 2013, and/or provided oral testimony at the public hearing on April 4, 2013, on the 200-214 6th Street Affordable Housing with Ground-Floor Retail Project Draft EIR. Each letter or email received is assigned an alphabetical designation (in this case, Comment Letter A and Comment Letter B). The alphanumeric designation in brackets assigns a topic code based on the content of the comment, as identified in Section A.3 of this document (e.g., Responses [AL-1] and [AL-2] address Comments [AL-1] and [AL-2] regarding project alternatives). Chapter C, Comments and Responses, address the comments contained therein as well as in the public hearing testimony.

PERSON/AGENCY OR GROUP AND SIGNATORY	DATE	FORMAT, [RESPONSE KEY]
Boards and Commissions		
<i>Planning Commission</i>		
Michael Antonini, Planning Commissioner	April 4, 2013	Public hearing comments, [GC-2], [AL-1], [AL-2]
Hisashi Sugaya, Planning Commissioner	April 4, 2013	Public hearing comments, [GC-1], [CP-1], [CP-2], [CP-3]
Hisashi Sugaya, Planning Commissioner	April 14, 2013	Comment Letter A, [CP-1], [CP-3]
<i>Historic Preservation Commission</i>		
Historic Preservation Commission	April 11, 2013	Comment Letter B, [AL-1], [AL-2], [CP-4]

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C. COMMENTS AND RESPONSES

All comments received are presented herein by direct quotation.

Comments and responses are organized according to the order of topic areas as they appear in the Draft EIR and Initial Study.

Each comment is numbered and followed by a corresponding numbered response. The name of the commenter follows each comment in italic font and parentheses, along with the location of the original comment in Attachments 1 or 2, and the location of the verbiage within the original comment source; e.g., (*John Smith, Comment Letter A, 1st comment*) or (*Mary Johnson, public hearing testimony, 2nd comment*). In some cases, comments that are substantively similar have been grouped and addressed with a single response, or in other cases comments from individual commenters may be divided among several topic areas.

C.1 GENERAL COMMENTS

Comment [GC-1] – Timing of Historic Preservation Commission Hearing

“I have a quick question to staff about the date of the HPC hearing in which they considered this.”
(*Hisashi Sugaya, Planning Commissioner, public hearing testimony, 1st comment*)

Response [GC-1] – Timing of Historic Preservation Commission Hearing

This is not a comment on the adequacy of the Draft EIR. As stated by department staff at the Planning Commission hearing, the Historic Preservation Commission reviewed the DEIR on March 6, 2013 and again on March 20, 2013. It should also be noted that the HPC's comments were incorporated into Comment Letter B (dated April 11, 2013).

Comment [GC-2] – Adequacy of the Draft EIR

“I think the EIR seems to be—at least the draft—it seems to contain the things it needs to contain.”
(*Michael Antonini, Planning Commissioner, public hearing testimony, 5th comment*)

Response [GC-2] – Adequacy of the Draft EIR

This comment generally acknowledges the adequacy of the Draft EIR. No response is required.

C.2 CULTURAL AND PALEONTOLOGICAL RESOURCES

Comment [CP-1] – Potential for Mitigation of Building Demolition

“1. Historic Resources. Add a mitigation measure requiring the preparation of an exhibit/interpretive program about the building and the exterior artwork. Consideration should be given to having an interpretive exhibit on the exterior of the building visible to anyone passing on the sidewalk and a more detailed exhibit/interpretive program in the building lobby or other publically accessible space. The interpretive program can draw from the work already prepared for the DEIR and the HABS Documentation.” (*Hisashi Sugaya, Planning Commissioner, Comment Letter A, 1st comment*)

“I'll be submitting comments separately. They have to do mainly with mitigation measures on the historic resources. I think you need to augment them a bit. I'll just go ahead and say one thing. I think, since the art piece is considered to be somewhat important or recognized as such, I think that the mitigation should include some kind of treatment of that particular art piece. I know that the artist is around, since it was carried in the paper yesterday or today. So information is available. And if that could be incorporated into some kind of exhibit, perhaps.” (*Hisashi Sugaya, Planning Commissioner, public hearing testimony, 3rd comment*)

Response [CP-1] – Potential for Mitigation of Building Demolition

This is not a comment on the adequacy of the Draft EIR, it is a request to augment the HABS documentation to include the Defenestration art installation. It should be noted that the Defenestration art installation is not considered an historic resource and the removal of the art installation would not result in an impact, and therefore, under CEQA no mitigation is required. Further, the enhanced HABS documentation would not reduce severity of the impact associated with the demolition of the existing building, therefore the addition of this enhanced mitigation would not change the CEQA findings in the Draft EIR. However, in response to Comment CP-1, the DEIR has been amended to add a mitigation measure for a publically-accessible exhibit/interpretative program. These staff-initiated changes are located on page RTC 33 of this document, the new mitigation measure is as follows:

*Mitigation Measure M-CP-4b (Interpretative Display)***Completing a historical resources survey to HABS documentation standards would reduce the Impact CP-4, but not to a less-than-significant level. (Significant, Unavoidable)**

Implementation of this mitigation measure would reduce Impact CP-4 (historic architectural resources), but not to a less-than-significant level. Therefore, impacts related to the demolition of the 200-214 6th Street building would remain significant and unavoidable. However, to partially offset the loss of the resource, the project sponsor shall incorporate an exhibit/interpretative display on the history of the building, the Defenestration art installation, and the surrounding historic district prior to approval of the demolition permit. It should be noted that the Defenestration art installation is included in the exhibit/interpretive display although the art installation, itself, is not an historic resource. The documentation and interpretive display shall be designed by a qualified professional who meets the standards for history or architectural history (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). Planning Department Preservation staff shall review and approve the scope, content, design and location of the new exhibit/interpretative display. The new exhibit/interpretative display shall be located within a publicly-accessible or publicly viewable area within the new buildings, as determined by Planning Department Preservation staff and the Environmental Review Officer.

Mitigation Measure M-CP-4b augments other measures to document the existing building prior to demolition. The former San Francisco Redevelopment Agency's (SFRA) Project Advisory Committee requested that the project sponsor, Mercy Housing, place a high quality architectural photograph of the existing building in the proposed building's residential lobby. However, it should be noted that, for security reasons, the building's residential lobby would not be publicly-accessible; it would only be accessible to the building's tenants and guests.

Therefore, the project sponsor proposes to locate the exhibit/interpretive display in the building's publicly-accessible community room. The building's community room would be publicly accessible directly from Howard Street. Preliminary programming for the community room includes Family Resource Center parenting classes, held by the South of Market Childcare Center (SOMCC) in the evenings, as well as community meetings at other times. Given the lack of high quality, accessible community spaces in the 6th Street corridor, or surrounding South of Market neighborhood, the project sponsor anticipates that this community room would be well-used by the community.

Comment [CP-2] – Additional Mitigation of Historic Resource (Building) Demolition

“And, also, there probably should be an exhibit on the building or inside the lobby or somewhere with respect to the historic resource itself.” (*Hisashi Sugaya, Planning Commissioner, public hearing testimony, 3rd comment*)

Response [CP-2] – Additional Mitigation of Historic Resource (Building) Demolition

As stated in Response CP-1 a high quality architectural photograph would be featured in the residential lobby, however the lobby would not be publicly-accessible. Further, the remaining exterior area of the building would be predominantly storefront and/or utility and service areas such that opportunities for affixing an exhibit to the exterior of the building would be limited. Therefore, as discussed above, the project sponsor proposes to include the exhibit/interpretive display on the west wall of the community room such that it would be visible from the street.

Comment [CP-3] – HABS Documentation Technical Questions

“And I have some other technical things with respect to the photography that's being requested. So I will just submit those in writing.” (*Hisashi Sugaya, Planning Commissioner, public hearing testimony, 4th comment*)

“2. HABS-Level Photography. ‘Large format negatives are not required.’ Is this intended to mean that digital photography is allowable? If so, the digital sensor size should be at least full frame (35mm) with a minimum of 24 megapixels taken with a perspective correction or other lens resulting in photographs that do not require post-processing in Lightroom, Photoshop, Aperture, DxO Optics, or other program. Photographic prints should be accompanied by a data sheet from the printer noting the paper used, printer model, type of ink, and estimated longevity.” (*Hisashi Sugaya, Planning Commissioner, Comment Letter A, 2nd comment*)

Response [CP-3] – HABS Documentation Technical Questions

This is not a comment on the adequacy of the Draft EIR, the commenter seeks clarification on the details of HABS-Level Photography requirements. In response to Comment CP-3, Mitigation Measure M-CP-4, which describes the requirements for HABS Documentation has been revised for clarity. This mitigation measure is now referred to as M-CP-4a with the insertion of Mitigation Measure M-CP-4b (see Response to CP-1, above). These staff-initiated changes are located on pages RTC 31-RTC 32 of this document, the revised mitigation measure is as follows:

*Mitigation Measure M-CP-4a (HABS Documentation)***Completing a historical resources survey to HABS documentation standards would reduce the Impact CP-4, but not to a less-than-significant level. (Significant, Unavoidable)**

Implementation of this mitigation measure would reduce Impact CP-4 (historic architectural resources), but not to a less-than-significant level. Therefore, impacts related to the demolition of the 200-214 6th Street building would remain significant and unavoidable. However, to partially offset ~~partially~~ the loss of the resource building, the project sponsor shall at a minimum, ensure that a complete survey meeting the standards of the Historic American Building Survey (HABS) is undertaken prior to demolition, as follows:

- Prior to approval of the demolition permit, the Project Sponsor shall undertake HABS (Historic American Building Survey) documentation of the subject property. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61).

The documentation shall consist of the following:

- *HABS-Level Photography:* Archival photographs of the interior and the exterior of subject property. Large format negatives are not required. Digital photography may be taken, as guided by HABS/HAER/HALS Photography Guidelines. Generally, the following requirements shall apply: the digital sensor size should be at least full frame (35mm) with a minimum of 24 megapixels taken with a perspective correction or other lens resulting in photographs that do not require post-processing. Photographic prints should be accompanied by a data sheet from the printer noting the paper used, printer model, type of ink, and estimated longevity. The scope and number of the archival photographs shall be reviewed and approved by Planning Department Preservation staff ~~for concurrence~~, and all photography shall be conducted according to the latest National Park Service standards and guidelines ~~Standards~~. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS Photography, and shall ~~must~~ be labeled according to HABS Photography Guidelines ~~Standards~~; and,

- *HABS Historical Report*: A written historical narrative and report, per HABS Historical Report Guidelines.

The professional shall prepare the documentation and submit it for review and approval by the San Francisco Planning Department's Preservation Technical Specialist. The final documentation shall be disseminated to the San Francisco Planning Department, San Francisco Library History Room, Northwest Information Center-California Historical Resource Information System, and San Francisco Architectural Heritage.

Comment [CP-4] – Compatibility with the Historic District

"NEW CONSTRUCTION - The Commission expressed support for the overall project, but noted that the design of the new construction does not appear to be compatible with the surrounding National-Register eligible historic district. Specifically, the new construction should draw from the adjacent historic buildings, and incorporate elements, including cornice lines, in order to reinforce the building's compatibility within the historic district. The Commission finds that the design of the project pursuant to the Secretary of the Interior's Standards for Rehabilitation could be refined to better demonstrate the project's compatibility with the surrounding eligible historic district." (*Historic Preservation Commission, Comment Letter B, 3rd comment*)

Response [CP-4] – Compatibility with the Historic District

It should be noted that the plans, elevations and visual simulations included in the project description of the Draft EIR (Figures 4 – 15 on pages 40-51 and Figures 17-18 on pages 55-56, respectively) featured a prior iteration of the building design, which was also included in the Initial Study for the proposed project. The project architects Kennerly Architecture & Planning and Saida-Sullivan Design Partners have included additional visual simulations as well as building elevations from Howard Street and from Sixth Street, which depict the current building design proposal. These are included in Attachment 3 to this document.

As determined in the Department's *Historic Resource Evaluation Response: 200-214 6th Street* (dated January 18, 2012), the new construction is generally compatible with the historic character of the surrounding historic district and would result in a less-than-significant impact upon a historic resource. This determination was based largely on the fact that the new construction draws from the adjacent historic buildings and incorporates elements from the surrounding historic district. Department staff reached this conclusion after evaluating the proposed project according to the Secretary of the Interior's Standards for Rehabilitation. Specifically, the *Historic Resource Evaluation Response* states:

The proposed project is compatible with the surrounding potential historic district and does provide reference to a number of the district's character-defining features. The proposed project provides a shaped corner as defined by the nine-story mass, which is subsequently scaled down to eight-stories along 6th Street to better relate to the adjacent properties within the potential historic district, which are primarily three-to-five-stories tall. The district does possess a number of taller six- and seven-story buildings. At the ground floor level, the project maintains the consistent line of tall commercial storefronts, which are characteristic of 6th Street. To relate to the warm-tone masonry and prominent cornice lines within the district, the project provides a simple, projecting concrete cornice over each mass, and will use a brick masonry veneer on the exterior.

