



SAN FRANCISCO PLANNING DEPARTMENT

DATE: June 12, 2014
TO: Planning Commission
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RE: Draft Preservation Element of the General Plan

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PROJECT SUMMARY

The Preservation Element will be a new Element added to the General Plan. A Preservation Element is a document that outlines preservation-related goals to guide a community's efforts in protecting its cultural resources. It describes the various components of an effective historic preservation program and serves as a useful roadmap for charting future progress. A Preservation Element is intended to establish a long-range vision for the protection of historic resources in a jurisdiction. It sets forth a series of goals, objectives, and policies to accomplish that vision over time.

THE GENERAL PLAN AND EXISTING HISTORIC PRESERVATION POLICIES

The San Francisco Charter requires "the city planning commission to adopt and maintain including necessary changes therein, a comprehensive, long-term, general plan for the improvement and future development of the city and county to be known as the master plan....." State law requires that the Master Plan or General Plan address seven issues: land use, circulation, housing, conservation, open space, noise and safety. Additional Elements can be added.

The San Francisco General Plan contains the following elements: Housing, Commerce and Industry, Recreation and Open Space, Transportation, Urban Design, Environmental Protection, Community Facilities, Community Safety, Arts and Air Quality. San Francisco generally updates their Elements one at a time. Currently, in addition to the Recreation and Open Space Element, the Housing Element and Transportation Element are in the very early stages of being updated.

Each Element focuses on its main purpose; e.g. the housing element focuses on the need to meet the housing requirements of all economic segments of the community. However, there is obvious cross-referencing between Elements on numerous subject matters. In the case of historic preservation, the Housing Element has two policies related to historic preservation (Policies 11.7 and 11.9), the Community Safety Element has one policy (Policy 3.1), the Commerce and Industry Element has one policy (Policy 6.8), and the Urban Design Element is currently where most of the historic preservation policies reside (Policies 2.4-2.7). See Attachment A for the full text of these policies.

PROJECT BACKGROUND

Currently, the San Francisco General Plan currently contains no Preservation Element (Element). Numerous drafts of this Element have been produced, beginning around 1987, but none have been

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adopted. The attached document is based on previous draft documents and incorporates comments by stakeholders including members of the public, preservation organizations, and developers generated in the summer and fall of 2007. The Planning Department (Department) conducted evening workshops, drop-in clinics, and public informational meetings in order to garner input from the public.

At the November 7, 2007 Landmarks Preservation Advisory Board (LPAB) hearing, the Department sought comments from the LPAB and members of the public in order to inform a final draft Element. The attached draft document was produced by Architectural Resources Group (ARG) and was informed by previous drafts and input from stakeholders including the former LPAB and the public. The approach taken by ARG to responding to comments and public input is outlined in the attached summary table of comments and responses.

At its June 3, 2009 hearing the Historic Preservation Commission (HPC) endorsed the draft Element with the following comments: elimination of the sentence in the 2nd paragraph under History, or, put in a sentence that characterizes the status of African American in San Francisco prior to 1906; under Benefits of Historic Preservation - put in inherent value of historic properties of artistic significance; under Cultural Benefits - add the importance of cultural continuity; and mention the inherent value of great quality work to culture as a whole; under Objective 4 and Policy 4.2, use the appropriate level of the Secretary of Interior guidelines.

Funding for the draft Element was budgeted in the Department's 2008-2009 Work Plan to be completed by June, 2009. Due to budget cuts in the 2009-2010 fiscal year, the Department did not have funds to continue work on the Preservation Element. The Department's proposed 2014-2016 budget includes \$50,000 allocated to a professional service contract for environmental review. Assuming this item is approved we will move forward with the project in the upcoming fiscal year. The appropriate level of environmental review has not yet been determined.

In the meantime, the Department requests review and comment by the Planning Commission on the draft Element in its current form in order to bring the document as close to a final document prior to pursuing environmental review. Specifically, staff expects to update the draft to address recent amendments to Article 10 and 11 of the Planning Code, recent developments in the City's Historic Preservation Program, and new language for consistency with recent updates to other elements of the General Plan. At the April 16, 2014 hearing, the HPC directed staff to schedule three HPC hearings to review the Draft Element in parts to aid in preparation of a final draft for CEQA review. This first hearing to be held on June 18 will focus on Objectives 1-3, and the subsequent two hearings will focus on Objectives 4-9.

DEPARTMENT ANALYSIS

The recommendations below are not exhaustive and are intended to initiate a discussion with the Planning Commission on the final edits for the draft Element prior to public outreach and environmental review:

1. Overall the Element should be updated to reflect developments in the City's current Historic Preservation Program. For example, Policy 1.8 on page 26 refers to a City Register of Historic

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Resources, but a Register was considered and rejected for inclusion in the Article 10 amendments. Also, Policy 5.1 is now redundant with the new City Charter.

2. There are several policies that require HPC and Department input in order to respond to the public comments collected in 2007 (highlighted in yellow in attachment C).
3. There is overlap in Policies 1.6 and 2.4 on pages 25 and 28. As drafted, this could lead to some confusion since both refer to recent past historic resources.
4. Policy 2.6 on page 29 makes no reference to supporting efforts to designate under Article 11 of the Planning Code, which should be included as well.
5. The Element should include clearer language under Objective 4 on pages 33-34 about the application of the Secretary of the Interior's Standards and managing change to historic resources.
6. The Element should include a separate policy or policies regarding accessibility and life-safety work, such as seismic upgrades under Objective 4 on page 33.
7. There are several policies with considerable overlap which we believe can be combined, such as Policies 5.4 and 5.5 on page 36.
8. There are a couple policies that do not appear to be necessary, such as policies 5.6 and 5.8 on pages 36 and 37. All staff and decision-makers are required to apply the policies and make findings consistent with the General Plan once adopted. The Element must be consistent with the General Plan before adoption.
9. Policies under Objective 6 on page 37 should be updated to address a broad range of financial- and process-related incentives as well as City education and technical guidance for historic preservation projects.
10. Policies under Objective 7 on page 38 should be updated to address innovative techniques to promote awareness, appreciation, and participation in historic preservation.
11. Policies under Objective 8 on page 39 should include our current understanding of the connection between sustainability and historic preservation from an individual building to district level.
12. The Element should include a separate policy regarding the identification and treatment of social and cultural resources, such as the survey work completed in the Japantown neighborhood.
13. The Element makes a number of references to the California Environmental Quality Act (CEQA) as playing a significant role in the Department's preservation-related work. Policies in the Element should acknowledge the City's and the HPC's responsibilities for environmental review; however, the number of specific CEQA references, especially those that do not provide guidance, should be removed. For instance,
 - a. Policy 4.1 on page 34 states, "Under the California Environmental Quality Act (CEQA) review, projects that are in compliance with The Standards are generally deemed to have a less-than-significant impact on historic resources. The Standards have been

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adopted by landmark commissions and planning commissions throughout the country.”

- b. Policy 3.2 specifically references sections of the statute that may change in the future.

NEXT STEPS

The HPC will be holding two (2) additional hearings to review Objectives 4-9 of the Draft Preservation Element. The hearings will be followed by a public Open House in September that will provide additional opportunities to provide input on the document. The Department will also present the document to community stakeholders during a rigorous public outreach campaign in Winter 2014. The document will be revised based on public feedback. A final draft will be prepared for environmental review pursuant to CEQA. At the conclusion of the environmental review, the final policy document will be presented for endorsement by the Historic Preservation Commission and the City Planning Commission. Adoption by the Board of Supervisors is expected to take place in 2015.

UPCOMING EVENTS

- | | |
|--------------------|---|
| July 16, 2014 | HPC Review & Comment Hearing: Objectives 4-6
City Hall, Rm 400, 12:30pm |
| August 20, 2014 | HPC Review and Comment Hearing: Objectives 7-9
City Hall, Rm 400, 12:30pm |
| September 10, 2014 | Open House for the Draft Preservation Element
The Old Mint, 88 5th St, 6:00-7:30pm |

ATTACHMENTS

- Attachment A: Historic Preservation Policies within the General Plan
- Attachment B: Draft Preservation Element
- Attachment C: Synthesis of 2007 Draft Preservation Element Comments

ATTACHMENT A:

EXISTING PRESERVATION POLICIES IN THE GENERAL PLAN

Housing Element Policies

POLICY 11.7

Respect San Francisco's historic fabric, by preserving landmark buildings and ensuring consistency with historic districts.

Landmarks and historic buildings are important to the character and quality of the City's neighborhoods and are also important housing resources. A number of these structures contain housing units particularly suitable for larger households and families with children.

New buildings adjacent to or with the potential to visually impact historic contexts or structures should be designed to complement the character and scale of their environs. The new and old can stand next to one another with pleasing effects, but only if there is a successful transition in scale, building form and proportion, detail, and materials.

POLICY 11.9

Foster development that strengthens local culture sense of place and history.

In addition to the factors discussed above, including physical design, land use, scale, and landmark elements, neighborhood character is also defined by long-standing heritage, community assets, institutional and social characteristics. Maintaining the linkages that such elements bring, by connecting residents to their past, can contribute to the distinctiveness of community character and unique sense of place; as well as foster community pride and participation.

Elements of community heritage can include the public realm, including open space and streets; and the built environment, institutions, markets, businesses that serve local needs, and special sites. Other, non-physical aspects can include ethnicity, language, and local traditions. Development of new housing should consider all of these factors, and how they can aide in connecting to them. Housing types that relate to the community served, particularly the income, household and tenure type of the community, can help to address negative changes in socioeconomic conditions, and reduce displacement. Constructing housing that includes community components that build upon this sense of place, such as public plazas, libraries, community facilities, public art, and open spaces, can build a stronger sense of community

Attachment A: Existing Preservation Policies in the General Plan

heritage. And the development of neighborhood-specific design guidelines, as discussed above, should review local neighborhood characteristics that contribute to and define its character beyond the physical.

Historically, neighborhoods in San Francisco have become identified with certain cultural groups, including ethnic-communities that have settled within corridors or areas of larger neighborhoods. It is important to recognize, however, that local culture is not static- San Francisco's cultural character and composition have shifted as social, ethnic, and political groups have moved across the City's landscape. Plans and programs, including housing developments, need to recognize the duality of changing environments when they occur, and work to both preserve the old while embracing the new.