While it is clear that the proposed project is differentiated, the design of the exterior does reference the character-defining features, thus provides compatibility with the surrounding historic district. The Department recognizes the contemporary infill design of the proposed project, as related to the potential historic district, and does find it to be on balance compliant with Rehabilitation Standard #9 and the other Rehabilitation Standards.

As stated above, to supplement this analysis, the project architects have prepared additional renderings and visual simulations which are included in Attachment 3 to this document. Also included in Attachment 3 is a narrative, which focuses upon the compatibility of the new construction with the surrounding 6th Street Lodginghouse Historic District. This narrative documents the history of the building design, and how it has evolved in response to information contained in the *Historic Resource Evaluation Response*, and in response to comments received from the Architectural Review Committee (ARC) of the Historic Preservation Commission (HPC).

The Planning Department concurs that the proposed project aligns to the surrounding historic district given its use (affordable housing over retail), continuous retail street frontage, varied building height, massing, material, texture, fenestration and architectural details. More specifically, the proposed project creates two simple rectangular volumes of different heights, which are consistent with the size, scale and proportion of the surrounding district, as evidenced by the more prominent corner and smaller mass along 6th Street. Finally, the proposed project incorporates a brick veneer, deeply recessed windows, and an articulated cornice, which are dominant characteristics of the eligible historic district. In particular, the proposed project's deeply recessed windows reference a characteristic found within the surrounding eligible historic district, as evidenced by the deeply set, wood sash windows found within many of the district's

masonry buildings. A photo montage which illustrates the building massing, fenestration patterns, and architectural finishes on other contributing structures to the 6th Street Lodginghouse District is also included, for reference, in Attachment 3.

Planning Department staff is in agreement with this analysis and the conclusions included within the DEIR. Overall, the proposed project has been determined to be compatible infill construction within an eligible historic district, which would result in a less-than-significant impact upon adjacent historic resources.

C.3 ALTERNATIVES

Comment [AL-1] – Partial Preservation Alternative

“ALTERNATIVES - The Commission commented on the preservation alternative and questioned whether a partial preservation alternative could also be evaluated that utilizes the maximum allowed height and bulk for the project site.” (*Historic Preservation Commission, Comment Letter B, 1st comment*)

“And, of course, the partial preservation option was discussed, which might be something I would be in favor of. But that's a discussion to have at the time the project comes forward.” (*Michael Antonini, Planning Commissioner, public hearing testimony, 6th comment*)

Response [AL-1] – Partial Preservation Alternative

This is not a comment on the adequacy of the Draft EIR since the Draft EIR examined a range of alternatives from the No Project Alternative to the Full Preservation Alternative, and no alternative was identified that would mitigate the significant unavoidable impact to the historic district to a less than significant level. However, although it is not required under CEQA, in response to Comment AL-1, the DEIR has been amended to include a partial preservation alternative, Alternative C. These staff-initiated changes are located on pages RTC 42-RTC 52 of this document. The added text is as follows:

C. ALTERNATIVE C: PARTIAL PRESERVATION ALTERNATIVE

DESCRIPTION

Alternative C, the Partial Preservation Alternative, would not demolish the existing 200-214 6th Street building, but would retain and preserve the building's exterior shell, while accommodating as much of the proposed project's program as possible. The floor plans for the Partial Preservation Alternative are included in Figures 22 through 26 on pages 105B through 105F. The existing street-facing masonry walls would be reinforced, retained in place through construction, and adapted as the exterior shell including new windows and necessary upgrades for insulation, fire-protection, water-proofing, and noise reduction (to meet Title 24 interior standards).

The Partial Preservation Alternative would also construct a four-story vertical addition which fills out the maximum allowable zoning envelope to the height limit of 85-feet at the roof and built out to both street fronting property lines. As shown in Figures 27 and 28 on pages 105G and 105H, the proposed massing for the Partial Preservation Alternative would have three parts: the existing building envelope on the first through fourth floors, a small setback on the fifth and sixth floors to allow for light and air behind the existing tall parapet, and the seventh and eighth floors built out to the property line to maximize floor area.

The new additions to the building would be distinct in architectural character from the existing building, and the setback on the fifth and sixth floors would help to further distinguish the old from the new, consistent with the Secretary of the Interior's Standards for Rehabilitation.

The program for this alternative is constrained by two factors: (1) the existing floor-to-floor heights, which effectively eliminate an entire floor to fit within the 85-foot height limit, and (2) the tall parapet on the existing building which requires a small setback at the fifth and six floors to allow light and air for the dwelling units on these floors. The result is that this alternative would have a reduced floor area compared with the proposed project even though the building envelope is maximized. The resulting program areas would be proportionate in terms of size and similar in quality to the proposed project. This alternative would accommodate more dwelling units than the full Preservation Alternative, but fewer dwelling units than the proposed project.

Given the physical constraints, the Partial Preservation Alternative would include a total of 52 dwelling units (eight three-bedroom, 18 two-bedroom, 22 one-bedroom and four studios), and 1,810 square feet of ground-floor retail/commercial space, compared to the proposed project's 67 dwelling units, and approximately 2,845 square feet of ground-floor retail/commercial space. The Partial Preservation Alternative would also include a 1,250-square-foot community room, but would not include on-site parking the same as under the proposed project.

The usable open space would be consistent with that in the proposed project design including a ground floor yard open to the community room, some private residential patios at the setback fifth floor and a common roof deck serving all residents. The common space would be consistent and proportional, laundry rooms and internal corridors would have windows to the outside and daylight, respectively. The community room would face onto the street and the rear yard. The retail space would line 6th Street within the existing abandoned retail bays, and building services would be clustered at the south end, similar to the proposed project.

Like the proposed project, the Partial Preservation Alternative would require findings of *General Plan* and Priority Policies consistency, conditional use authorization for construction on a site equal to or exceeding 10,000 square feet and establishment of a possible full service restaurant, building permits, permits for any curb or road modifications, and EIR certification. Unlike the proposed project, the Preservation Alternative would not require discretionary review for demolition of a residential building or demolition permit approval, an open space variance, a dwelling unit exposure variance, or street and sidewalk permits.

IMPACTS

The Partial Preservation Alternative would not reduce the historic resource impact of the proposed project to a less-than-significant level, since the Partial Preservation Alternative would still have a significant impact upon the existing building and the surrounding historic district. The construction of a four-story vertical addition on the existing four-story masonry building does not meet the Secretary of the Interior's Standards for Rehabilitation, since the mass and bulk of the new addition would not be deferential to the mass and bulk of the existing building. As a result, although the existing building would not be demolished, the partially preserved building would have a significant impact on the historic district. Therefore, the Partial Preservation

Alternative would still result in a significant and unavoidable impact to historic resources on the project site.

Given that the Partial Preservation Alternative would result in a building of similar height and size to the proposed project, a similar foundation system would likely be employed. Therefore, the Partial Preservation Alternative would require similar excavation and grading, and likely the installation of soil cement columns (although possibly to a lesser depth than the proposed project). Therefore, this alternative would not avoid the proposed project's impact on archeological resources and human remains, which would be potentially significant but would be reduced to less-than-significant by mitigation measures identified in this EIR.

This alternative would have the same potentially significant interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, and hazardous materials impacts, that the Initial Study (Appendix A) and this EIR identify for the proposed project (see Table S-1, Summary of Impacts and Mitigation Measures, page 4). These potentially significant impacts would be reduced to a less-than-significant level after implementation of mitigation measures identified for the proposed project, which would also apply to this alternative. The Partial Preservation Alternative would have impacts similar to or reduced from the proposed project's less-than-significant impacts without mitigation as discussed in the Initial Study (Appendix A). These impacts are in the following areas: land use, aesthetics, population and housing, transportation, greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agriculture and forest resources.

The Partial Preservation Alternative would partially meet the project sponsor's objective to increase affordable housing opportunities in San Francisco, because this alternative would have 33 percent fewer residential units than the proposed project. However, this alternative would meet other objectives of the project sponsor to design a project that complements the existing urban character of the area, develop a project with minimal environmental disruption, and complete the project on schedule and within budget.

The Partial Preservation Alternative would meet the project sponsor's primary objective of maximizing affordable housing opportunities to a lesser degree than the proposed project and could potentially be financially prohibitive. This alternative would produce a project with 52

affordable residential units, compared to the 67-unit proposed project that would demolish the existing building and thereby create a significant impact on the 6SL historic district. However, the Partial Preservation Alternative would also result in a significant impact on the 6SL historic district given that the addition to the building does not meet the Secretary of the Interior's Standards for Rehabilitation.

Comment AL-2 – Preservation Alternative

“The Commission also commented on the level of information of the preservation alternative. Specifically, the Commission noted that the environmental document should contain floor plans and additional architectural information (i.e., dwelling unit mix, unit count, etc.) on the preservation alternative, in order to demonstrate whether or not the alternative fulfills the objectives and goals of the proposed project. Overall, the preservation alternative should be better developed to illustrate a viable reuse scheme.” (*Historic Preservation Commission, Comment Letter B, 2nd comment*)

“The idea of preserving the building, having the same mission the project sponsor feels the same kind of housing is appropriate, but it would be larger, units that would be more hospitable to tenancy. That might be a good option, but that's not for us to discuss today. We are only talking about whether or not the environmental piece is adequate.” (*Michael Antonini, Planning Commissioner, public hearing testimony, 7th comment*)

Response [AL-2] – Preservation Alternative

As stated on page 102 of the DEIR:

Alternative B, the Preservation Alternative, would not demolish the historical 200-214 6th Street building, but would retain it and restore it to the Secretary of Interior's Standards. This alternative would retain all character-defining features of the existing building, including all exterior elevations and rooflines visible from the public right of way. It would also feature a fifth-story addition set back 10 feet from the fourth story to minimize the visual effect on the historical resource. (See Figures 20 and 21 on pages 103 and 104 for elevations of this alternative.)

The approximately 55-foot-tall building would have a footprint similar to the proposed project. The Preservation Alternative would include a total of 33 dwelling units (six three-bedroom, 13 two-bedroom, nine one-bedroom and five studios) and 2,571 square feet of ground-floor retail space, compared to the proposed project's 67 dwelling units, and approximately 2,845 square feet of ground-floor commercial space, 1,215-square-foot community room, 2,589 square feet of private open space, and 3,691 square feet of common open space (respectively). Like proposed project, the Preservation Alternative would not include on-site parking. The only open space under the Preservation Alternative would

be the 10-foot-wide gated open space extant along the west side of the building.

In addition, in response to Comment AL-2 Planning Department staff has initiated changes to the discussion of Alternative B in the DEIR. Specifically, the discussion of Alternative B in the DEIR has been augmented to include floor plans as Figures 19A through 19D, on new DEIR pages 102A through 102D, the supplement the elevations provided from 6th Street and from Howard Street which were included in the DEIR as Figures 20 and 21. A revised discussion of the development of Alternative B has also been provided with the new figures. These staff-initiated changes are located on pages RTC 33-RTC 42 of this document.

The revised text is as follows:

B. ALTERNATIVE B: PRESERVATION ALTERNATIVE

DESCRIPTION

Alternative B, the Preservation Alternative, would not demolish the historical 200-214 6th Street building, but would retain it and restore it to the Secretary of Interior's Standards, while accommodating as much of the project sponsor's program as possible. The floor plans for the Preservation Alternative are included in Figures 19A through 19D on pages 102A-102D. This alternative would retain all character-defining features of the existing building, including all exterior elevations and rooflines visible from the public right of way. It would also ~~feature~~ include a fifth-story addition set back 10 7 feet 5 inches from the fourth story on Howard Street and 8 feet on 6th Street to minimize the visual effect on both the existing building and the historical resource district, topped with a roof deck to meet the Planning Code usable open space requirement. (See Figures 20 and 21 on pages 103 and 104 for elevations of this alternative.)

Under the Preservation Alternative, the street-facing masonry walls of the existing building would be reinforced, retained in place through construction, and adapted as the exterior shell including new windows and upgrades for insulation, fire-protection, water-proofing, and noise reduction (Title 24 Standards). Inside, the building's stairs and cores would be replaced, the light well would be filled in, and all new building systems, partitions, and finishes would be constructed.

The program for this alternative is limited by two constraints: (1) the number of stories that could be added to the existing building without causing a significant unavoidable impact on the historic district. The construction of a one-story vertical addition on the existing four-story masonry building meets the Secretary of the Interior's Standards for Rehabilitation, since the mass and bulk of the new addition would be deferential to the mass and bulk of the existing building, however no additional stories could be added, and (2) the layout of the existing windows which feature large and small sizes, which would drive the interior unit planning. As a result of these constraints, this alternative would have a reduced floor area compared with the proposed project. The resulting program areas would be proportionate in terms of size and similar in quality to the proposed project.