Community Safety Element Policies

POLICY 3.11

Ensure historic resources are protected in the aftermath of a disaster.

Preservation of the City's historic resources is an immediate concern when damage is being assessed. The older construction techniques of historic buildings make them more vulnerable to damage, and if the damage is noted without recognition of the resources historic value, the building can be at risk of further damage or demolition. Accurate information about heritage resources is fundamental to ensuring resources are not lost. Complete survey information ensures that resource documentation of relevant buildings exists, and this information can be mapped and used by assessors in the tagging of buildings post-disaster. Since the year 2000, the Planning Department has been actively engaged in survey work through the Citywide Survey Program. The focus of the program is on neighborhoods that are undergoing long-range planning efforts or are the focus of intense development activity, but the Citywide Survey Program will continue survey efforts in neighborhoods outside of Area Plan study areas as resources become available. While that Citywide Survey is underway, the City should make use of existing survey information, including privately developed property reviews, and ensure it is made available to DBI and any other relevant contractors who may be charged with doing evaluations of damaged buildings. Post-disaster assessment should include an analysis of the extent of the damage to historic areas and resources. In a typical assessment scenario, assessors will attach a green tag if a building is structurally sound, a yellow tag where repairs are needed, and a red tag if the structure is uninhabitable. This system should ensure sufficient protection for historic resources post-disaster, in that all tagged buildings receive further detailed evaluation considering survey information before any steps towards demolition are taken. The system could also include separate placards identifying the building as a historic resource. Without such identification, the buildings are at risk.

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Commerce and Industry Element

POLICY 6.8

Preserve historically and/or architecturally important buildings or groups of buildings in neighborhood commercial districts.

Most neighborhood shopping streets are closely linked to the history of San Francisco and contain structures and features which document certain periods or events. A few of these buildings are designated landmarks while others may qualify as architecturally or historically significant or contributory buildings but have not yet been nominated. Some of the landmarks on shopping streets are commercial buildings as, for example, the Castro Theater on Castro Street, while others are institutions such as St. Francis of Assisi Church in North Beach or South San Francisco Opera House near Third Street. Only one existing historical district, the Liberty Hill Historic District, overlaps with a section of a neighborhood shopping street, Valencia Street. No other neighborhood commercial area has yet been designated a historical or conservation district although many contain examples of fine architecture and historic buildings and might in whole or in part qualify as districts.

Many of San Francisco's neighborhood shopping areas were developed during the first half of this century and, in many cases, their growth is linked to the evolution of street car lines. Small stores for retail and services clustered along thoroughfares with street car service. As more residential development occurred around them, they attracted more and more businesses and, over time became the intensely developed, active shopping streets we know today. Due to their gradual development over several decades and replacement of old buildings with new structures, most districts do not have a uniform architectural style but are composed of buildings originating in various periods. They range from Victorian, Edwardian, Art Deco and International Style to plain, functional architecture of the post-war period. The few architecturally uniform shopping areas are the small shopping centers and a few commercial blocks which were built in the forties and fifties in the western and south-western neighborhoods, often as part of large residential tract development.

A common feature of the older neighborhood shopping areas is the prevalent small-scale development which is based on the small lot pattern of blocks which mainly were intended for residential development. During the first half of the century, in cases where several lots were merged for larger commercial development, builders avoided the appearance of massive buildings by articulating the facades to resemble a series of buildings. Unfortunately, the concern about compatibility of scale was neglected in the sixties and seventies when large enterprises, especially financial institutions, developed imposing, out-of-scale buildings and disturbed the existing small-scale environment.

Another common feature of San Francisco's shopping streets is the commercial-residential mixed use of

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the buildings. In the last century, many storekeepers lived above their stores as was customary in European countries. This established the pattern of developing commercial units with residential flats on the upper floors. It was not until the forties and fifties, that single-story commercial development became more common in the single-family residential areas in the western and south-western part of the city.

Many historically and/or architecturally significant buildings or groups of buildings on neighborhood shopping streets already have been identified through the work of the Landmarks Advisory Board, in the 1976 DCP architectural survey, and in special surveys such as the studies of Union Street and North Beach. These surveys should be systematized and extended to all neighborhood shopping streets. Those streets or parts of streets whose built environment represents an important historic period or are of outstanding architectural or aesthetic quality should be protected as historic or conservation districts. Those important buildings that are not part of a larger grouping should be protected as individual landmarks.

Pending formal designation of districts and individual landmarks, these important buildings and groups of buildings should be protected, where feasible, by application of the following guidelines which are intended to protect and enhance the distinguished character of neighborhood shopping streets and to further the preservation of historically and/or architecturally significant structures and features.

CONSERVATION GUIDELINES	
<ul style="list-style-type: none"> • The demolition of historically and/or architecturally important buildings should be avoided and their restoration should be encouraged. Buildings of lesser importance which nevertheless contribute to the character of the street, also should be retained and enhanced if feasible. 	<ul style="list-style-type: none"> • Signs on historically or architecturally important buildings should be designed as an integral part of the building and not detract from the architecture. All new signs, including business signs and billboards should be compatible with the existing scale of the district and be carefully designed not to upset the character of the district.
<ul style="list-style-type: none"> • In renovating such structures, the design of the original structure should be respected. Renovation efforts should be guided by the policies of the Urban Design and Preservation Elements and Standards for Rehabilitation of the Secretary of the Interior. 	<ul style="list-style-type: none"> • Positive urban design elements of the streetscape such as the proportion of street and sidewalk to adjacent building heights, landscaping and street trees, artwork and street furniture should be preserved and enhanced with the goal of maintaining and improving the established character and yet allowing the many functions of a neighborhood

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<ul style="list-style-type: none"> Alterations and additions to any historically or architecturally important building should be compatible with the original building and not diminish its character. If original building components cannot be restored, contemporary design which respects the scale, detailing, material and color of the original structure, is permissible. Where possible, special attention should be paid to restoration of original storefronts as they are essential components of neighborhood shopping areas. 	<p>oriented, commercial area to be carried out in a pleasant and attractive environment.</p>
<ul style="list-style-type: none"> Business signs are important features in neighborhood commercial areas. Distinguished old signs, especially those identifying historic businesses and landmark buildings should be preserved. Old signs painted directly on walls should be preserved and not be painted over if they are of historic or aesthetic quality. 	<ul style="list-style-type: none"> New development near buildings of historic or architectural importance should harmonize with the historic fabric. Slavish imitation of historic styles should be avoided and innovative new architecture which contributes positively to the established urban design character of the district, encouraged. The design of new structures should establish linkages with design characteristics of the surrounding buildings such as building height, massing, height of stories, window proportions and framing, material and color, horizontal and vertical articulation, set-backs, stairs and other design elements.
	<ul style="list-style-type: none"> New development in historic or conservation districts, should respect the existing development pattern and scale, height of adjacent buildings, open space corridors in the interior of the block, facade design and rhythm, and special features characteristic of buildings in the particular district.

Urban Design Element

POLICY 2.4

Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.

Older buildings that have significant historical associations, distinctive design or characteristics exemplifying the best in past styles of development should be permanently preserved. The efforts of the Landmarks Preservation Advisory Board should be supported and strengthened, and a continuing search should be made for new means to make landmarks preservation practical both physically and financially.

Criteria for judgment of historic value and design excellence should be more fully developed, with attention both to individual buildings and to areas or districts. Efforts for preservation of the character of

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these landmarks should extend to their surroundings as well. Preservation measures should not, however, be entirely bound by hard-and-fast rules and labels, since to some degree all older structures of merit are worthy of preservation and public attention. Therefore, various kinds and degrees of recognition are required, and the success of the preservation program will depend upon the broad interest and involvement of property owners, improvement associations and the public at large.

**POLICY 2.5
Use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings.**

Although the Landmarks Preservation Advisory Board and other agencies have certain powers relative to the exterior remodeling of designated landmarks, the problem of detrimental remodelings is far broader. The character and style of older buildings of all types and degrees of merit can be needlessly hidden and diminished by misguided improvements. Architectural advice, and where necessary and feasible the assistance of public programs, should be sought in order to assure that the richness of the original design and its materials and details will be restored. Care in remodelings should be exercised in both residential and commercial areas. Along commercial streets, the signs placed on building facades must be in keeping with the style and scale of the buildings and street, and must not interfere with architectural lines and details. Compatible signs require the skills of architects and graphics designers. In commercial areas as well as residential neighborhoods, the interest and participation of property owners and occupants should be enlisted in these efforts to retain and improve design quality.

**POLICY 2.6
Respect the character of older development nearby in the design of new buildings.**

Similar care should be exercised in the design of new buildings to be constructed near historic landmarks and in older areas of established character. The new and old can stand next to one another with pleasing effects, but only if there is a similarity or successful transition in scale, building form and proportion. The detail, texture, color and materials of the old should be repeated or complemented by the new.

Often, as in the downtown area and many district centers, existing buildings provide strong facades that give continuous enclosure to the street space or to public plazas. This established character should also be respected. In some cases, formal height limits and other building controls may be required to assure that prevailing heights or building lines or the dominance of certain buildings and features will not be broken by new construction.

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**POLICY 2.7
Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character.**

All areas of San Francisco contribute in some degree to the visual form and image of the city. All require recognition and protection of their significant positive assets. Some areas may be more fortunately endowed than others, however, with unique characteristics for which the city is famous in the world at large. Where areas are so outstanding, they ought to be specially recognized in urban design planning and protected, if the need arises, from inconsistent new development that might upset their unique character.

These areas do not have buildings of uniform age and distinction, or individual features that can be readily singled out for preservation. It is the combination and eloquent interplay of buildings, landscaping, topography and other attributes that makes them outstanding. For that reason, special review of building proposals may be required to assure consistency with the basic character and scale of the area. Furthermore, the participation of neighborhood associations in these areas in a cooperative effort to maintain the established character, beyond the scope of public regulation, is essential to the long-term image of the areas and the city.

*Preservation Element***PREAMBLE**

San Francisco is widely acclaimed for its union of a stunning natural landscape and unique and attractive built environment. Historic resources are an integral part of this environment, which distinguishes San Francisco from other places and contributes to its socioeconomic and cultural well-being. San Francisco's historically, architecturally, and culturally distinctive buildings, neighborhoods and landscapes make San Francisco a desirable place for residents, businesses, and visitors alike.

Preservation of the City's historic resources benefits the community in several ways. Retention of its physical heritage gives the City character and beauty and makes it culturally richer for having tangible connections to its roots and development. Preservation also encourages community pride and awareness of local historic resources.

Preservation has a variety of practical benefits. Maintaining and rehabilitating historic resources and neighborhoods can mean savings in energy, time, money, and materials. Historic preservation through the rehabilitation and reuse of existing buildings is an intrinsically sustainable building practice compared to demolition. Preservation of historic resources can increase property values and tax revenues, and preservation is frequently a catalyst for neighborhood revitalization. Preservation also increases opportunities for heritage tourism and helps maintain a diversified housing stock.

In addition, a well-defined planning approach to the protection of historic buildings helps to streamline environmental review by informing project-specific identification and evaluation efforts and providing project proponents with baseline information regarding their properties before and during the permit review process.

INTRODUCTION

The Preservation Element has been created with the belief that the preservation of historic resources is essential to maintaining the character of the City of San Francisco. Historic resources are often affected by development projects, and historic preservation is a strategy for conserving significant elements of the built environment while allowing for growth and change to occur. San Francisco residents and community organizations have a long-standing commitment to historic preservation as one of the important contributors to the quality of life in San Francisco. Their activities have resulted in preservation emerging as a central value of citizens and government alike, and they have shaped San Francisco's planning and community development policies.

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The City's commitment to historic preservation is codified generally in Section 101.1 of the Planning Code, which sets forth eight Priority Policies, including Policy 7: *That landmarks and historic buildings be preserved.*

The purpose of the Preservation Element of the San Francisco General Plan is to provide background information related to historic preservation and to outline a comprehensive set of objectives and policies for the preservation and enhancement of San Francisco's historic resources. Historic resources include buildings, sites, structures, cultural landscapes, districts, and objects that are historically and/or archaeologically significant.

The Background section of the Preservation Element includes

- Legal Basis: Federal, State, and San Francisco Contexts
- Relationship to Land Use Planning
- Historic Preservation in San Francisco
- Overview of San Francisco's Historical Development
- Historic Resource Survey Program
- Benefits of Historic Preservation
- Incentives

The Preservation Element includes Objectives and Policies covering the following topics

- *Maintain a Complete Inventory of Historic Resources*
- *Protect and Preserve Historic Resources*
- *Preserve Archaeological Resources within San Francisco as an Irreplaceable Record of the Past*
- *Ensure That Changes in San Francisco's Built Environment Respect the Historical Character and Heritage of the City*
- *Integrate Preservation Goals Into the Land Use Decision-Making Process*
- *Promote Historic Preservation Through Incentives and Guidance*
- *Foster Public Awareness and Appreciation of San Francisco's Historic Resources and the Benefits of Historic Preservation*
- *Promote Historic Preservation as a Key Strategy in Adhering to the Principles of Sustainability for the Built Environment*
- *Prepare Historic Resources for Disasters and Develop Emergency Preparedness and Response Plans That Consider These Resources*

A Glossary of Terms is attached. Additional information on a wide range of topics related to preservation in San Francisco can be found in the Planning Department's Preservation Bulletin series available on the Planning Department's website or at the Planning Information Center.

BACKGROUND

Legal Basis

Federal Regulatory Framework

The National Historic Preservation Act (NHPA) of 1966 established a number of programs that deal with historic preservation at the federal and state levels. The National Register of Historic Places, maintained by the National Park Service (which is part of the U.S. Department of the Interior), was created as a federal planning tool and contains a list of national, state, and local "districts, sites, buildings, structures and objects significant in American history, architecture, archaeology, engineering and culture." In addition, the NHPA created the Advisory Council on Historic Preservation, an independent federal agency that: serves as the primary federal policy advisor to the President and Congress; recommends administrative and legislative improvements for protecting our nation's heritage; advocates full consideration of historic values in federal decision making; and reviews federal programs and policies to promote effectiveness, coordination, and consistency with national preservation policies. The NHPA also established the review process known as Section 106, in which federal undertakings must be assessed for potential impact on historic resources. In addition, Section 4(f) of the 1966 Department of Transportation Act requires transportation officials to consider the protection of historic properties in planning their projects.

Both the National Environmental Policy Act (NEPA) of 1969 and the California Environmental Quality Act (CEQA) of 1970 similarly require consideration of a project's potential effects on historical, architectural, and archaeological resources as part of the environmental review process. The Secretary of the Interior developed *The Secretary of the Interior's Standards for Historic Preservation Projects* in 1976 (revised 1992 and re-titled *The Secretary of the Interior's Standards for the Treatment of Historic Properties (The Standards)* and released *The Secretary of the Interior's Standards and Guidelines for Preservation Planning* in 1983. The *Guidelines for the Treatment of Cultural Landscapes* (1992) illustrates how to apply these treatments to cultural landscapes in a way that meets *The Standards*. These standards are used at all levels of government and under CEQA to guide appropriate preservation strategies.

Over the past twenty years or so, under the leadership of the National Park Service, the process and method of identifying and evaluating historic properties has evolved. In the past, historic significance was seen to derive from individual architectural merit and association with a fairly narrow conception of history's prominent individuals. Today, significance assessments are more expansive, evaluating a wider array of histories—social history, ethnic history, neighborhood history, economic history—and a wider array of resource types, in order to assess historic significance. As part of this approach, more attention is typically given today to understanding a resource's context, instead of evaluating it in isolation.

State Regulatory Framework

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The State of California Office of Historic Preservation (OHP) administers the California Register of Historical Resources program. As a recipient of federal funding, that office must meet the requirements of the National Historic Preservation Act with a State Historic Preservation Officer who enforces a designation and protection process, leads a qualified historic preservation review commission, maintains a system for surveys and inventories, and provides for adequate public participation in the OHP's activities. Most nominations to the National Register of Historic Places are processed through the California State Historical Resources Commission, and staff of the OHP participates in the federal review processes for Section 106 and Tax Act for Certified Rehabilitation projects. As the recipient of federal funds that require pass-through funding to local governments, the OHP administers the Certified Local Government (CLG) program for the state. The OHP also administers the California Registered Historical Landmarks and California Points of Historical Interest programs.

The California Environmental Quality Act (CEQA) is the foundation of environmental policy and law in the state of California, and encourages the protection of all aspects of the environment, including historic resources. Under CEQA, state and local governmental agencies must consider the impact proposed projects have on historic resources and archaeological sites. The CEQA review process identifies potential significant impacts as well as alternatives or mitigation measures to avoid or reduce these impacts. Properties listed in or determined eligible for the California Register of Historical Resources are subject to the CEQA review process. The California Register also includes properties listed in the National Register of Historic Places.

State agencies are further regulated under Public Resources Code Section 5024 and Governor's Executive Order W-26-92, both of which address preservation requirements for state-owned or controlled historic resources.

State law requires that each city and county adopt a General Plan containing the following seven components or "elements": land use, circulation, housing, conservation, open-space, noise, and safety (Government Code Sections 65300 et seq.). Although a preservation element is not required under state law, the OHP recommends that every Certified Local Government (such as San Francisco) include a preservation element in its General Plan.

San Francisco Regulatory Framework

The legal framework for Historic Preservation in San Francisco was established in 1967 with the adoption of Article 10 of the Planning Code. The ordinance provides for the designation of local landmarks and historic districts, which are listed in the appendices to Article 10. Among other protections, Article 10 allows the City to delay the demolition of individually designated landmark buildings for a period of up to one year to allow consideration of alternatives that could preserve the structure.

Article 10 also sets forth the City's requirements for a qualified historic preservation review commission. Article 10 initially created the Landmarks Preservation Advisory Board (Landmarks Board), a nine-member body appointed by the Mayor. In November 2008, voters approved a

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charter amendment to create a new seven-member Historic Preservation Commission expanding the powers of the existing Landmarks Board. (See Policy 5.1 for more detail.)

In 1985, Article 11 of the Planning Code was created as an outgrowth of the Downtown Plan. The Plan, in turn, was informed by a historic resource survey of downtown completed by the non-profit group San Francisco Architectural Heritage, the results of which were documented in the book *Splendid Survivors*, published in 1979. The Downtown Plan surveyed and classified all downtown buildings and recognized 539 important buildings in the downtown zoning districts. Of those, 350 were designated "Significant," meaning their loss would constitute an irreplaceable loss to the quality and character of the downtown. It also established six conservation districts. All of these resources findings are codified under Article 11.

One of the Downtown Plan's innovations is a system for the transfer of development rights (TDR), which permits owners of significant and contributory buildings to transfer unused development potential away from preserved buildings to other sites within the downtown zoning districts. Since 1985, other American cities have incorporated many of the innovative planning tools adopted in the Downtown Area Plan and Article 11, including the Transfer of Development Rights strategy, to preserve and protect significant historic resources.

The General Plan's introduction incorporates a 1986 voter-approved initiative that added Section 101.1 to the Planning Code. This preamble to the Planning Code is composed of eight Priority Policies, including Policy 7: *That landmarks and historic buildings be preserved.*

Relation to Other Plan Elements of the General Plan

References to historic preservation are found in other Elements of the General Plan. Policy 3.6 of the Housing Element involves the preservation of landmark and historic residential buildings as a number of these structures contain housing units particularly suitable for larger households and families with children.

Historic preservation is included in San Francisco's Urban Design Element of the General Plan, which contains general principles about the physical form of the City. One of these principles is "Conservation of resources which provide a sense of nature, continuity with the past and freedom from overcrowding." Policies include "Preserve notable landmarks and areas of historic, architectural or aesthetic value and promote the preservation of other buildings and features that provide continuity with past development." The Urban Design Element observes "as the city grows, the keeping of that which is old and irreplaceable may be as much a measure of human achievement as the building of the new. Certainly, the old should not be replaced unless what is new is better." Specific policies of the Urban Design Element which address historic structures are Policy 2.4, Policy 2.5, Policy 2.6, Policy 2.7 and Policy 3.1.