Given these constraints, the Preservation Alternative would result in a building that is The approximately ~~6155-foot-tall~~ building would have with a footprint similar to the proposed project. The Preservation Alternative would include a total of ~~323~~ dwelling units (six three-bedroom, ~~113~~ two-bedroom, ~~13~~ nine one-bedroom, and ~~two~~ five studios) and ~~2,571~~ 2,265 square feet of ground-floor retail space, compared to the proposed project's 67 dwelling units, and approximately 2,845 square feet of ground-floor commercial space. The Preservation Alternative would also have a 905 -square-foot community room, 400 square feet of private open space, and 3,380 square feet of common open space compared to the 1,215-square-foot community room, 2,589 square feet of private open space, and 3,691 square feet of common open space (respectively) under the proposed project. Like proposed project, the Preservation Alternative would not include on-site parking.

Usable ~~The only~~ open space under the Preservation Alternative would include a ground floor yard that opens to the community room, some private residential patios at the setback fifth floor, and a common roof deck serving all residents. ~~be the 10-foot-wide gated open space extant along the west side of the building.~~ The common space would be consistent with and proportional to the common space under the proposed project, laundry rooms and internal corridors would have windows to the outside and daylight, respectively. The community room would face onto the street and the rear yard. The retail space would line 6th Street within the existing abandoned retail bays, building services would be clustered at the south end, similar to the proposed project.

Like the proposed project, the Preservation Alternative would require findings of *General Plan* and Priority Policies consistency, conditional use authorization for construction on a site equal to or exceeding 10,000 square feet and establishment of a possible full service restaurant, building permits, permits for any curb or road modifications, and EIR certification. Unlike the proposed project, the Preservation Alternative would not require discretionary review for demolition of a residential building or demolition permit approval, an open space variance, a dwelling unit exposure variance, or street and sidewalk permits.

IMPACTS

The Preservation Alternative would avoid the proposed project's significant and unavoidable historic architectural resources impact identified in this EIR. ~~Given that the~~ The Preservation Alternative would likely not require foundation upgrades which could include excavation, grading, and/or the installation of soil cement columns, therefore, this alternative ~~could also avoid the proposed project's~~ result in an impact on archeological resources and human remains, which would be potentially significant but would be reduced to less-than-significant by mitigation measures identified in this EIR. This alternative would have the same potentially significant interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, and hazardous materials impacts, that the Initial Study (Appendix A) and this EIR identify (see Table S-1, Summary of Impacts and Mitigation Measures, page 4). These potentially significant impacts would be reduced to a less-than-significant level after implementation of mitigation measures identified for the proposed project, which would apply to this alternative. The Preservation Alternative would have impacts similar to or reduced from the proposed project's less-than-significant impacts without mitigation as discussed in the Initial Study (Appendix A). These impacts are in the following areas: land use, aesthetics, population and housing, transportation, greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agriculture and forest resources.

The Preservation Alternative would partially meet the project sponsor's objective to increase affordable housing opportunities in San Francisco, because this alternative would have about 50 percent fewer residential units than the proposed project. However, this alternative would meet other objectives of the project sponsor to design a project that complements the existing urban

character of the area, develop a project with minimal environmental disruption, and complete the project on schedule and within budget.

Although technically feasible, this alternative would meet the project sponsor's primary objective of maximizing affordable housing opportunities to a substantially lesser degree than the proposed project and could potentially be financially prohibitive. This alternative would produce a project with ~~323~~ affordable residential units, compared to the 67-unit proposed project that would demolish the existing building and thereby create a significant impact on the 6SL historic district.

D. DRAFT EIR REVISIONS

The following text changes are made in response to the Response to Comments as well as some staff initiated text changes. These changes primarily consist of an augmented discussion of Alternative B, the preservation alternative, and the addition of Alternative C, the partial preservation alternative. None of these changes result in a substantial change to the project description or analysis and do not change the overall conclusions of the DEIR. Text to be omitted is formatted as ~~striketrough~~ text and text to be added is formatted as double underline text.

Table of Contents on page i of the DEIR is revised as follows:

VII.	Alternatives	99
A.	Alternative A: No Project.....	100
B.	Alternative B: Preservation Alternative.....	102
<u>C.</u>	<u>Alternative C: Partial Preservation Alternative.....</u>	<u>105</u>
<u>C</u> <u>D.</u>	<u>Alternatives Considered But Rejected.....</u>	<u>106</u>
<u>D</u> <u>E.</u>	<u>Environmentally Superior Alternative.....</u>	<u>106</u>

Table of Contents on page ii of the DEIR is revised as follows:

LIST OF FIGURES

Figure 19	Historic and Preservation Districts in the Project Vicinity	77
<u>Figure 19A</u>	<u>Preservation Alternative Proposed Ground Floor Plan.....</u>	<u>102A</u>
<u>Figure 19B</u>	<u>Preservation Alternative Proposed Second, Third, and Fourth Floor Plans.....</u>	<u>102B</u>
<u>Figure 19C</u>	<u>Preservation Alternative Proposed Fifth Floor Plan (Sixth Floor Similar).....</u>	<u>102C</u>
<u>Figure 19D</u>	<u>Preservation Alternative Proposed Roof Plan</u>	<u>102D</u>
Figure 20	Preservation Alternative: 6 th Street Elevation	103
Figure 21	Preservation Alternative: Howard Street Elevation.....	104
<u>Figure 22</u>	<u>Partial Preservation Alternative Proposed Ground Floor Plan.....</u>	<u>105B</u>
<u>Figure 23</u>	<u>Partial Preservation Alternative</u> <u>Proposed Second, Third, and Fourth Floor Plans.....</u>	<u>105C</u>
<u>Figure 24</u>	<u>Partial Preservation Alternative</u>	

	<u>Proposed Fifth Floor Plan (Sixth Floor Similar).....</u>	<u>105D</u>
Figure 25	<u>Partial Preservation Alternative Proposed Seventh Floor Plan</u>	<u>105E</u>
Figure 26	<u>Partial Preservation Alternative Proposed Eighth Floor Plan.....</u>	<u>105F</u>
Figure 27	<u>Partial Preservation Alternative 6th Street Elevation.....</u>	<u>105G</u>
Figure 28	<u>Partial Preservation Alternative Howard Street Elevation.....</u>	<u>105H</u>

LIST OF TABLES

Table S-1	Summary of Potentially Significant Impacts and Mitigation Measures.....	4
Table S-2	Comparison of Significant Impacts – Proposed Project and Preservation Alternatives.....	22
Table 1	Project Characteristics.....	39
Table 2	Comparison of Significant Impacts – Proposed Project and Preservation Alternatives.....	107

Table S-1 on pages 10-11 of the DEIR is revised on the following page.

CP-4: Historical Architectural Resources. The proposed demolition of the 200-214 6th Street building, a contributor building to a National Register-eligible historic district would result in a significant project-specific and cumulative historic architectural resource impact.

Significant

M-CP-4a (HABS Documentation): Implementation of this mitigation measure would reduce Impact CP-4 (historic architectural resources), but not to a less-than-significant level. Therefore, impacts related to the demolition of the 200-214 6th Street building would remain significant and unavoidable. However, to partially offset ~~partially~~ the loss of the resource building, the project sponsor shall at a minimum, ensure that a complete survey meeting the standards of the Historic American Building Survey (HABS) is undertaken prior to demolition, as follows:

- Prior to approval of the demolition permit, the Project Sponsor shall undertake HABS (Historic American Building Survey) documentation of the subject property. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The documentation shall consist of the following:
 - *HABS-Level Photography:* Archival photographs of the interior and the exterior of subject property. Large format negatives are not required. Digital photography may be taken, as guided by HABS/HAER/HALS Photography Guidelines. Generally, the following requirements shall apply: the digital sensor size should be at least full frame (35mm) with a minimum of 24 megapixels taken with a perspective correction or other lens resulting in photographs that do not require post-processing. Photographic prints should be accompanied by a data sheet from the printer noting the paper used, printer model, type of ink, and estimated longevity. The scope and number of the archival photographs shall be reviewed and approved by Planning Department Preservation staff ~~for concurrence~~, and all photography shall be conducted according to the latest National Park Service standards and guidelines Standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS Photography, and shall ~~must~~ be labeled according to HABS Photography Guidelines Standards; and,
 - *HABS Historical Report:* A written historical narrative and report, per HABS Historical Report Guidelines.

The professional shall prepare the documentation and submit it for review and approval by the San Francisco Planning Department's Preservation Technical Specialist. The final documentation shall be disseminated to the San Francisco Planning Department, San Francisco Library History Room, Northwest Information Center-California Historical Resource Information System, and San Francisco Architectural Heritage.

Significant and Unavoidable

Mitigation Measure M-CP-4b (Interpretative Display): Implementation of this mitigation measure would reduce Impact CP-4 (historic architectural resources), but not to a less-than-significant level. Therefore, impacts related to the demolition of the 200-214 6th Street building would remain significant and unavoidable. However, to partially offset the loss of the resource, the project sponsor shall incorporate an exhibit/interpretative display on the history of the building, the Defenestration art installation, and the surrounding historic district prior to approval of the demolition permit. It should be noted that the Defenestration art installation is included in the exhibit/interpretative display although the art installation, itself, is not an historic resource. The documentation and interpretive display shall be designed by a qualified professional who meets the standards for history or architectural history (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). Planning Department Preservation staff shall review and approve the scope, content, design and location of the new exhibit/interpretative display. The new exhibit/interpretative display shall be located within a publicly-accessible or publicly viewable area within the new buildings, as determined by Planning Department Preservation staff and the Environmental Review Officer.

Table S-1 on page 12 of the DEIR is revised as follows²:

Mitigation Measure M-NO-1b: Window and Wall Assemblies. The project sponsor shall construct the proposed residential units with the following window and wall assemblies: Windows shall be Torrance 2500 windows or approved equal with one-inch dual-glazed frames with 7/16-inch laminated glazing, 5/16-inch air space, and ¼-inch glazing; exterior walls shall consist of 3/8-inch plywood; 2x6-inch wood stud or 16-gauge steel stud, 16 inches on center with fiberglass sheets in stud cavities; resilient channels⁴; and ½-inch gypsum board.

² Mitigation Measure M-NO-1b: Window and Wall Assemblies was not revised in response to a comment on the DEIR, but rather to allow the project sponsor to identify a cost effective choice from among several windows manufacturers, to meet Title 24 standards.

Summary discussion of the alternatives on page 21 of the DEIR is revised as follows:

ALTERNATIVE B: PRESERVATION ALTERNATIVE

The Preservation Alternative would not demolish the 200-214 6th Street historical building and would restore it to the Secretary of Interior's Standards and add a one-story addition that meets the Secretary of the Interior's Standards for Rehabilitation. This alternative would add a one-story vertical addition at the fifth floor that would be set back by ~~40~~ 7 feet 5 inches, and would have a total of ~~323~~ dwelling units and ~~2,571~~ 2,265 square feet of ground-floor retail space. ~~There would be no rear yard open space, unlike the proposed project.~~ The Preservation Alternative would also have a 905 -square-foot community room, 400 square feet of private open space, and 3,380 square feet of common open space. The Preservation Alternative would avoid the proposed project's impacts on archeological resources, and would have the same impacts as the proposed project relating to interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, and hazardous materials, which would be less than significant with mitigation incorporated. All other impacts would remain less than significant.

ALTERNATIVE C: PARTIAL PRESERVATION ALTERNATIVE

Alternative C, the Partial Preservation Alternative, would not demolish the existing 200-214 6th Street building, but would retain and preserve the building's exterior shell, and constructing a four-story vertical addition that would fill out the maximum allowable zoning envelope. The proposed massing for the Partial Preservation Alternative would have three parts: the existing building envelope on the first through fourth floors, a small setback on the fifth and sixth floors to allow for light and air behind the existing tall parapet, and the seventh and eighth floors built out to the property line to maximize floor area. This alternative would have 52 dwelling units, 1,810 square feet of ground-floor commercial space. This alternative would have a 1,250-square-foot community room, 5,250 square feet of common open space, and 400 square feet of private open space.

Table S-2 on page 22 of the DEIR is revised on the following page.