The Community Safety Element of the General Plan addresses existing structures and their performance in earthquakes. For example, Policy 2.4 calls for the continuation of the unreinforced masonry program and the parapet program. Policy 2.8 is to *"preserve, consistent*

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with life safety considerations, the architectural character of buildings and structures important to the unique visual image of San Francisco, and increase the likelihood that architecturally and historically valuable structures will survive future earthquakes.” This policy states that the City needs to achieve the related goals of increasing life safety and preserving historic structures for future generations by increasing their ability to withstand earthquake forces.

The Arts Element touches on the topic of Historic Preservation through the policies of Objective VI-1. This Objective and corresponding policies seek to support the continued development and preservation of artists’ and arts organizations’ spaces by preserving existing performing spaces in San Francisco and insuring the active participation of artists and arts organizations in the planning and use of decommissioned military facilities in San Francisco. It is also a policy to protect, maintain and preserve existing artwork in the City Collection which is part of a landmark or other structure, such as the murals in Coit Tower (Telegraph Hill), the Mothers Building (Zoological Gardens), and the Beach Chalet (Golden Gate Park murals).

The Commerce and Industry Element has little reference to Historic Preservation or existing buildings, though Objective 4 calls for improving the viability of existing industry in the City and the attractiveness of a City as a location for new industry. Under Objective 4, Policy 4.11 is to maintain an adequate supply of space appropriate to the needs of incubator industries. Specifically stating that “Larger, older buildings with storage and loft space are particularly valuable. The South of Market area is currently serving as a functional area containing a supply of such spaces needed by new businesses. The maintenance of a reservoir of such spaces, which can fulfill these needs, is needed.”

The Recreation and Open Space Element of the General Plan overlaps in places with preservation of landmarks, structures, and most specifically landscapes in its general call for the protection of open spaces and to provide opportunities for recreation and the enjoyment of open space in every San Francisco neighborhood (Objective 4). One policy of the element that touches Historic Preservation is Policy 2.10 which calls for the development of a Master Plan for Golden Gate Park and specifically addresses historic resources.

References to Historic Preservation or existing buildings in the Transportation Element occur in Policy 2.3 which generally relates to the City’s historic fabric by stating, “design and locate facilities to preserve the historic city fabric and the natural landscape, and to protect views.” Object 24 has to do with improvements to the ambience of the pedestrian environment and calls for the preservation of existing historic features such as streetlights and similar historic elements. It also calls for the preservation of pedestrian-oriented building frontages that provide architectural interest, a sense of scale, and transparency to provide visual connections for pedestrian benefit. Policy 30.2 discourages surface parking, particularly where sound residential, commercial or industrial buildings would be demolished pending other development.

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There is little direct reference to Historic Preservation in the Community Facilities Element except in the discussion of obsolete police facilities and headquarters and their future replacements, and the need for well-designed fire stations, libraries, health centers, educational buildings and other institutions. There is no relevant reference to Historic Preservation or existing buildings in the Air Quality Element. Likewise, in the Environmental Protection Element except to the degree that it addresses energy efficiency in existing residential, industrial and commercial buildings.

Although the Preservation Element is not required by State law, its purpose within the General Plan is to emphasize the importance of historic preservation in the City of San Francisco and educate decision makers, residents, and developers on the City's policies. This Preservation Element will further strengthen the relationship of historic preservation to land use planning within the framework of the General Plan and inform the review of individual projects through the entitlement process.

Relationship to Land Use Planning

Historic Preservation plays an integral role in land use planning in San Francisco as one of the eight Priority Policies of the City and through environmental review under CEQA. Preservation solutions must be considered when projects are undertaken that will adversely impact either known or potential historic resources. As a result, the Planning Department reviews projects that could impact such resources in order to determine appropriate alterations by applying the nationally accepted *Secretary of the Interior's Standards for the Treatment of Historic Properties*, which applies to all resource types, and *The Guidelines for Preserving Rehabilitating, Restoring & Reconstructing Historic Buildings* and *The Guidelines for the Treatment of Cultural Landscapes*, which applied to specific resource types.

Since 1985, Area Plans of the General Plan have identified important historic buildings that should be preserved, conserved, or adaptively reused both individually and in groups. These include the Downtown Plan (1985), Rincon Hill Plan (1985), the Chinatown Plan (1987), the Van Ness Avenue Plan (1988), the South of Market Plan (1990), and the South Bayshore Plan (1995). Older Area Plans also include important preservation policies, including the Civic Center Plan (1974), the Central Waterfront Plan (1990 with 1998 amendments) and the Northeastern Waterfront Plan (1990 with 1998 amendments). Area Plans currently being drafted with preservation policies include the Market and Octavia Plan, the Eastern Neighborhoods Plan, and the Balboa Park Plan.

Historic Preservation in San Francisco

San Francisco lost a significant number of historic resources in the period after World War II. During the economic boom that followed the war, and through the 1980s, new development resulted in the loss of many recognized historic buildings, including the Montgomery Block, Fox Theater, Alaska Commercial Building, Fitzhugh Building, and the City of Paris Department Store. Older office and industrial structures were demolished to accommodate modern office towers

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as the City's economy grew and shifted to the service and professional sectors. Urban renewal projects cleared large areas of older residential buildings in the Western Addition and South of Market. In addition, many older buildings were demolished as a result of highway projects.

Concern over demolition of older buildings and disruption of neighborhood fabric helped lead to the "freeway revolt" of the 1950s that halted a number of proposed freeway construction projects in San Francisco. By the early 1960s, it became clear to San Franciscans that the City's architectural heritage was being eroded through demolition, careless alteration, unsympathetic additions, and new construction out of scale with existing neighborhoods. In 1963, inspired by local architectural historians, the Junior League undertook an architectural and historic survey of San Francisco that resulted in the book *Here Today, San Francisco's Architectural Heritage*. In organizing the *Here Today* survey, the Junior League used criteria for historic significance suggested by the National Trust for Historic Preservation. In 1968, the Board of Supervisors adopted *Here Today* as the City's first historic resource survey.

The Planning Department's 1966 study "The Preservation of Landmarks in San Francisco" outlined goals for City legislation to protect architectural and historic resources. In 1967, the Board of Supervisors adopted a landmarks ordinance, Article 10 of the Planning Code, which established the Landmarks Preservation Advisory Board (Landmarks Board). The founding of local preservation nonprofit advocacy groups flourished nationwide in the 1970s as one of many developments stemming from the National Historic Preservation Act (NHPA); the Foundation for San Francisco's Architectural Heritage (now San Francisco Heritage) was founded in 1972. In 1985 the Downtown Plan was adopted as part of the General Plan, and Article 11 of the Planning Code implemented the preservation policies created for that Plan. Finally, the General Plan's introduction incorporated a 1986 voter-approved initiative, known as Proposition M, that added Section 101.1 to the Planning Code. This preamble to the Planning Code includes eight Priority Policies, including Policy 7: *That landmarks and historic buildings be preserved.*

In 1995, San Francisco became a Certified Local Government (CLG) under the provisions of the NHPA. CLGs must comply with five basic requirements:

- Enforce appropriate state and local laws and regulations for the designation and protection of historic properties
- Establish a historic preservation review commission by local ordinance
- Maintain a system for the survey and inventory of historic properties
- Provide for public participation in the local preservation program
- Satisfactorily perform responsibilities delegated to it by the state

In 2008, voters approved a charter amendment to create a new Historic Preservation Commission to expand the powers of the existing Landmarks Board. The Planning Department employs a preservation coordinator to oversee all historic preservation activity, in addition to a

preservation team dedicated to historic resource survey, and preservation technical specialists on each neighborhood planning quadrant team who review proposed projects that may impact potential or known historic resources.

Overview of San Francisco's Urban Development

The character of San Francisco's built environment has been influenced over time by various factors, including significant historical events, cultural movements, technological advances, notable individuals and groups, and changing trends in urban design and architecture. Underlying all of these factors is the City's dramatic natural topography. The City is confined to roughly 49 square miles at the tip of a peninsula where the San Francisco Bay to the east merges with the Pacific Ocean to the west through the northerly strait of the Golden Gate. The terrain is distinguished by the famed hills of San Francisco, which offer myriad views of Ocean, Bay, and City skyline, as well as by broad valley floors that historically received the earliest and densest settlements and that contain many of the City's oldest neighborhoods.

The cultural landscape that has emerged in San Francisco within the past two centuries has resulted from purposeful alterations of the natural physical landscape by successive waves of settlement and development. Coves and tidal marshes along the Bay were filled, hills and dunes were leveled and inland streams and lakes was diverted, drained, and reclaimed. It is no accident that San Francisco is located at an important natural harbor, as maritime commerce played a vital role in the development of San Francisco. However, the vitality of the port was ultimately offset by the city's relative geographic isolation by land. Until the construction of the iconic sister bridges, the San Francisco-Oakland Bay Bridge and the Golden Gate Bridge in the 1930s, the only direct ground approach to the City was from the south, while access to San Francisco from points north and east was achieved only by boat.

The earliest known inhabitants of the San Francisco Peninsula were indigenous Native Americans. Archeological remains of the settlements of indigenous peoples in San Francisco date to at least 5,000 years ago. The indigenous groups that most recently inhabited the Peninsula were Ohlone tribes of the Costanoan linguistic family who led riparian-based lifestyles along the shores of the Bay. At the time of European contact in the late 18th century, an Ohlone tribelet called the Yeluma lived in seasonal villages that dotted the eastern portion of the San Francisco Peninsula. While none of the structures of indigenous peoples remains extant, numerous archeological sites in San Francisco, including shell mounds and burials, demonstrate the character of the earliest people's settlements.

Non-native explorers, settlers, and colonists began to arrive on the San Francisco Peninsula in the late 18th century. The government of Spain established a military outpost, or *presidio*, at the northern tip of the peninsula near the mouth of the Golden Gate in 1776. Concurrently, Catholic missionaries of the Franciscan order established the sixth and then-northernmost *misión* in a chain that would eventually number 21 along the California coast. The permanent chapel of the Mission San Francisco de Asis was completed in 1791 near present-day 16th and Dolores Streets. Commonly called Mission Dolores, the chapel is the last of San Francisco's mission compound buildings to remain standing and is the oldest extant building in the City.