Table S-2
Comparison of Significant Impacts – Proposed Project and Preservation Alternatives

	Proposed Project	Preservation Alternative	<u>Partial Preservation Alternative</u>
Description: - Height - Fifth Floor Setback - Residential - Common Open Space - Private Open Space - Commercial Space - Community Room - Service/Circulation - Total (excludes open space) - Rear Yard Setback - Bicycle Parking - Vehicle Parking	85 feet, 9 stories None 67 units, 47,710 sq. ft. 3,691 sq.ft. 2,589 sq. ft. 2,845 sq. ft. 1,215 sq. ft. 16,770 sq. ft. 68,540 sq. ft. 14% 29 spaces None	61 55 feet, 5 stories 7'-5" @ Howard & 8'-0" @ 6th Street 10 feet 323 units, 25,261 sq. ft. 32,880 sq. ft. 3,380 sq. ft. None 400 sq. ft. None 2,265 sq. ft. 2,571 sq. ft. 905 sq. ft. None 11,788 sq. ft. None 40,219 sq. ft. 35,451 sq. ft. 12.5% None 28 spaces None None	85 feet, 8 stories 7'-5" @ Howard & 8'-0" @ 6th Street 52 units, 40,243 sq. ft. 5,250 sq. ft. 400 sq. ft. 1,810 sq. ft. 1,250 sq. ft. 15,560 sq. ft. 58,863 sq. ft. 17.3% 26 spaces None
Impacts (Significance Level After Mitigation):			
Historical Resources	Significant and Unavoidable	Less than Significant	<u>Significant and Unavoidable</u>
Archeological Resources	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Human Remains	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Interior and Exterior Noise	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Construction Noise	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Construction Air Quality	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Toxic Air Contaminants	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Hazardous Materials (<i>Existing Building Materials</i>)	Less Than Significant	Less Than Significant	<u>Less than Significant</u>
Hazardous Materials (<i>Contaminated Soils</i>)	Less Than Significant	Less Than Significant	<u>Less than Significant</u>

The following text is revised on pages 93-94 of the DEIR:

Mitigation Measure M-CP-4a (HABS Documentation)

Completing a historical resources survey to HABS documentation standards would reduce the Impact CP-4, but not to a less-than-significant level. (Significant, Unavoidable)

Implementation of this mitigation measure would reduce Impact CP-4 (historic architectural resources), but not to a less-than-significant level. Therefore, impacts related to the demolition of the 200-214 6th Street building would remain significant and unavoidable. However, to partially offset ~~partially~~ the loss of the resource building, the project sponsor shall at a minimum, ensure that a complete survey meeting the standards of the Historic American Building Survey (HABS) is undertaken prior to demolition, as follows:

- Prior to approval of the demolition permit, the Project Sponsor shall undertake HABS (Historic American Building Survey) documentation of the subject property. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61).

The documentation shall consist of the following:

- *HABS-Level Photography*: Archival photographs of the interior and the exterior of subject property. Large format negatives are not required. Digital photography may be taken, as guided by HABS/HAER/HALS Photography Guidelines. Generally, the following requirements shall apply: the digital sensor size should be at least full frame (35mm) with a minimum of 24 megapixels taken with a perspective correction or other lens resulting in photographs that do not require post-processing. Photographic prints should be accompanied by a data sheet from the printer noting the paper used, printer model, type of ink, and estimated longevity. The scope and number of the archival photographs shall be reviewed and approved by Planning Department Preservation staff ~~for concurrence~~, and all photography shall be conducted according to the latest National Park Service standards and guidelines ~~Standards~~. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS Photography, and shall ~~must~~ be labeled according to HABS Photography Guidelines ~~Standards~~; and,
- *HABS Historical Report*: A written historical narrative and report, per HABS Historical Report Guidelines.

The professional shall prepare the documentation and submit it for review and approval by the San Francisco Planning Department's Preservation Technical Specialist. The final documentation shall be disseminated to the San Francisco Planning Department, San Francisco Library History Room, Northwest Information Center-California Historical Resource Information System, and San Francisco Architectural Heritage.

The following text is added to the DEIR on page 94:

Mitigation Measure M-CP-4b (Interpretative Display)

Completing a historical resources survey to HABS documentation standards would reduce the Impact CP-4, but not to a less-than-significant level. (Significant, Unavoidable)

Implementation of this mitigation measure would reduce Impact CP-4 (historic architectural resources), but not to a less-than-significant level. Therefore, impacts related to the demolition of the 200-214 6th Street building would remain significant and unavoidable. However, to partially offset the loss of the resource, the project sponsor shall incorporate an exhibit/interpretative display on the history of the building, the Defenestration art installation, and the surrounding historic district prior to approval of the demolition permit. It should be noted that the Defenestration art installation is included in the exhibit/interpretive display although the art installation, itself, is not an historic resource. The documentation and interpretive display shall be designed by a qualified professional who meets the standards for history or architectural history (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). Planning Department Preservation staff shall review and approve the scope, content, design and location of the new exhibit/interpretative display. The new exhibit/interpretative display shall be located within a publicly-accessible or publicly viewable area within the new buildings, as determined by Planning Department Preservation staff and the Environmental Review Officer.

The following text is added to the DEIR on page 99:

Alternatives were selected that would reduce identified impacts of the proposed project and include the following:

- Under the CEQA-required *No-Project Alternative*, there would be no change on the project site and no environmental impacts.
- The *Preservation Alternative* would not demolish the 200-214 6th Street building, would restore it to the Secretary of Interior's Standards, and would construct a fifth-story addition that would be set back from the street façades by 10 feet. This alternative would have a less-than-significant impact on historic architectural resources, thereby avoiding the proposed project's significant and unavoidable impact, and its associated mitigation measure. While it would not involve demolition, this alternative would require mitigation measures for interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, archeological resources, and hazardous materials (contaminated soil and water, and hazardous building materials), which would be reduced to less than significant with the same mitigation measures as the proposed

project. All other impacts would be less than significant as they would under the proposed project.

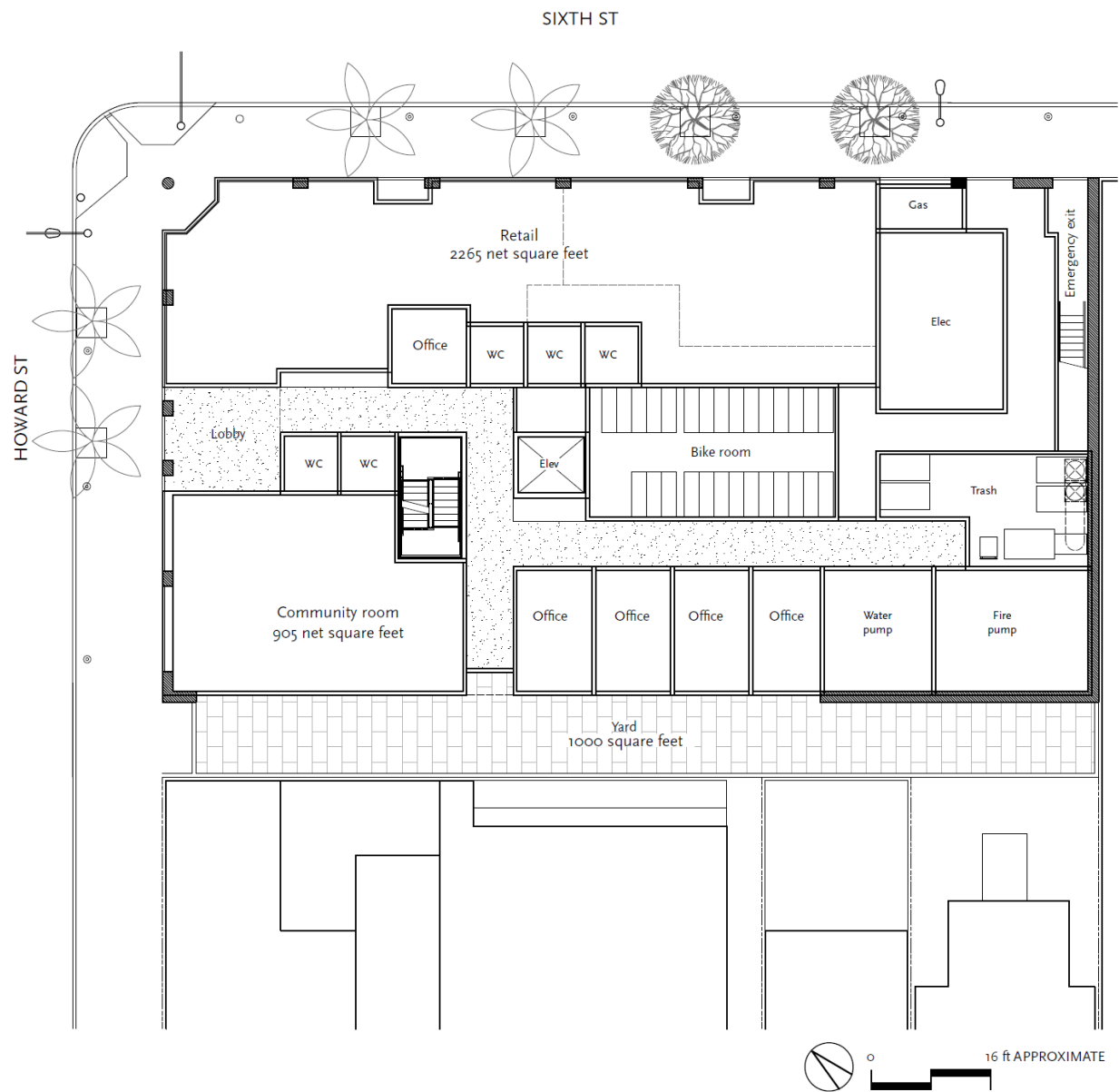
- The *Partial Preservation Alternative* would not demolish the 200-214 6th Street building, but would retain and preserve the building's exterior shell, while accommodating as much of the proposed project's program as possible. Maximizing the proposed project's program would be accomplished via a four-story vertical addition to fill out the maximum allowable zoning envelope. However, this addition would not meet the Secretary of the Interior's Standards for Rehabilitation. Therefore, this alternative would have significant unavoidable impact on historic architectural resources as under the proposed project. While it would not involve demolition, this alternative would require mitigation measures for interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, archeological resources, and hazardous materials (contaminated soil and water, and hazardous building materials), which would be reduced to less than significant with the same mitigation measures as the proposed project. All other impacts would be less than significant as under the proposed project.

The following text is revised, beginning on page 102 of the DEIR:

B. ALTERNATIVE B: PRESERVATION ALTERNATIVE

DESCRIPTION

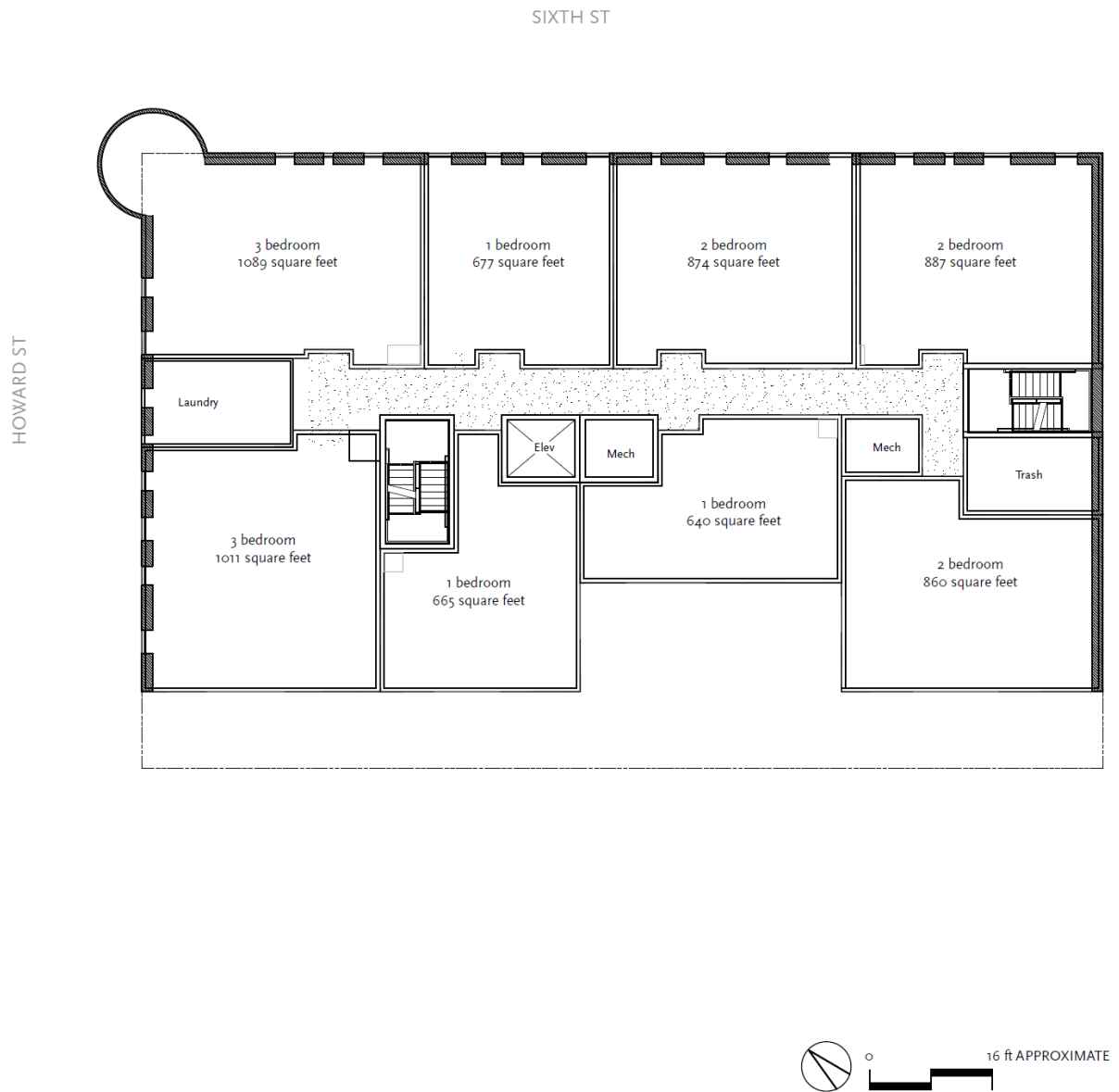
Alternative B, the Preservation Alternative, would not demolish the historical 200-214 6th Street building, but would retain it and restore it to the Secretary of Interior's Standards, while accommodating as much of the project sponsor's program as possible. The floor plans for the Preservation Alternative are included in Figures 19A through 19D on pages 102A-102D. This alternative would retain all character-defining features of the existing building, including all exterior elevations and rooflines visible from the public right of way. It would also ~~feature~~ include a fifth-story addition set back ~~10~~ 7 feet 5 inches from the fourth story on Howard Street and 8 feet on 6th Street to minimize the visual effect on both the existing building and the historical resource district, topped with a roof deck to meet the Planning Code usable open space requirement. (See Figures 20 and 21 on pages 103 and 104 for elevations of this alternative.)