When Mexico won independence from Spain in 1821, the territory that included present-day California became a possession of the Mexican government. Mexico secularized the missions and conferred vast, private rancho tracts across the entire San Francisco peninsula and beyond. Another change brought by Mexican governance was international trade, which was not permitted by Spain. By 1835, a small civilian commercial port settlement, the Pueblo of Yerba Buena, was established in the area of California and Montgomery Streets, initially supported by the export of California hides and tallow and the import of goods from the eastern United States and Europe.

Enduring development patterns were established in Yerba Buena. In 1839, the pueblo's first survey platted the area around Portsmouth Square in what became known as the 50 Vara Survey. The survey established a rectangular grid of blocks aligned to the cardinal directions. In 1847, Market Street was laid out on a diagonal to the earlier street grid, running from the center of the shoreline of Yerba Buena Cove (approximately at the intersection of present-day Battery and Market Streets) toward Mission Dolores and Twin Peaks, with much of its route along an old path to the Mission. Soon thereafter, the 100 Vara Survey platted the area south of Market Street on a street grid aligned diagonally with Market, and with quadruple-sized lots, conflicting with the 50 Vara grid to the north. This unconventional mismatch of surveys, platted at the birth of the City, is apparent today in the enduring street-and-block patterns north and south of Market Street.

United States expansionism touched Yerba Buena in 1846 when the U.S. Navy took over the port without conflict and raised the American flag at Portsmouth Square. In 1847, during the Mexican-American War, the U.S. changed the name of the settlement from Yerba Buena to San Francisco. When the victorious United States officially assumed control of the territory in 1848, the pueblo population had reached about 400, including traders from the eastern United States and Europe. The settlement changed dramatically, however, with the discovery of gold on the American River in the Sierra

Nevada foothills that same year. San Francisco, already the primary port on the West Coast, was also the closest harbor to the strike, and by 1849 the city was growing exponentially as fortune-seeking men flooded in, primarily by sea, bound for gold country. Many of the newcomers remained in, or returned to, San Francisco, which transformed from a quiet harbor into an instant city teeming with a diverse, international population. By 1852 the population stood at approximately 35,000, and the character of the place had entirely changed from four years before.

As the Gold Rush gave way to more conventional patterns of growth and development, the instant city that had sprung up from tents, shacks, and cabins began a long and fitful transition into a permanent city of repute. With an increasing population, which also became more diversified with respect to ancestry, gender, age, and household type, came new construction to support housing, commerce, and industry. The City boundary line was sequentially expanded southward and westward, ultimately reaching its current location (and merger with the County line) in 1856 through the Van Ness Ordinance. Nonetheless, most of the City's commercial development remained concentrated near the port, the natural location of trade in goods and services. Related industrial activities were located near the port as well, primarily in the South of Market area, with rail spurs providing connections to move materials and goods to and from warehouses and manufacturing plants. Citywide, building booms and busts were closely linked to regional economic events, including the Comstock Silver Lode in 1859, and the economic depressions of the 1870s and 1890s.

Locations for housing were generally linked to early transportation corridors, some of which perpetuated the courses of the trails that had connected the three earliest Spanish-Mexican settlements (mission, presidio, and pueblo). In the 1850s and 1860s, expansion of residential neighborhoods was limited by sparse transportation, by the young municipality's reluctance to provide costly services to outlying areas, and by Mexican landowners defending legal claims to their ranchos. However, these obstacles were overcome and by the 1870s, residential streetcar suburbs had begun westerly and southerly marches that would continue through the turn of the century, notably in the large Western Addition and Mission Districts. Demand for new housing at the urban periphery resulted in the eventual removal of all cemeteries from the City, except for the tiny graveyard at Mission Dolores, which opened up large tracts of land for residential development and public parks, primarily in the Inner Richmond and Mission districts.

Advances in transportation technologies and expansions in service, from the 1860s to 1890s, were key influences in the settlement of the City. On a macro-scale, completion of the Transcontinental Railroad in 1869 facilitated the importation of people (investors, laborers, and consumers), trade, and building materials such as brick and stone. Locally, mass transit provided a means for people without independent transportation to live further from the commercial and industrial core, beyond walking distance. Mass transit vehicles were rudimentary at first, appearing in the form of horse-drawn cars on tracks in the late 1850s and early 1860s. A significant innovation occurred with Andrew Hallidie's invention of the cable car in 1873, which provided the means to conquer San Francisco's hills and thereby made steeper slopes available to residential development. Electrification of the lines began gradually in the 1890s and accelerated after the turn of the century. By the late 19th century, cable car lines and electric streetcar lines ran on most major streets of San Francisco, extending earlier housing patterns further westward and southward.

Amidst the rapid growth of early San Francisco, founders recognized the urban population's needs for parks and recreation spaces. By the end of the 19th century, these concerns had resulted in the establishment of various public squares, neighborhood parks, and natural areas in eastern San Francisco, often at the tops of hills. In western San Francisco, a huge tract of land in the so-called "Outside Lands" was set aside in the 1870s and developed as Golden Gate Park. The park was created in part to encourage settlement of the vast sand dunes adjacent to the park site, now known as the Sunset and Richmond Districts. By the close of the 19th century, little actual residential development had occurred in the outlying western districts, though Golden Gate Park was the site of the 1894 Midwinter Fair.

On April 18th, 1906, a massive earthquake struck San Francisco, one of the most significant events in the city's history. Although the quake itself did relatively little damage to San Francisco structures that were not located on filled land, the many ruptured gas lines, overturned furnaces, and toppled brick chimneys soon produced scores of fires that quickly spread unchecked throughout the City, while damaged water mains made firefighting extraordinarily difficult. The downtown and industrial districts were consumed entirely before the intense fires turned on the city's residential neighborhoods, most of which were constructed of wood that served to kindle the great inferno. For three days the fires blazed, and some 28,000 buildings were destroyed, including almost every structure east of Van Ness Avenue and Dolores Street, and north of 20th and Townsend Streets, an area that includes today's Financial District, North Beach, Russian Hill, Pacific Heights, South of Market, and the northern Mission District.

Some pockets within the fire area escaped destruction, including portions of Telegraph Hill. An estimated 3,000 or more people perished in the conflagration, and approximately 250,000 people – more than half of the entire 1906 population of San Francisco – were left homeless by the disaster.

The rebuilding and recovery of San Francisco from the 1906 disaster earned it the moniker of “The City That Knows How.” The physical rebuilding of the City began within months, and even days, of the 1906 disaster. The City’s reconstruction, despite occurring without central planning or leadership, resulted in modernization of the financial and industrial bases, densification and expansion of residential neighborhoods, wholesale social and economic reorganization of the city, and ultimately a new San Francisco. The sheer scope and magnitude of the physical rebuilding effort involved over 500 city blocks and four-fifths of the City that had been destroyed. Just as extraordinary was the pace of the rebuilding, as entire burnt districts stood intact just a few years after the disaster and the city was nearly complete again within a decade.

The early focus of reconstruction was the Downtown commercial district, which was entirely rebuilt and modernized within three years. The immense South of Market district, which was previously a mix of working-class residences and industry prior to the disaster, was rebuilt as primarily industrial and large-scale commercial. Higher density housing was constructed in rebuilt and surviving residential neighborhoods, which increased in population. Higher-income housing moved westward, while lower-income housing was pushed farther south. In order to accommodate the urgent City-wide housing needs, multi-unit flats were increasingly constructed in all residential neighborhoods, resulting in an “up-building” of the post-disaster City. Although many of the outlying residential neighborhoods were permitted to rebuild with wood, post-disaster fire codes were enacted in the Downtown, Tenderloin, and South of Market districts that resulted in widespread fire-resistant construction in brick and concrete in those areas.

The City, along with the world, symbolically celebrated the recovery of San Francisco when it hosted the Panama Pacific International Exposition in 1915, also the year that the rebuilt City Hall was completed. The success of the Exposition was a factor in the continuation of the city’s post-disaster building boom, which abated only with the start of World War I. A nationwide economic surge during the 1920s correlated with another building boom in San Francisco as well as the enacting of the City’s first Planning Code in 1921, mandating the geographic separation of land uses. The opening of streetcar tunnels in 1918 and 1928, and the adoption of mass automobile use beginning in the 1920s, spurred residential development in outlying areas of the City. Consequently, vast

areas of the Sunset and Richmond Districts in western San Francisco, and the Excelsior District in southern San Francisco, were built out from the 1920s through the 1940s with tract housing, primarily single-family dwellings with integral garages.

During the 1930s and the economic downturn of the Great Depression, the City was provided with some of its finest public works projects. Major structures such as the San Francisco-Oakland Bay Bridge, the Golden Gate Bridge, Coit Tower, Rincon Annex, Aquatic Park, and numerous firehouses, libraries, police stations, and schools were constructed with the aid of New Deal federal funds. In 1934, San Francisco completed its ambitious decades-long project of securing a reliable water source in the distant Hetch Hetchy valley and conveying it cross-state through an elaborate system of reservoirs and pipelines, ensuring consistent supply and continued urban growth. However, World War II preempted nearly all construction projects except work that supported military efforts. After the war, many military personnel and wartime workers stayed in San Francisco, swelling the population and prompting more residential construction in outlying areas where land was still available. Also after the war, much of the apartment block housing built for the influx of wartime workers was converted to lower-income public housing, and other lower-income public housing complexes were built.

The 1950s and 1960s brought federally funded, locally implemented urban renewal to San Francisco. Urban renewal projects cleared large sites in the City's core and redeveloped them with highly programmed landscapes. San Francisco's urban renewal projects resulted in the removal of many older buildings in established neighborhoods and a surge of new construction in project areas that included Yerba Buena, the Western Addition, Golden Gateway, and Diamond Heights. However, plans for urban renewal in the Mission District were halted due to community activism in opposition. Similarly, after the construction of several major freeways through San Francisco neighborhoods in the 1950s, community activism prevented completion of a major freeway system that was designed to entirely ring and bisect the City.