Source: Kennerly Architecture

6-25-13

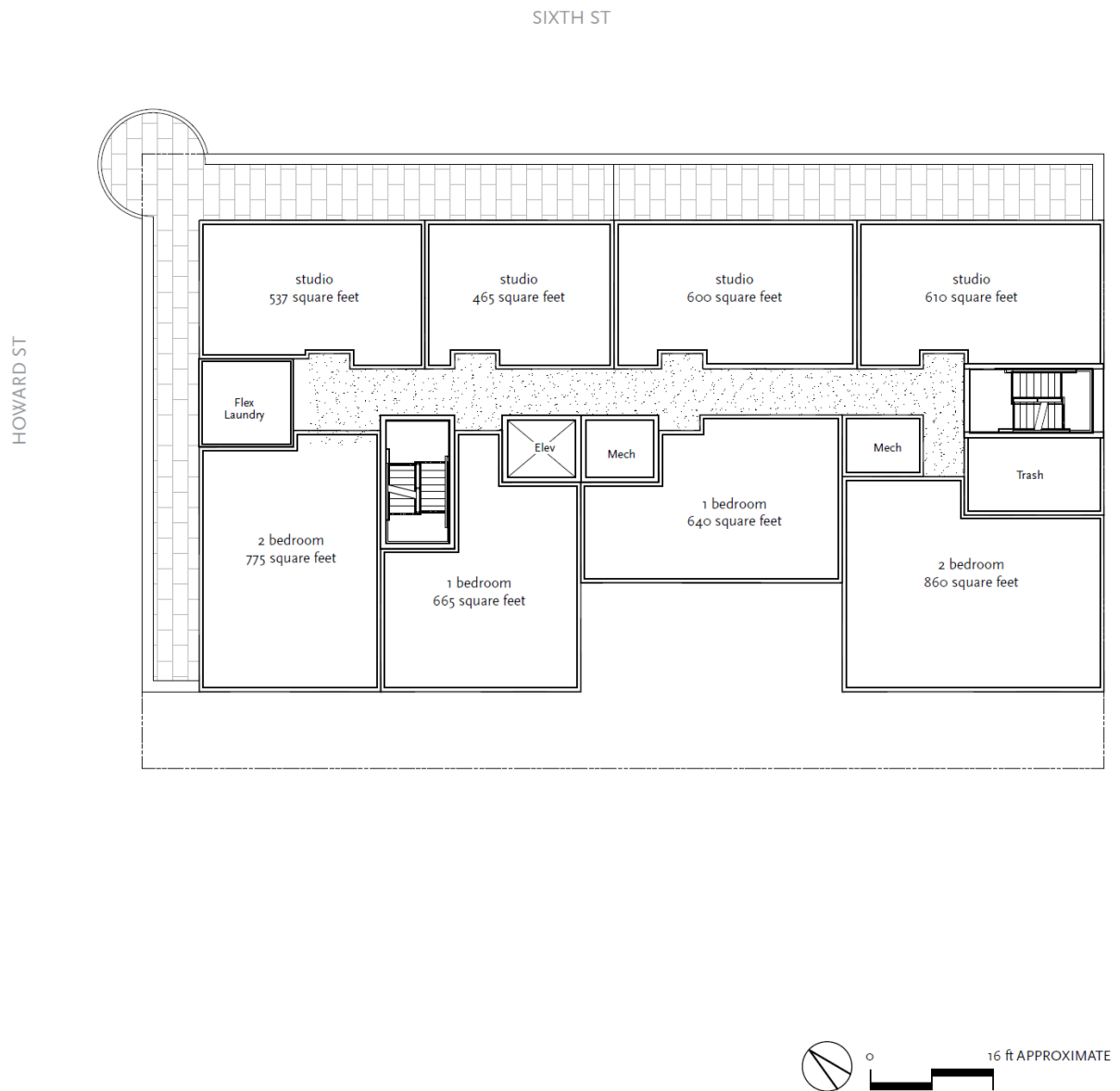
Preservation Alternative Proposed Ground Floor Plan Figure 19A



Source: Kennerly Architecture

6-25-13

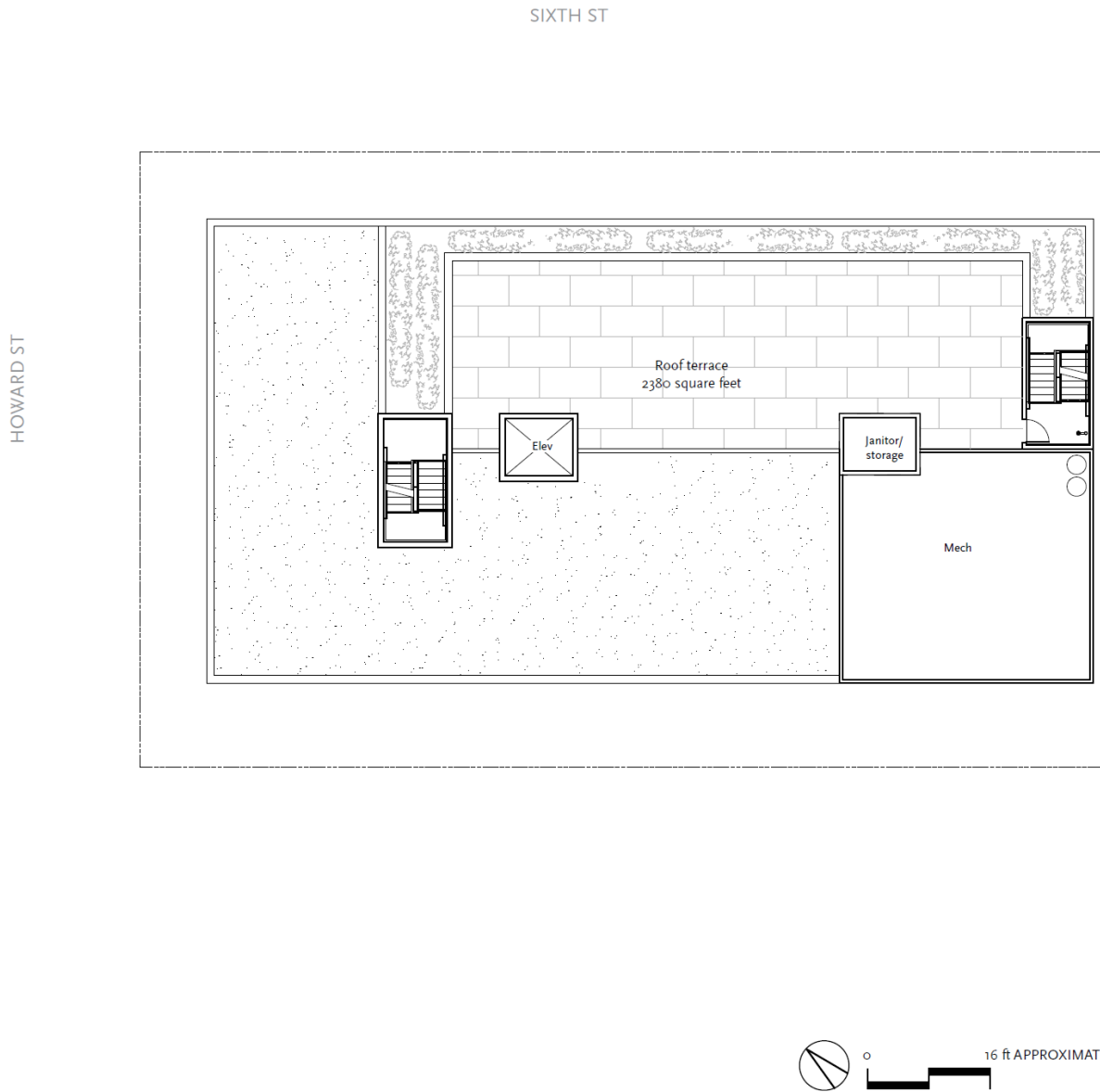
Preservation Alternative Proposed Second, Third, and Fourth Floor Plans Figure 19B



Source: Kennerly Architecture

6-26-13

Preservation Alternative Proposed Fifth Floor Plan (Sixth Floor Similar) Figure 19C



Source: Kennerly Architecture

6-25-13

Preservation Alternative Proposed Roof Plan Figure 19D



Source: Kennerly Architecture

6-25-13

Preservation Alternative 6th Street Elevation Figure 20



Source: Kennerly Architecture

6-25-13

Preservation Alternative Howard Street Elevation Figure 21

Under the Preservation Alternative, the street-facing masonry walls of the existing building would be reinforced, retained in place through construction, and adapted as the exterior shell including new windows and upgrades for insulation, fire-protection, water-proofing, and noise reduction (Title 24 Standards). Inside, the building's stairs and cores would be replaced, the light well would be filled in, and all new building systems, partitions, and finishes would be constructed.

The program for this alternative is limited by two constraints: (1) the number of stories that could be added to the existing building without causing a significant unavoidable impact on the historic district. The construction of a one-story vertical addition on the existing four-story masonry building meets the Secretary of the Interior's Standards for Rehabilitation, since the mass and bulk of the new addition would be deferential to the mass and bulk of the existing building, however no additional stories could be added, and (2) the layout of the existing windows which feature large and small sizes, which would drive the interior unit planning. As a result of these constraints, this alternative would have a reduced floor area compared with the proposed project. The resulting program areas would be proportionate in terms of size and similar in quality to the proposed project.

Given these constraints, the Preservation Alternative would result in a building that is The approximately ~~6155-foot~~ 6155-foot-tall building would have with a footprint similar to the proposed project. The Preservation Alternative would include a total of ~~323~~ dwelling units (six three-bedroom, ~~113~~ two-bedroom, ~~13~~ nine one-bedroom, and ~~two~~ five studios) and ~~2,571~~ 2,265 square feet of ground-floor retail space, compared to the proposed project's 67 dwelling units, and approximately 2,845 square feet of ground-floor commercial space. The Preservation Alternative would also have a 905 -square-foot community room, 400 square feet of private open space, and 3,380 square feet of common open space compared to the 1,215-square-foot community room, 2,589 square feet of private open space, and 3,691 square feet of common open space (respectively) under the proposed project. Like proposed project, the Preservation Alternative would not include on-site parking.

Usable ~~The only~~ open space under the Preservation Alternative would include a ground floor yard that opens to the community room, some private residential patios at the setback fifth floor, and a common roof deck serving all residents. ~~be the 10-foot-wide gated open space extant along~~

~~the west side of the building. The common space would be consistent with and proportional to the common space under the proposed project, laundry rooms and internal corridors would have windows to the outside and daylight, respectively. The community room would face onto the street and the rear yard. The retail space would line 6th Street within the existing abandoned retail bays, building services would be clustered at the south end, similar to the proposed project.~~

Like the proposed project, the Preservation Alternative would require findings of *General Plan* and Priority Policies consistency, conditional use authorization for construction on a site equal to or exceeding 10,000 square feet and establishment of a possible full service restaurant, building permits, permits for any curb or road modifications, and EIR certification. Unlike the proposed project, the Preservation Alternative would not require discretionary review for demolition of a residential building or demolition permit approval, an open space variance, a dwelling unit exposure variance, or street and sidewalk permits.

IMPACTS

The Preservation Alternative would avoid the proposed project's significant and unavoidable historic architectural resources impact identified in this EIR. ~~Given that the~~ The Preservation Alternative would likely not require foundation upgrades which could include excavation, grading, and/or the installation of soil cement columns, therefore, this alternative ~~could also~~ avoid the proposed project's result in an impact on archeological resources and human remains, which would be potentially significant but would be reduced to less-than-significant by mitigation measures identified in this EIR. This alternative would have the same potentially significant interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, and hazardous materials impacts, that the Initial Study (Appendix A) and this EIR identify (see Table S-1, Summary of Impacts and Mitigation Measures, page 4. These potentially significant impacts would be reduced to a less-than-significant level after implementation of mitigation measures identified for the proposed project, which would apply to this alternative. The Preservation Alternative would have impacts similar to or reduced from the proposed project's less-than-significant impacts without mitigation as discussed in the Initial Study (Appendix A). These impacts are in the following areas: land use, aesthetics, population and housing, transportation, greenhouse gas emissions, wind and shadow, recreation, utilities and

service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agriculture and forest resources.