The Downtown area experienced dramatic growth in the 1970s and 1980s, driven by booming markets for office and commercial space. Construction of new high-rises expanded the Financial District and lifted the City's skyline. Mass transit was improved by completion of the Bay Area Rapid Transit regional rail system under Market and Mission Streets, and by a parallel Market Street subway for the City's local streetcar lines. Meanwhile, the waterfront gradually began a transition from obsolete port to public commons, a shift that was facilitated by the removal of the Embarcadero elevated freeway following the 1989 Loma Prieta Earthquake. The 1990s multimedia industry

boom in San Francisco also touched off a wave of commercial and residential construction, conversions, and renovations based in the South of Market district.

As the 20th century drew to a close, San Francisco's vast post-industrial districts located south of the Downtown core, long under-utilized and subject to deterioration, became the focus of physical redevelopment. New demands for housing, commercial, and institutional space initiated transformations of former warehouses and factories, rail yards, and shipping facilities into high-density urban neighborhoods replete with public services and amenities. These patterns of post-industrial redevelopment in southeastern San Francisco continue into the 21st century.

Overview of San Francisco's Architectural History

The extant architectural heritage of San Francisco dates almost exclusively to the United States era. The pre-historic indigenous settlements of San Francisco were seasonal villages that shifted locations and consisted of impermanent, lightly framed structures covered with willows and tule reeds, of which none remain. The Spanish and Mexican settlements that succeeded them utilized primarily adobe construction, reflecting the scarcity of native wood for building. Adobe construction was largely vernacular, with architectural flourishes reserved for edifices such as the Mission Dolores chapel, the only Spanish-Mexican structure to remain standing.

In the latter half of the 19th century, under United States governance, architecture in San Francisco tended to utilize the same general progression of styles that were popularized in the eastern U.S. and Europe during the century, though delayed by a number of years and with regional differences. In response to plentiful West Coast lumber, wood-only versions of designs originally rendered in brick or masonry were erected in San Francisco. Greek Revival style flourished in the 1850s and 1860s, Gothic Revival style less so. Italianate style dominated throughout the 1870s, Stick/Eastlake style characterized the 1880s, and Queen Anne and Shingle styles appeared in the 1890s.

Leading up to and after the turn of the 20th century, important shifts and innovations in San Francisco's architectural development occurred. New building technologies, such as elevators and reinforced concrete and steel frames, led to the rapid vertical development of Downtown, including construction of the city's first skyscraper in 1889. Other changes addressed concerns for health and welfare. The prescribed use of brick and other fireproof construction materials within specified commercial zones, enacted earlier in the City's history after a series of fires, was extended after the 1906 firestorm. Also as a result of the 1906 disaster, new residential construction favored flat roofs with tar and gravel surfaces that were more fire resistant than earlier pitched shingle roofs.

Shifts in popular styles accompanied the new building technologies. The asymmetry and elaborate ornament that had distinguished San Francisco's late 19th century architecture lost favor to the order and restraint of Classicism, which was widely introduced at the 1893 World's Columbian Exposition in Chicago. This stylistic shift was embodied in San Francisco by the completion of the Beaux Arts-style City Hall, as well as by the classically designed structures erected for the Panama Pacific International Exposition, in 1915. However, a similar exposition in San Diego, held the same year, provided a different architectural focus attuned to the American West. This California-based vocabulary drew primarily from Mediterranean influences, which in addition to referencing the Spanish-Mexican heritage of the area, were easily adapted to California's climate and natural environment. Consequently, in the latter 1910s and 1920s, styles such as Mission Revival, Spanish Colonial Revival, and Churrigueresque Revival were popularized in California. Other local architectural influences that were popular at the beginning of the 20th century included those associated with the Arts and Crafts Movement such as Craftsman and First Bay Tradition styles.

Art Deco architectural style appeared in the 1920s, most often used on commercial buildings. However, the Moderne style that emerged in the 1930s was used extensively in residential tract development in the postwar era, as was aforementioned Period Revival. International Style and Bay Region Modernism, which appeared as early as the 1930s in San Francisco, became a major design influence of the postwar era. Postmodernism followed in the 1970s and continued to influence architectural design throughout the remainder of the 20th century. With the turn of the millennium, a trend toward "green building" architecture has appeared in San Francisco's major new developments.

Overview of San Francisco's Cultural History

Throughout its history, San Francisco's cultural character and composition have undergone continual shifts as social, ethnic, and political groups have clustered, interacted, and dispersed across the landscape. Historically, neighborhoods in San Francisco have become identified with certain cultural groups, including ethnic communities that have settled within corridors or areas of larger neighborhoods. The resulting ethnic enclaves have included: Russian, Eastern European, and Jewish settlements in the Western Addition, Richmond District, and Potrero Hill; Greeks in the South-of-Market; Irish in the Mission; regional Italian colonies and Basques in North Beach; Chinese, Japanese, and Filipinos in Chinatown, and later Japanese in Japantown; African-Americans in the Western Addition and later Bayview; Central Americans and Mexicans resettling in the Mission; and formation of Southeast Asian communities in the

Tenderloin, to name just a few. In addition to a complex history related to ethnic and cultural communities, San Francisco has a notable socio-political history that includes abolitionism, labor movements, racial struggles and civil rights, beats and hippies, and gay/lesbian culture.

After approximately 5,000 years of indigenous settlement, the San Francisco peninsula experienced rapid cultural shifts as a result of European contact in the 1770s. The long-standing native culture was quickly replaced as successive governments of Spain, Mexico, and the United States gained control of the area. However, it was the discovery of California gold in 1848 that transformed San Francisco into a gateway for mass immigration from all over the world. Beginning with the Gold Rush and continuing through the 19th Century, many thousands of immigrants from places such as China, Latin America (particularly Peru, Chile, and Mexico), Europe (primarily England, Ireland, Germany, and France), Australia, and the eastern United States poured into San Francisco. In addition to the Gold Rush, other seminal events in the social history of San Francisco include the 1906 citywide disaster and reconstruction, which resulted in the dramatic reorganization of San Francisco's socio-economic geography, and World War II, which resulted in displacements, in-migrations, resettlements, and an overall larger and more diversified population.

Ethnic enclaves developed in San Francisco during the 19th Century due to a range of political factors, societal discriminatory practices (codified and unofficial), and practical benefits that included personal safety, employment opportunities, housing, religious institutions, and social networks. During San Francisco's nascent development, there seems to have been little sub-cultural sorting into distinct geographic areas within "the instant city," with the exceptions of Chinatown, a small "Latin Quarter" located in North Beach, and the clustering around Mission Dolores of Californios, or descendants of early Spanish and Mexican families. As the City expanded and shifted to permanence, distinct cultural and socio-economic enclaves laid claim to the developing landscape and by the late 1800s, segregation by ethnicity and class had become commonplace in San Francisco's neighborhoods. Wealthy enclaves, initially established in South Park and Rincon Hill, shifted to the top of Nob Hill, aided by cable car technology, which facilitated transport on steep slopes. Subsequently, the wealthier, primarily English, residents claimed nearly all the hills in northern San Francisco, with the exception of Telegraph Hill, which remained working class.

Irish and German immigrants were the two largest ethnic groups in San Francisco during the 19th Century, making up a respective 30% and 19% of San Francisco's total population in 1880. The Irish, largely unified by the Catholic religion, were a more

cohesive group, and primarily concentrated in the working class South-of-Market and Mission District neighborhoods. Although considered to be low in the European class hierarchy, particularly in the East Coast of the U.S., the Irish were politically powerful in San Francisco and had widespread control of the labor unions, and hence, access to jobs. German immigrants constituted a significant proportion of San Francisco's population, yet due to linguistic and religious differences, were a more heterogeneous and fragmented group. Initially clustered in the South-of-Market and Union Square, German immigrants and particularly wealthier Jewish Germans eventually shifted west into the Western Addition, while German Catholics settled in the Mission District.

Chinese immigrants historically formed the most visible and largely self-governed ethnic neighborhood in San Francisco. Initially the Chinese self-segregated in Chinatown (with the exceptions of a few vegetable farms and shrimperies in southeast San Francisco), but anti-Chinese sentiment led to codified segregation that limited settlement of Chinese to Chinatown. As anti-Chinese activities increased throughout California's interior in the 19th Century, most rural Chinese relocated to the relative safety of San Francisco's Chinatown, which swelled in density and area. By 1890, Chinese immigrants comprised 9% of San Francisco's population. Early Chinatown was largely a bachelor community – only 5% of the population was female, which precluded family stability and self-perpetuation found in other ethnic neighborhoods. In 1882, spurred by anti-Chinese rhetoric, the Chinese Exclusion Act was passed, which vastly curtailed immigration from China for over 80 years. Although the Exclusion Act was repealed in 1943, legal large-scale immigration of Chinese to San Francisco did not occur until after passage of the 1965 Immigration Act. Today, people of Chinese ancestry comprise an estimated 1/5 of San Francisco's population. Chinatown continues to serve as a gateway for immigration from China, though significant percentages of Chinese-Americans also now reside in the Sunset and Richmond Districts.

Immigration from Japan occurred on a much smaller scale beginning in the 1880s, with most Japanese immigrants clustering near South Park in South-of-Market or on the outskirts of Chinatown. During the citywide reconstruction and resettlement that followed the 1906 disaster, the Japanese moved west and established a large Japantown in the Western Addition. Many Japanese immigrants brought wives and families to the U.S., expanding the community and acculturating children, until the so-called "Gentlemen's Agreement" curtailed Japanese immigration from 1907 to 1924. Japantown was at its peak as a cultural enclave during the first half of the 20th Century, until World War II and the forced internment of Japanese-Americans occurred throughout the Western U.S. Following internment, many Japanese-Americans returned to San

Francisco's Japantown to reclaim their homes and businesses, while others relocated elsewhere in California and the U.S. Today, San Francisco's Japantown is one of three such cultural communities remaining in California.