The Preservation Alternative would partially meet the project sponsor's objective to increase affordable housing opportunities in San Francisco, because this alternative would have about 50 percent fewer residential units than the proposed project. However, this alternative would meet other objectives of the project sponsor to design a project that complements the existing urban character of the area, develop a project with minimal environmental disruption, and complete the project on schedule and within budget.

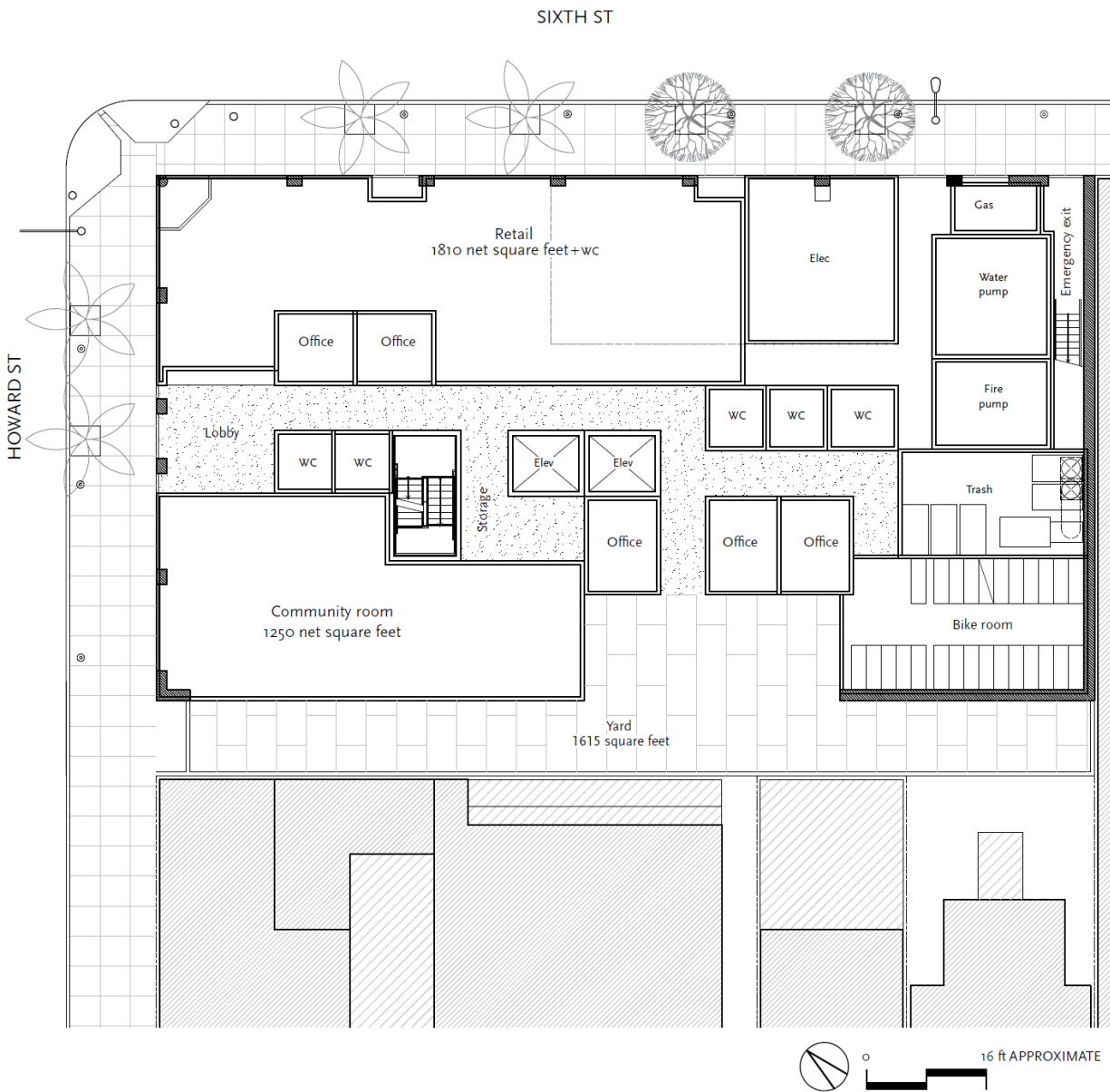
Although technically feasible, this alternative would meet the project sponsor's primary objective of maximizing affordable housing opportunities to a substantially lesser degree than the proposed project and could potentially be financially prohibitive. This alternative would produce a project with 323 affordable residential units, compared to the 67-unit proposed project that would demolish the existing building and thereby create a significant impact on the 6SL historic district.

The following text and figures are added to the DEIR starting on new page 105A:

C. ALTERNATIVE C: PARTIAL PRESERVATION ALTERNATIVE

DESCRIPTION

Alternative C, the Partial Preservation Alternative, would not demolish the existing 200-214 6th Street building, but would retain and preserve the building's exterior shell, while accommodating as much of the proposed project's program as possible. The floor plans for the Partial Preservation Alternative are included in Figures 22 through 28 on pages 105B through 105H. The existing street-facing masonry walls would be reinforced, retained in place through construction, and adapted as the exterior shell including new windows and necessary upgrades for insulation, fire-protection, water-proofing, and noise reduction (to meet Title 24 interior standards).



Source: Kennerly Architecture
6-25-13

Partial Preservation Alternative Proposed Ground Floor Plan Figure 22



Source: Kennerly Architecture

6-25-13

Partial Preservation Alternative Proposed Second, Third, and Fourth Floor Plans Figure 23



Source: Kennerly Architecture

6-26-13

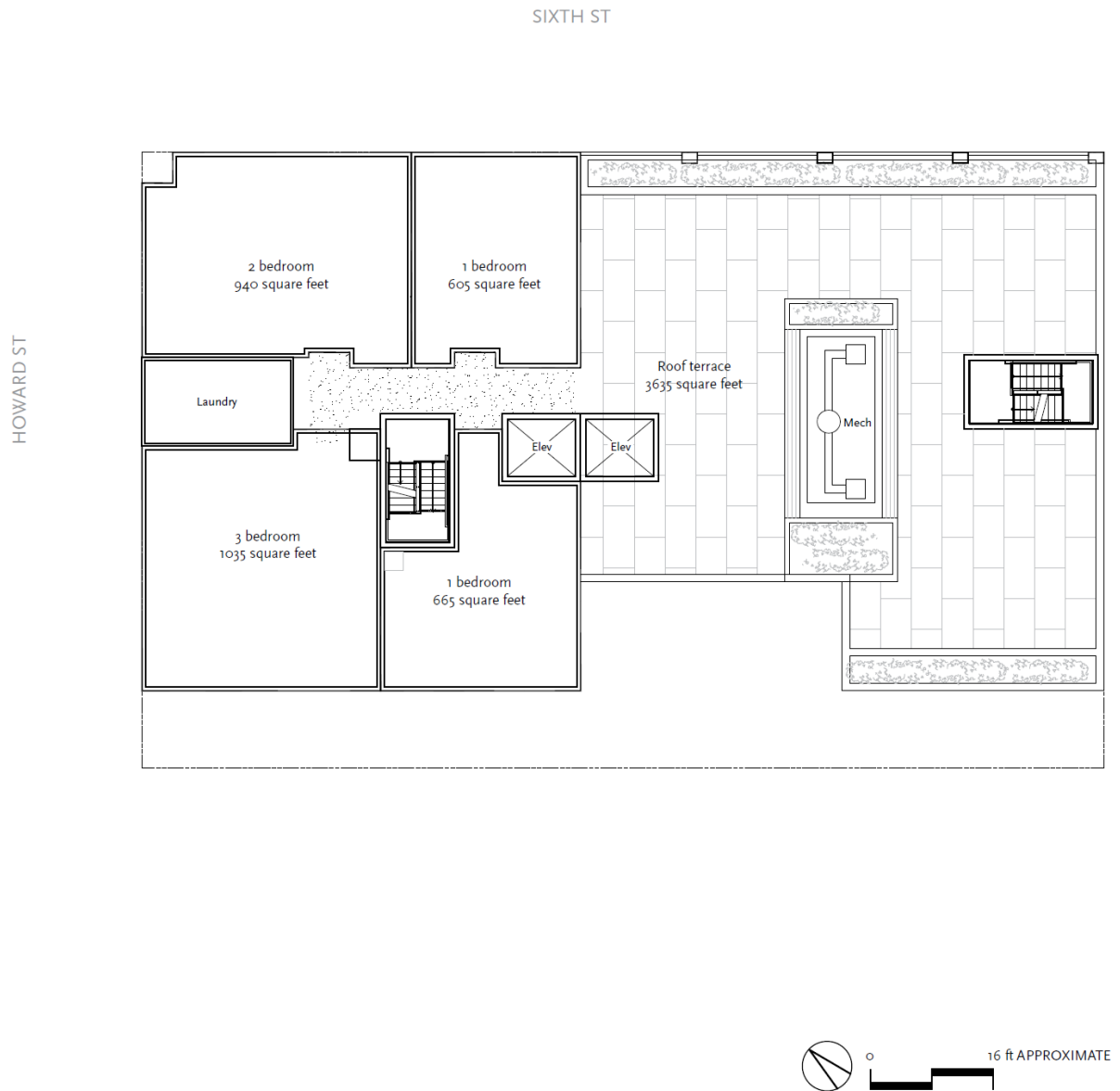
Partial Preservation Alternative Proposed Fifth Floor Plan (Sixth Floor Similar) Figure 24



Source: Kennerly Architecture

6-25-13

Partial Preservation Alternative Proposed Seventh Floor Plan Figure 25



Source: Kennerly Architecture

6-25-13

Partial Preservation Alternative Proposed Eighth Floor Plan Figure 26



Source: Kennerly Architecture

6-25-13

Partial Preservation Alternative 6th Street Elevation Figure 27



Source: Kennerly Architecture

6-25-13

Partial Preservation Alternative Howard Street Elevation Figure 28

The Partial Preservation Alternative would also construct a four-story vertical addition which fills out the maximum allowable zoning envelope to the height limit of 85-feet at the roof and built out to both street fronting property lines. As shown in Figures 27 and 28 on pages 105G and 105H, the proposed massing for the Partial Preservation Alternative has three parts: the existing building envelope on the first through fourth floors, a small setback on the fifth and sixth floors to allow for light and air behind the existing tall parapet, and the seventh and eighth floors built out to the property line to maximize floor area.

The new additions to the building would be distinct in architectural character from the existing building, and the setback on the fifth and sixth floors would help to further distinguish the old from the new, consistent with the Secretary of the Interior's Standards for Rehabilitation.

The program for this alternative is constrained by two factors: (1) the existing floor-to-floor heights, which effectively eliminate an entire floor to fit within the 85-foot height limit, and (2) the tall parapet on the existing building which requires a small setback at the fifth and six floors to allow light and air for the dwelling units on these floors. The result is that this alternative would have a reduced floor area compared with the proposed project even though the building envelope is maximized. The resulting program areas would be proportionate in terms of size and similar in quality to the proposed project. This alternative would accommodate more dwelling units than the full Preservation Alternative, but fewer dwelling units than the proposed project.

Given the physical constraints, the Partial Preservation Alternative would include a total of 52 dwelling units (eight three-bedroom, 18 two-bedroom, 22 one-bedroom and four studios), and 1,810 square feet of ground-floor retail/commercial space, compared to the proposed project's 67 dwelling units, and approximately 2,845 square feet of ground-floor retail/commercial space. The Partial Preservation Alternative would also include a 1,250-square-foot community room, but would not include on-site parking the same as under the proposed project.

The usable open space would be consistent with that in the proposed project design including a ground floor yard open to the community room, some private residential patios at the setback fifth floor and a common roof deck serving all residents. The common space would be consistent and proportional, laundry rooms and internal corridors would have windows to the outside and daylight, respectively. The community room would face onto the street and the rear yard. The

retail space would line 6th Street within the existing abandoned retail bays, and building services would be clustered at the south end, similar to the proposed project.

Like the proposed project, the Partial Preservation Alternative would require findings of *General Plan* and *Priority Policies* consistency, conditional use authorization for construction on a site equal to or exceeding 10,000 square feet and establishment of a possible full service restaurant, building permits, permits for any curb or road modifications, and EIR certification. Unlike the proposed project, the Preservation Alternative would not require discretionary review for demolition of a residential building or demolition permit approval, an open space variance, a dwelling unit exposure variance, or street and sidewalk permits.