The African-American population was not prominent in San Francisco until the latter part of the 20th Century. Prior to the 1906 disaster, most African-Americans in San Francisco were scattered in the Downtown and South-of-Market areas, claiming no distinct neighborhood and comprising a small part of the overall population. During the citywide reconstruction and resettlement that followed the 1906 disaster, many African-Americans began clustering in the Western Addition, where a small but continuous cultural presence developed. During World War II, African-Americans migrated en masse from the Southern U.S. to work in war-related shipyard industries, leading to increased population of African-Americans in the Western Addition and eventually permanent postwar settlements in the Bayview, Hunter's Point, and Ingleside neighborhoods. By the 1940s more than two-thirds of the Western Addition neighborhood's residents were African-American. Along with Japanese, Filipinos, and Koreans, African-Americans participated in the unique cultural diversity of the Western Addition that gave it the moniker of "Little United Nations." However, the neighborhood's social composition changed again as federally funded urban renewal in the 1950s and 1960s resulted in widespread displacement of African-Americans from the Western Addition to the Bayview, Hunter's Point and Ingleside neighborhoods.

These are just several of the many ethnic, cultural, and social themes that are a part of San Francisco's history. The cultural development of San Francisco is a rich and ongoing story for which the definitive record is still being produced.

Historic Resource Survey Program

The foundation of a sound historic preservation program is the identification of the locations, distributions, and relative significance of historic resources, including buildings, sites, structures, cultural landscapes, districts, and objects. This identification is achieved through the historic resource survey process, in which properties are systematically documented and evaluated in order to determine whether or not they are historically significant, either individually or as part of a district. Pursuant to *National Register Bulletin 24 Guidelines for Local Surveys: A Basis for Preservation Planning* and the National Park Service Publication *Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines*, a well-developed survey program is founded upon a context-based methodology. This methodology emphasizes the need for broad contextual knowledge in order to inform evaluation and identification of individual historic resources and districts. The San Francisco Citywide Historic and Cultural Context Statement (SF Context Statement), is being prepared by staff historians in order to

provide this contextual basis to guide the survey program and to facilitate resource identification and evaluation throughout San Francisco.

Surveys are important tools for planners, generating data that can inform long-range planning efforts and that can assist in review of proposed projects pursuant to the California Environmental Quality Act (CEQA) and Section 106 of the National Historic Preservation Act. In addition to identifying important individual historic resources and potential historic districts, a survey can inform the development of neighborhood-specific design guidelines for the purpose of retaining the historic character of the built environment. As historic resources are identified through surveys, property owners can potentially benefit by qualifying for tax credits and other incentives such as the use of the California Historical Building Code (CHBC). Identification of both historic and non-historic properties serves the public, property owners, government officials, and those who do business in San Francisco by streamlining environmental review, by reducing project-specific identification and evaluation efforts, and by providing project proponents with baseline information regarding their properties before and during the permit review process.

Historic resource surveys have been accomplished in different parts of the City over the past four decades, notably in 1968 and 1976, resulting in information on approximately 18,000 properties. Since the year 2000, the Planning Department has been actively engaged in survey work through the Citywide Survey Program. The focus of the program is on neighborhoods that are undergoing long-range planning efforts through the creation of Area Plans, that have active preservation organizations, and that contain high concentrations of potential historic properties.

Benefits of Historic Preservation

Historic resources link our present form to our community's roots and evolution. The preservation of historic resources defines and fosters San Francisco's unique character, increases property values, protects neighborhood stability and identity, promotes tourism, spurs economic development, and is an environmentally sustainable strategy. Through survey, historic preservation streamlines environmental review by reducing project-specific identification and evaluation efforts and giving project proponents baseline information on the status of their property before entering the review process. Overall, preservation creates a sense of place while discouraging "sameness."

The California State Office of Historic Preservation outlines the following benefits of Historic Preservation:

- Cultural benefits – those that make a community culturally richer for having the tangible presence of past eras and historic styles.
- Economic benefits – such as those that increase property values and tax revenues when historic buildings are protected and made the focal point of revitalization; create highly skilled jobs and retain a strong concentration of local businesses; increase opportunities for heritage tourism; and maintain a diversified housing stock.

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- Social benefits – including those that encourage community pride and awareness of historic resources.
- Planning benefits – those that result from having a concerted and well-defined planning approach to the protection of historic buildings.
- Environmental benefits – rehabilitation and reuse of existing buildings is an intrinsically sustainable building practice as opposed to demolition.

Incentives

Incentives are important to the success of the City's historic preservation program and can be a catalyst for neighborhood revitalization. Preservation incentives are intended to encourage property owners to repair, restore, or rehabilitate historic resources. In addition, incentives also encourage high-quality rehabilitation (in compliance with *The Standards*) and protection of historic resources in perpetuity through preservation easements. Incentives are not limited to financial considerations but may include regulatory benefits such as fee waivers, pro bono design, and technical assistance. Policies encouraging the promotion and use of incentive programs are found in Objective 6 of this Element. Further information about specific incentive programs is available on the Planning Department's website or at the Planning Information Center.

California Historical Building Code (CHBC)

The California Historical Building Code (CHBC) is a State-adopted building code that allows the City to approve reasonable alternatives to the standard building and mechanical requirements of historic buildings. CHBC Part 8, Title 24, regulations require enforcing agencies to accept reasonably equivalent alternatives to the regular code. The CHBC permits alternate design approaches that can minimize adverse visual impacts while still meeting energy, accessibility, structural and life safety requirements. It can be used to find creative solutions to protect historic materials and methods of construction that might not otherwise be permitted under the standard code. Property owners seeking to rehabilitate historic buildings may also be able to realize cost savings by using the CHBC.

Historic Rehabilitation Tax Credit

The Federal Historic Rehabilitation Tax Credit has been one of the most powerful and effective tools for spurring rehabilitation for both housing and commercial buildings. At the federal level, the IRS offers a 20% tax credit (not deduction-credit) for the preservation and adaptive reuse of commercial and income-producing buildings. To qualify for the credit, the property must be a certified historic structure per the requirements of the Tax Credit program—that is, listed individually on the National Register of Historic Places or contributing to a National Register listed historic district. (Non-historic buildings built before 1936 qualify for a 10% tax credit.)

Mills Act Tax Abatement Program

The Mills Act is an important economic incentive program in California for the restoration and preservation of qualified historic buildings by private property owners. Enacted in 1972, the Mills Act legislation grants participating local governments (such as the City of San Francisco) the authority to enter into contracts with owners of qualified historic properties who actively participate in the restoration and maintenance of their historic properties in return for property tax relief.

Preservation Easement

A preservation easement is a voluntary legal agreement that protects a significant historic or archaeological resource. An easement provides assurance to the owner of a historic or cultural property that the property's intrinsic values will be preserved through subsequent ownership. In addition, the owner may obtain substantial tax benefits. Historic preservation easements are also used to protect historic landscapes, battlefields, traditional cultural places, and archaeological sites. Under the terms of an easement, a property owner grants a portion of, or interest in, their property rights to an organization whose mission includes historic preservation. Once recorded, an easement becomes part of the property's chain of title and usually "runs with the land" in perpetuity, thus binding not only the owner who grants the easement but all future owners as well. According to the IRS an easement must either preserve a certified historic structure or a historically important land area to qualify for federal income and estate tax deductions.

Local Incentives

The City also offers a variety of incentives supporting the preservation, maintenance, and appropriate rehabilitation of recognized historic structures. The Mayor's Office of Housing (MOH), the Mayor's Office of Economic and Workforce Development (MOEWD), and the Redevelopment Agency are the three main agencies within the City that administer loan programs to assist in the rehabilitation of historic resources. The specific loan programs evolve as funding becomes available. In the past, resources from Community Development Block Grants (CDBG) have been used to create specific programs including the Community Housing Rehabilitation Program (CHRP) and the Code Enforcement Rehabilitation Fund (CERF). Other programs such as the Unreinforced Masonry Building (UMB) Loan Program, offering low-interest loans for seismic retrofit, and the Fund Committee have benefitted historic resources. The City's preservation bulletin on incentives provides updated information regarding the status of various loan programs.

In addition, the City has encouraged the transfer of development rights (TDR), through which owners of significant and contributory buildings can transfer unused development potential away from preserved buildings to other sites within the downtown zoning districts. Article 11 and Section 128 of the Planning Code detail the provisions that allow for the transfer of unused development rights from designated significant and contributory buildings. TDRs have helped the City accommodate orderly growth and preserve a compact downtown, while providing

property owners of significant buildings with economic incentives to maintain these historic resources.

OBJECTIVES AND POLICIES

OBJECTIVE 1

MAINTAIN AN INVENTORY OF HISTORIC RESOURCES.

The foundation of a sound historic preservation program is the identification of historic resources, which includes buildings, sites, structures, cultural landscapes, districts, and objects. This identification is achieved through an ongoing historic resource survey process, in which properties and areas of the City are systematically documented and evaluated in order to determine whether or not they are historically significant resources, either individually or as part of a district. A well-developed survey program is founded upon a context-based methodology. An important tool for planners, surveys inform long-range planning efforts and the review of proposed projects under the California Environmental Quality Act (CEQA) and Section 106 of the National Historic Preservation Act (NHPA). Surveys are also important for identifying important individual historic resources and historic districts for designation and appropriate treatment under Articles 10 and 11 of the Planning Code. In addition, a survey can inform the development of neighborhood-specific design guidelines that preserve character-defining features. As historic resources are identified through surveys, property owners can potentially benefit by qualifying for tax credits and other incentives such as the use of the California Historic Building Code. Identification of both historic and non-historic properties serves the public, property owners, government officials, and those who do business in San Francisco by facilitating the environmental review process and by informing decisions regarding land-use development.

POLICY 1.1

Develop and maintain a Citywide Historic Context Statement to inform an overall understanding of San Francisco's built environment.

The nationally accepted *Secretary of the Interior's Standards and Guidelines for Preservation Planning* emphasizes "the development of historic contexts is the foundation for decisions about identification, evaluation, registration and treatment of historic properties." Context statements serve as the basis for identifying and evaluating historic resources by providing a framework for recognizing and understanding their significance. Context statements guide historic resource survey and planning efforts by presenting information regarding significant events, development patterns, people, and resource types. Where survey work is being conducted, context statements aid identification efforts by forecasting the types and locations of significant property types. A context statement can also help prioritize areas for survey based on estimating the quality, rarity, and number of resources present. Where surveys have yet to be completed, context statements provide information to project planners, property owners, and professional evaluators on which to base their decisions in the land-use planning process.

The Context Statement for the City and County of San Francisco should be updated as additional information becomes available.