IMPACTS

The Partial Preservation Alternative would not reduce the historic resource impact of the proposed project to a less-than-significant level, since the Partial Preservation Alternative would still have a significant impact upon the existing building and the surrounding historic district. The construction of a four-story vertical addition on the existing four-story masonry building does not meet the Secretary of the Interior's Standards for Rehabilitation, since the mass and bulk of the new addition would not be deferential to the mass and bulk of the existing building. As a result, although the existing building would not be demolished, the partially preserved building would have a significant impact on the historic district. Therefore, the Partial Preservation Alternative would still result in a significant and unavoidable impact to historic resources on the project site.

Given that the Partial Preservation Alternative would result in a building of similar height and size to the proposed project, a similar foundation system would likely be employed. Therefore, the Partial Preservation Alternative would require similar excavation, and grading, and likely the installation of soil cement columns (although possibly to a lesser depth than the proposed project). Therefore, this alternative would not avoid the proposed project's impact on archeological resources and human remains, which would be potentially significant but would be reduced to less-than-significant by mitigation measures identified in this EIR.

This alternative would have the same potentially significant interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, and hazardous materials

impacts, that the Initial Study (Appendix A) and this EIR identify for the proposed project (see Table S-1, Summary of Impacts and Mitigation Measures, page 4). These potentially significant impacts would be reduced to a less-than-significant level after implementation of mitigation measures identified for the proposed project, which would also apply to this alternative. The Partial Preservation Alternative would have impacts similar to or reduced from the proposed project's less-than-significant impacts without mitigation as discussed in the Initial Study (Appendix A). These impacts are in the following areas: land use, aesthetics, population and housing, transportation, greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agriculture and forest resources.

The Partial Preservation Alternative would partially meet the project sponsor's objective to increase affordable housing opportunities in San Francisco, because this alternative would have 33 percent fewer residential units than the proposed project. However, the Partial Preservation Alternative would meet other objectives of the project sponsor to design a project that complements the existing urban character of the area, develop a project with minimal environmental disruption, and complete the project on schedule and within budget.

The Partial Preservation Alternative would meet the project sponsor's primary objective of maximizing affordable housing opportunities to a lesser degree than the proposed project and could potentially be financially prohibitive. This alternative would produce a project with 52 affordable residential units, compared to the 67-unit proposed project that would demolish the existing building and thereby create a significant impact on the 6SL historic district. However, this alternative would also result in a significant impact on the 6SL historic district given that the addition to the building does not meet the Secretary of the Interior's Standards for Rehabilitation.

The following text is revised on page 106 of the DEIR:

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As discussed in the preceding subsections, the proposed mixed-use project would have a significant and unavoidable historical resource impact. As identified in this EIR and the Initial Study (Appendix A), the proposed project would also have potentially significant archeological,

interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, and hazardous materials impacts that would be reduced to less-than-significant levels with proposed mitigation measures. It would also have other less-than-significant impacts in the areas of land use, aesthetics, population and housing, transportation, greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agriculture and forest resources.

The Preservation Alternative would avoid the proposed project's significant and unavoidable historic architectural resource impact, and ~~also would avoid the proposed project's impact on archeological resources (which could be reduced to less-than-significant levels by mitigation measures identified in this EIR).~~ The Preservation Alternative would have similar or reduced potentially significant interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, ~~and hazardous materials, and archeological resources~~ impacts, and would otherwise have similar or reduced less-than-significant impacts.

The Partial Preservation Alternative would not avoid the proposed project's significant and unavoidable historic architectural resource impact, and would have potentially significant interior and exterior noise, construction noise, construction air emissions, toxic air contaminants, hazardous materials, and archeological resources impacts which are similar or reduced as compared to the proposed project.

The No Project Alternative would avoid all impacts of the proposed project until another project proposal was submitted for the project site.

Table 2, page 107, compares significant impacts between the proposed project, the Partial Preservation Alternative, and the Preservation Alternative. The No Project Alternative is not included in this table.

The Preservation Alternative would reduce the historical resource impact to a less-than-significant level, and would be the environmentally superior alternative.

Table 2 on page 107 of the DEIR is revised as follows:

Table 2
Comparison of Significant Impacts – Proposed Project and Preservation Alternatives

	Proposed Project	Preservation Alternative	<u>Partial Preservation Alternative</u>
Description: - Height - Fifth Floor Setback - Residential - Common Open Space - Private Open Space - Commercial Space - Community Room - Service/Circulation - Total (excludes open space) - Rear Yard Setback - Bicycle Parking - Vehicle Parking	85 feet, 9 stories None 67 units, 47,710 sq. ft. 3,691 sq.ft. 2,589 sq. ft. 2,845 sq. ft. 1,215 sq. ft. 16,770 sq. ft. 68,540 sq. ft. 14% 29 spaces None	61 55 feet, 5 stories 7'-5" @ Howard & 8'-0" @ 6th Street 10 feet 323 units, 25,261 sq. ft. 32,880 sq. ft. 3,380 sq. ft. None 400 sq. ft. None 2,265 sq. ft. 2,571 sq. ft. 905 sq. ft. None 11,788 sq. ft. None 40,219 sq. ft. 35,451 sq. ft. 12.5% None 28 spaces None None	85 feet, 8 stories 7'-5" @ Howard & 8'-0" @ 6th Street 52 units, 40,243 sq. ft. 5,250 sq. ft. 400 sq. ft. 1,810 sq. ft. 1,250 sq. ft. 15,560 sq. ft. 58,863 sq. ft. 17.3% 26 spaces None
Impacts (Significance Level After Mitigation):			
Historical Resources	Significant and Unavoidable	Less than Significant	<u>Significant and Unavoidable</u>
Archeological Resources	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Human Remains	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Interior and Exterior Noise	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Construction Noise	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Construction Air Quality	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Toxic Air Contaminants	Less Than Significant	Less than Significant	<u>Less than Significant</u>
Hazardous Materials (<i>Existing Building Materials</i>)	Less Than Significant	Less Than Significant	<u>Less than Significant</u>
Hazardous Materials (<i>Contaminated Soils</i>)	Less Than Significant	Less Than Significant	<u>Less than Significant</u>

ATTACHMENT 1

COMMENT LETTERS

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Comment Letter A

200-214 6th Street Affordable Housing with Ground Floor Retail Project DEIR
Case No. 2011.0119E

Comments

1. Historic Resources. Add a mitigation measure requiring the preparation of an exhibit/interpretive program about the building and the exterior artwork. Consideration should be given to having an interpretive exhibit on the exterior of the building visible to anyone passing on the sidewalk and a more detailed exhibit/interpretive program in the building lobby or other publically accessible space. The interpretive program can draw from the work already prepared for the DEIR and the HABS Documentation.

**1,
CP-1**

2. HABS-Level Photography. "Large format negatives are not required." Is this intended to mean that digital photography is allowable? If so, the digital sensor size should be at least full frame (35mm) with a minimum of 24 megapixels taken with a perspective correction or other lens resulting in photographs that do not require post-processing in Lightroom, Photoshop, Aperture, DxO Optics, or other program. Photographic prints should be accompanied by a data sheet from the printer noting the paper used, printer model, type of ink, and estimated longevity.

**2,
CP-3**

Hisashi Sugaya
Planning Commission



Comment Letter B

SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: April 11, 2013
TO: Sarah B. Jones, Acting Environmental Review Officer
FROM: Historic Preservation Commission
CC: Jonas P. Ionin, Acting Historic Preservation Commission Secretary
Tim Frye, Preservation Coordinator
Rachel Schett, Environmental Planner
RE: **Review and Comment on Draft Environmental Impact Report (DEIR)**
200-214 6th Street
Case No. 2011.0119E

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. On March 6, 2013 and March 20, 2013, the Historic Preservation Commission (HPC) held public hearings and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed demolition of the existing building at 200-214 6th Street, and new construction of nine-story mixed-use (residential-over-ground floor commercial) building.

After discussion, the HPC arrived at the comments below:

ALTERNATIVES

The Commission commented on the preservation alternative and questioned whether a partial preservation alternative could also be evaluated that utilizes the maximum allowed height and bulk for the project site.

**1,
AL-1**

The Commission also commented on the level of information of the preservation alternative. Specifically, the Commission noted that the environmental document should contain floor plans and additional architectural information (ie. dwelling unit mix, unit count, etc.) on the preservation alternative, in order to demonstrate whether or not the alternative fulfills the objectives and goals of the proposed project. Overall, the preservation alternative should be better developed to illustrate a viable reuse scheme.

**2,
AL-2**

NEW CONSTRUCTION

The Commission expressed support for the overall project, but noted that the design of the new construction does not appear to be compatible with the surrounding National-Register eligible historic district. Specifically, the new construction should draw from the adjacent historic buildings, and incorporate elements, including cornice lines, in order to reinforce the building's compatibility within the historic district. The Commission finds that the design of the project pursuant to the Secretary of the Interior's Standards for Rehabilitation could be refined to better demonstrate the project's compatibility with the surrounding eligible historic district.

**3,
CP-4**

ATTACHMENT 2

Transcript of the Public Hearing on the Draft EIR

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BEFORE THE SAN FRANCISCO PLANNING COMMISSION

200-214 6TH STREET (HAYSTON APARTMENT BUILDING)
AFFORDABLE HOUSING WITH GROUND-FLOOR RETAIL PROJECT

PUBLIC HEARING
ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

April 4, 2013

Item 14. 2011.0119E

Commission Chambers - Room 400
City Hall, 1 Dr. Carlton B. Goodlett Place
San Francisco, California

REPORTED BY: FREDDIE REPPOND, STENOGRAPHIC REPORTER

A P P E A R A N C E S

SAN FRANCISCO PLANNING COMMISSION:

Commissioner Rodney Fong, President

Commissioner Cindy Wu, Vice President

Commissioner Michael J. Antonini

Commissioner Gwyneth Borden

Commissioner Rich Hillis

Commissioner Kathrin Moore

Commissioner Hisashi Sugaya

PRESENTATION (BY SAN FRANCISCO PLANNING DEPARTMENT):

Rick Cooper, Senior Environmental Planner

Rachel Schuett, Environmental Planner

Rich Sucre, Historic Preservation Technical
Specialist,

---o0o---

1 Thursday, April 4, 2013 1:36 o'clock p.m.

2 ---o0o---

3 P R O C E E D I N G S

4 CLERK TO THE COMMISSION: Commissioners, that
5 will place you on Item 14 for Case No. 2011.119E at
6 200-214 6th Street, the Hayston Apartment Building
7 Affordable Housing with Ground-floor Retail Project
8 Draft EIR public hearing on the draft environmental
9 impact report.

10 Please note that written comments will be
11 accepted at the Planning Department until 5:00 p.m. on
12 April 15th, 2013.

13 MR. COOPER: Good afternoon, Commissioners.
14 Before we begin this item, I want to take this
15 opportunity to introduce you to a member of our staff
16 who has been with us for about two years. This will be
17 her first appearance before you.

18 Rachel Schuett came to us after having about
19 ten years of experience doing CEQA and NEPA projects for
20 a private consulting firm for about ten years and
21 previous to that received a BS in environmental
22 economics and policy from Cal. And since coming to our
23 department, she's performed extremely well and is making
24 a vital contribution to the work of the department and
25 the City.

1 So please join me in welcoming Rachel Schuett.

2 Thank you.

3 PRESIDENT FONG: Thank you.

4 MS. SCHUETT: Good afternoon, President Fong,
5 Members of the Commission. I'm Rachel Schuett, Planning
6 Department staff.

7 The item before you is the public hearing to
8 receive comments on the draft environmental impact
9 report, or draft EIR, for the 200-214 6th Street
10 Affordable Housing with Ground-floor Retail Project.
11 This is Case No. 2011.0119E.

12 I'm joined here today by my colleagues, Rich
13 Sucre, the staff historic preservation technical
14 specialist; and Rick Cooper, senior environmental
15 planner. Barbara Gualco is here on behalf of the
16 project sponsor, Mercy Housing; as well as Owen Kennerly
17 of Kennerly Architecture and Planning.

18 So the proposed project would include removal
19 of the defenestration art installation from the existing
20 building; demolition of the Hugo Hotel, which was
21 originally known as the Hayston Apartment Building,
22 which is located at the southwest corner of the
23 intersection of 6th and Howard Streets; the construction
24 of a new nine-story mixed-use building with retail on
25 the ground-floor and 67 affordable housing units

1 above -- and to note that 14 of these units would be
2 designated for developmentally disabled adults.

3 The Hugo Hotel has been identified as a
4 contributor to the 6th Street Lodging-House District,
5 which appears eligible for the National Register of
6 Historic Places. As a result, the draft EIR for this
7 project found that the demolition of the Hugo Hotel
8 would result in significant and unavoidable historic
9 resource impact.

10 I will also note that the historic resource
11 valuation and response prepared for the proposed project
12 also found the following: one, that the defenestration
13 art installation is considered to be superimposed upon
14 the building and is not considered an architectural
15 modification; therefore, the building and the art
16 installation should be evaluated separately.

17 Two, that the Hugo Hotel individually is not
18 an historic resource.

19 Three, that the defenestration art
20 installation is also not an historic resource and for
21 the construction of the proposed project building would
22 have less than significant impact on the historic
23 district since it is generally compatible with the
24 character of the district.

25 The EIR identified mitigation requiring

1 Historic American Building Survey documentation prior to
2 demolition of the building. However, this mitigation
3 does not reduce the impact to a less than significant
4 level.

5 The draft EIR also identified two potentially
6 significant impacts to cultural resources which will
7 reduce to a less than significant impact with
8 implementation of mitigation measures.

9 A hearing to receive the Historic Preservation
10 Commission's comments on the draft EIR was held on March
11 20th, 2013. At the hearing the HPC comments were
12 largely focused on a request to evaluate a partial
13 preservation alternative which would preserve at least
14 the exterior of the Hugo Hotel but would reconfigure the
15 interior to provide more units than the preservation
16 alternative that was evaluated in the EIR. Some
17 comments were also made on the project design.

18 I would like to remind all speakers that this
19 is not a hearing to consider approval or disapproval of
20 the proposed project. Approval hearings will follow our
21 final EIR certification. Your comments today should be
22 confined to the adequacy and accuracy of information and
23 analysis contained in the draft EIR. The comments will
24 be transcribed by the court reporter and responded to in
25 the responses-to-comments document. The document will

1 respond to all verbal and written comments received and
2 make revisions to the draft EIR as appropriate.

3 I would like to remind commenters also to
4 speak slowly and clearly so that the court reporter can
5 produce an accurate transcript of today's hearing.
6 Also, commenters should state their name and address for
7 the record so that they may be properly identified and
8 so that we may send them a copy of the
9 responses-to-comments document once it's completed.

10 After hearing comments from the general
11 public, we will also take any comments on the draft EIR
12 from the Planning Commission.

13 I will note that the public review period for
14 this draft EIR will begin on February 27th and will
15 continue until 5:00 p.m. on April 15th. Comments that
16 are not made verbally today should be submitted in
17 writing to the Planning Department.

18 So this concludes my presentation on this
19 matter. And unless the Commission has any questions, I
20 would respectfully suggest that the public hearing on
21 this item be opened.

22 PRESIDENT FONG: Thank you.

23 Is there any public comment on this item?

24 Seeing none, the public comment portion is closed.

25 Commissioner Sugaya.

1 COMMISSION SUGAYA: Yes. I have quite a few
2 comments here. No.

3 This is not a comment. I have a quick
4 question to staff about the date of the HPC hearing in
5 which they considered this.

6 RICH SUCRE: Rich Sucre, department staff.

7 COMMISSIONER SUGAYA: Give the date of the --

8 RICH SUCRE: Okay. The HPC actually heard it
9 on March 6th as well as on March 20th.

10 COMMISSIONER SUGAYA: Okay. Thank you.

11 I'll be submitting comments separately. They
12 have to do mainly with mitigation measures on the
13 historic resources. I think you need to augment them a
14 bit.

15 I'll just go ahead and say one thing. I
16 think, since the art piece is considered to be somewhat
17 important or recognized as such, I think that the
18 mitigation should include some kind of treatment of that
19 particular art piece. I know that the artist is around,
20 since it was carried in the paper yesterday or today.
21 So information is available. And if that could be
22 incorporated into some kind of exhibit, perhaps. And,
23 also, there probably should be an exhibit on the
24 building or inside the lobby or somewhere with respect
25 to the historic resource itself.

**1,
GC-1**

**2,
CP-1**

**3,
CP-2**

4,
CP-3

**5,
GC-2**

**6,
AL-1**

**7,
AL-2**

CERTIFICATE OF REPORTER

I, FREDDIE REPPOND, a duly authorized
Shorthand Reporter and licensed Notary Public, do hereby
certify that on the date indicated herein that the above
proceedings were taken down by me in stenotype and
thereafter transcribed into typewriting and that this
transcript is a true record of the said proceedings.

IN WITNESS WHEREOF I have hereunto set my hand
on this 9th day of April, 2013.

FREDDIE REPPOND

ATTACHMENT 3

Building Design Compatibility Analysis

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Design Compatibility Narrative:

200 Sixth Street: Mixed-Use, Affordable Family Housing

Project Sponsor: Mercy Housing California

Architects: Kennerly Architecture & Planning; Saida-Sullivan Design partners

BACKGROUND:

The Hugo Hotel and Sixth Street Lodging-house District

While the existing Hugo Hotel is a contributor to the National Register eligible Sixth Street Lodging-house District, Tim Kelley Consulting (TKC) has determined that it is not eligible for individual listing in the California Register of Historical Resources. Additionally, TKC has determined that the demolition of this one contributor “has a relatively minimal impact on the district, and does not materially alter in an adverse manner the physical characteristics that justify or account for it being listed in the National or California registers.”

The District was first identified and recorded by architectural historian Anne Bloomfield in 1997 on DPR 523 forms which describes the character of the District as follows:

“The Sixth Street Lodging-house District is a group of 33 low-budget residential hotels, or lodging-houses, built from 1906 through 1913, and a few low-rise commercial buildings...

19 or about 60%of the district buildings are unreinforced masonry structures; the rest are wood frame or concrete. Most are three or four stories tall, a few are five, one is seven, and two commercial structures are only one story. Ground floors are commercial, with minimal entrances to the single-room units.”

Evaluating the Impact of a Replacement Building

In describing a method to evaluate the impact of the replacement Building on the District, TKC cites the Secretary of the Interior’s Standards which recommends:

“Designing new exterior additions to historic buildings or adjacent new construction which is compatible with the historic character of the site and which preserves the historic relationship between the building or buildings and the landscape.”

Furthermore, the Secretary of the Interior’s Standards also state that:

“The new work shall 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.”

For a better understanding, we would also cite what the Secretary of the Interior's Standards do not recommend:

“Introducing new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color, and texture; which destroys historic relationships on the site; or hich damages or destroys important landscape features.”

History of Planning Department and HPC Interaction and Feedback

The Design Team and Project Sponsors have met with San Francisco Planning Department's Preservation Planning Staff, and on June 15, 2011 met with the Architecture Review Committee (ARC) of the Historic Preservation Commission (HPC) to review the preliminary proposed design. The notes issued on June 30 expressed support for the project:

“Overall, the ARC is in support of the design and found aspects of the project to be compatible with the eligible 6th Street Lodging-house Historic District, including the massing, height, corner articulation, material palette (brick, concrete, limestone, terracotta, and metal), and the tall storefront height and articulation.”

However, the ARC also requested further refinements to make the design more compatible with the District. The Design Team has since made numerous refinements and changes to the design in response to these comments. Among these included straightening the Howard street façade, and organizing the Sixth street façade into simpler repetitive openings.

Since this hearing, both these ideas have been incorporated into the design. Additionally, glazing areas have been reduced and exposed concrete slab edges eliminated, both replaced with additional brick veneer that is now enriched through texture and varied coursing (see below).

DESIGN COMPATIBILITY

The Proposed Project’s design approach begins with the three dominant aspects of the district: Use (affordable housing over retail); continuous retail street frontage; and varied building heights and massing that give scale and rhythm to Sixth street.

The following aspects of the Proposed Design correspond to character-defining attributes of the district as outlined by the Secretary of the Interior Standards, Bloomfield et al., and further by TKC in the Historic Resource Evaluation.

Simple Rectangular Massing

The massing concept creates two simple rectangular volumes of different heights separated by recessed façade areas. The taller volume marks the corner and the scale of each is compatible with the adjacent district even though the combined overall building is larger than its neighbors.

Size, Scale, and Proportion

The two-volume Massing Design modulates the overall size, scale and proportion of the new building and its constituent volumes making them harmonious with the fine grain and varied silhouette of Sixth Street. Although the subject property has an anomalously long 125’ frontage on Sixth Street, dividing this face into two stepping volumes creates a composition and profile similar to the ensemble of buildings across Howard Street including the taller Dudley Hotel.

Uniform Height of Continuous Commercial Storefront

The tall storefront extends the existing pattern of retail frontages down Sixth Street and around the corner onto Howard. This transparent base rises two full floors and is capped by a strong datum separating it from the masonry volumes above. This expression integrates the retail, the residential lobby and community room.

Material and Texture

Each of the two primary building volumes in the proposed design will be clad in a different tone of brick veneer. Taking cues from older masonry buildings in the district and along Market street, the brick will be set in courses of different thicknesses offering texture and subtle shadow lines on the Howard street volume. Soldier courses of brick on the Sixth street volume articulate floors and lintels across window and balcony alcoves. Exposed structural concrete fin-walls bracket these volumes at the blind-walls and at the transition between them along Sixth Street.

Prominent Cornice Lines

Each primary building volume features an articulated, painted steel roof cornice. On Sixth Street, this element is integrated with the roof-deck guardrail and wind-screen design. On Howard Street, this element extends back over the building to become the mechanical Penthouse roof.

Fenestration

Among, the contributory historic resources along Sixth Street, there are two typologies of fenestration: deeply recessed windows set in masonry facades, and flush, articulated windows set in projecting bays clad in painted wood or sheet-metal. The proposed design features deeply recessed windows within the brick façades. In the corner volume, these are grouped in one, two, and three story orders that shift laterally in a regular alternating rhythm. These compositional devices relieve the sense of scale and the potentially relentless repetition of windows on a nine-story façade. Along Sixth Street, the windows are organized in the same vertical groupings and recessed into brick surrounds that alternate with balcony alcoves.

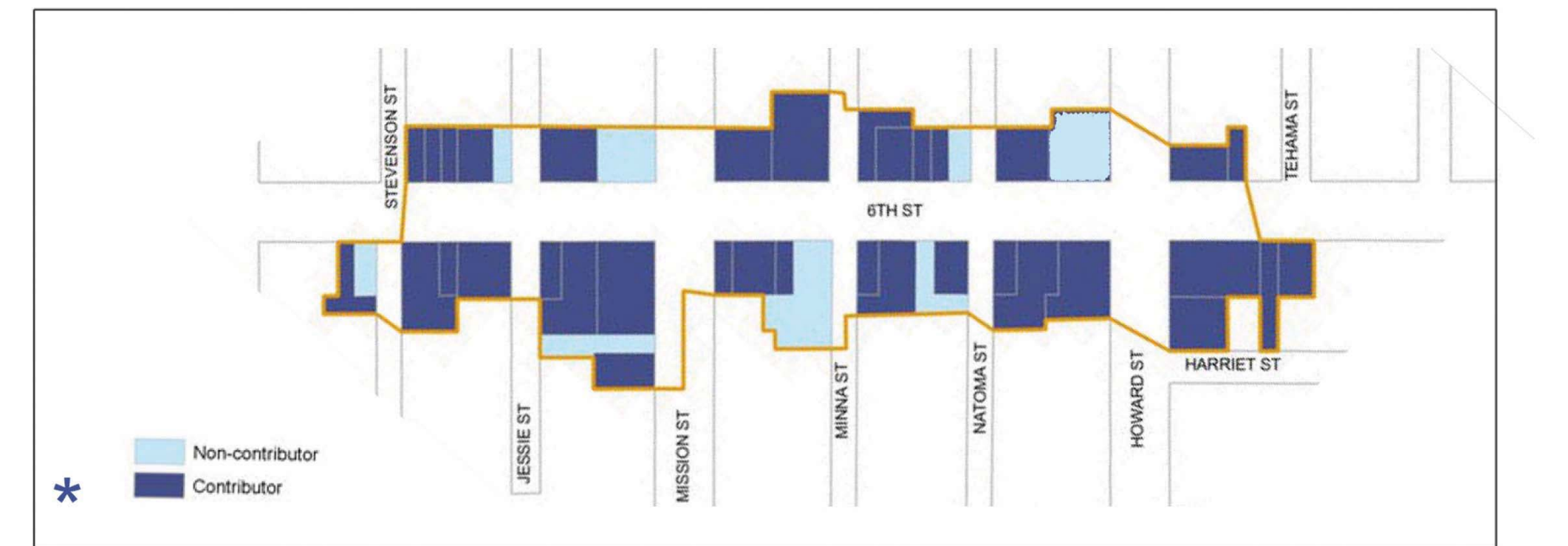
The multi-story window groupings are common among numerous historic resources in the District. It is a Beaux-Arts compositional device that mitigates the repetitious effect of multi-story buildings, and offers multiple readings of a building’s scale and proportion. It is deployed on the Orlando Hotel, The Kean Hotel, and the Henry Hotel among others – all of which place a single story row of windows above the storefront with two, three or four story groupings above that. In the Proposed Design, the single-story course of windows above the retail creates a break in scale between these high bay spaces below and the residential building above. This pattern is replicated on the Proposed Design. Additionally, with smaller floor-to-floor dimensions than in many older buildings, the grouping of windows in the Proposed Design enables a scale and proportion more in sync with the older buildings.



6TH STREET WEST FACING ELEVATION



EXISTING HUGO HOTEL



SIXTH STREET LODGINGHOUSE DISTRICT



6TH STREET EAST FACING ELEVATION









Sixth Street Elevation



Howard Street Elevation