POLICY 1.2

Undertake a citywide survey to identify and evaluate properties that are forty-five years old or older, or that appear to have exceptional historic/cultural significance, and conduct periodic updates of the survey.

The City is committed to conducting an ongoing citywide survey of properties that are forty-five years old or older in conjunction with the Citywide Historic Resource Survey Program. Survey work is integrated with land use planning as the City undertakes Area Plans, Redevelopment Plans, Community, and Neighborhood Plans, and participates in federal projects that require historic resource surveys. Surveying resources associated with diverse or underrepresented populations, communities, themes, and resource types is a priority. The San Francisco Citywide Historic Resource Survey Program uses State of California Department of Parks and Recreation (DPR) 523-series forms to document historic resources, following the California Office of Historic Preservation's *Instructions for Recording Historical Resources* and the methodology of *National Register Bulletin 24: Guidelines for Local Surveys: A Basis for Preservation Planning*.

The findings of historic resource surveys should be updated and revised on a periodic basis to identify properties that newly qualify as resources or that have changed with regard to physical condition.

POLICY 1.3

Collect and evaluate information about potential historic and/or conservation districts that possess significant concentrations, linkages, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

The National Park Service, through the National Register of Historic Places, defines a historic district as a "significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." Historic districts provide for protection of representative areas of historic architectural or vernacular design, important or noteworthy elements of community development, cultural landscapes, and streetscapes. Historic districts also allow for local control of community character in historic areas and protection of historic resources. Through context-based historic resource survey, thematic groupings of individual historic properties can be identified as historic districts. This kind of resource identification provides an understanding of the overall history and development of an area, its characteristic features, architecture, and/or cultural landscape, and the importance of a tangible historical theme, and can show clearly that particular properties have significance as a group because of their thematic association with that history, architecture, and/or cultural landscape design. Properties that are not individually historically significant may still be considered contributors to the overall significance of a historic district, and therefore be identified as historic resources. A contributing resource is defined as a building, site, landscape, structure, or object that physically conveys some aspect to the historic

significance of a district, while a noncontributing resource does not. Once historic districts have been identified and documented, designation and preservation strategies may be implemented. An understanding of the character of a historic district informs evaluation of appropriate and compatible change within that district.

POLICY 1.4

Encourage property owners and development interests to undertake identification and evaluation of historic resources in advance of the environmental review and/or building permit review processes.

Identification of historic resources in advance of the environmental review process is beneficial to private developers and property owners. Various laws and policies, such as CEQA and Section 101.1 of the Planning Code, regulate the consideration and protection of historic resources. Identifying historic resources ahead of proposed development enables project designers to account for historic significance and to consider options for preservation. Owners of identified historic resources may also be eligible for a variety of incentives, including tax credits and the use of the California Historical Building Code (CHBC). Developers, private property owners, and public agencies should therefore be encouraged to undertake historic resource identification.

POLICY 1.5

Identify and evaluate city-owned historic resources.

The identification of historic resources is beneficial to City departments and the public, and the City shall assume responsibility for historic preservation by actively identifying, protecting and maintaining its publicly owned historic resources. Such resources may include buildings, sites, structures, cultural landscapes, and objects. Features affected by right-of-way improvements, such as retaining walls, granite curbs, entry monuments, light standards, street trees, and distinctive sidewalks should be considered. Various laws and policies, such as CEQA and Section 101.1 of the Planning Code, regulate the consideration and protection of historic resources. Identification allows the City to determine appropriate preservation options, to streamline the environmental review process, and to have early and meaningful knowledge to guide decision making. City-owned historic resources may be eligible to use the California Historical Building Code (CHBC).

POLICY 1.6

Recognize historic resources of exceptional importance that are of recent construction.

In order to ensure historical perspective and avoid judgments based on popular trends, a minimum property age of fifty years was established by the National Park Service through the National Register of Historic Places as a guide for evaluating historic resources worthy of preservation. [Make reference to OHP/CRHR/CHRID standards also.] However, the National Park Service and the California Office of Historic Preservation recognize that a property that has achieved significance within the past fifty years may be eligible if it is of exceptional importance or if it is an integral part of a district that is eligible for listing in the National Register of Historic Places and/or the California Register of Historical Resources. San Francisco contains examples of

properties built in the recent past, and the City follows the guidance of the National Park Service and the California Office of Historic Preservation in recognizing these properties as resources. Some historic resources of the recent past are already recognized; others were not identified in previous surveys. Nonetheless, they are important elements of the City's built environment due to associations with history, architecture, design, engineering, and/or culture.

POLICY 1.7

Recognize resources associated with diverse or underrepresented populations, communities, themes, and resource types.

Over time, preservation efforts in San Francisco, throughout California, and across the nation, have broadened from recognizing and retaining only examples of high-style architecture or properties associated with prominent people, to also include those that convey the contributions of underrepresented populations, communities, and themes. The preservation of physical heritage that is fully representative is recognized as essential to remembering, understanding, and interpreting an inclusive and complete perspective of history. The participation of underrepresented groups is critical to the identification and documentation of these resources and to making decisions regarding their treatment. The City will prioritize the participation and input of these groups during all stages of the preservation planning process including historic resource surveys, contexts statements, and neighborhood design guidelines.

POLICY 1.8

Develop and maintain an official City Register of identified historic resources and associated documentation, which shall be made readily available and accessible to property owners, government agencies, and the general public.

The City shall establish an official City Register as the centralized inventory of historic property documentation. The City Register shall include existing historic property documentation that has been compiled over time, using different methodologies and recorded in a variety of formats, as well as new historic property documentation that is generated henceforth. The City Register shall include: information from adopted City surveys (including surveys conducted by the City as well as surveys conducted by other parties and adopted by the City); individual property evaluations completed pursuant to Section 106 and CEQA reviews; nominations for official designations at local, state, and/or federal levels; and other types of property assessments that meet the evaluative standards of the City. The City Register shall provide property information in summarized, condensed, and/or indexed formats for practical use, and shall also provide complete property documentation where feasible. The City Register shall be made accessible to property owners, government agencies, and the general public through the most technologically advanced methods available (such as computer-based interactive applications), as well as through traditional methods (such as printing and distribution). The development of a City Register of historic property information, as well as various methods of accessing the information, shall allow City departments, property owners, and the general public to readily access and use historic resource information in their decision-making processes, in particular in the processing of permits.

OBJECTIVE 2

PROTECT AND PRESERVE HISTORIC RESOURCES.

Historic resources should be protected to prevent their loss to the City, and to ensure that they remain as resources for future generations. Historic resources are integral to San Francisco's quality of life, and their preservation includes benefits such as physically linking us to our past; contributing to the distinctiveness of our community character and unique sense of place; increasing property values and opportunities for heritage tourism; honoring and helping us understand the events, people and ways of life that came before us, and fostering community pride. In addition, the reuse of historic buildings is an intrinsically sustainable building practice.

Historic resources are affected by diverse constituencies, including public and private decision makers, businesses, community groups, and preservation organizations. All of these interested groups should be encouraged to participate in the planning and regulatory process of historic preservation.

POLICY 2.1

Protect individual historic resources eligible at the local, state, or national level.

The City shall promote the preservation of historic resources to ensure that the citizens of San Francisco have the opportunity to understand and appreciate the City's unique heritage. Protection of historic resources is addressed in Articles 10 and 11 of the San Francisco Planning Code, as well as in Section 101.1, which lists priority policies of the San Francisco General Plan, including Policy 7: *That landmarks and historic buildings be preserved.* In addition, the Major Environmental Analysis (MEA) Division of the San Francisco Planning Department is responsible for administering Chapter 31 of the San Francisco Administrative Code, which provides guidelines for implementing the California Environmental Quality Act (CEQA), a state law.

These City and State laws do not always require outright preservation of the resource. They are intended to establish mechanisms to ensure that potential impacts to historic resources are publicly disclosed, and that alternatives to demolition or inappropriate alterations are considered. Protection of individually eligible historic resources should be accomplished through comprehensive survey, planning and coordination with other land use laws. Preservation ordinances alone are often insufficient to protect historic resources unless integrated with General Plan objectives and policies for land use, transportation, and housing.

POLICY 2.2

Protect locally, state, or nationally eligible historic or conservation districts.

The City shall promote the preservation of historic districts and conservation districts for their significant cultural, social, economic or political history, as well as architectural or cultural landscape attributes. The standards for review of building permits for local historic districts and conservation districts are contained within the Planning Code's Articles 10 and 11. All designated historic districts, whether on local, state, or national registers, are also regulated under CEQA and Section 101.1 of the Planning Code.

Projects within a historic or conservation district that have the potential to affect historic resources are reviewed by the Planning Department for consistency with the district's character-defining features and properties according to *The Secretary of the Interior's Standards for the Treatment of Historic Properties (The Standards)*. In addition, land use and zoning incentives should be considered to protect and revitalize such districts. Zoning of historic or conservation districts should consider the height of the historic resources to protect against inappropriate additions. Each historic district's designating ordinance should include a list of the district's character-defining features and standards for review. Design Guidelines should be prepared for all designated historic districts.

In addition to buildings and structures, elements that contribute to district character may include street patterns, public squares, cultural landscapes, bridges, open space, street furniture, signs, and water features. Local and National Register districts in San Francisco include significant areas such as Civic Center and the Presidio of San Francisco National Park, early commercial centers such as Jackson Square, warehouse districts such as the Northeast Waterfront and South End, and residential areas such as Telegraph Hill and Dogpatch.

POLICY 2.3

Protect resources that have not been previously identified or designated that appear eligible for designation individually or as part of a district.

Not all historic resources have been designated, determined eligible, or identified. Resources significant for their architecture or design are more apparent. Resources that have associations with important people, historic events or broad patterns of history may require research to identify their significance. Under CEQA, a property or district that is identified as eligible for the National Register, California Register, or local listing, is a qualified historic resource, regardless of whether it is officially designated. The purpose of the Citywide Historic Resource Survey Program is to identify and inventory such resources. Once identified, these properties are given the same consideration as designated resources, and their preservation is supported under Section 101.1 of the Planning Code.

Preservation staff at the Planning Department will follow the guidelines set forth in San Francisco's preservation bulletin on CEQA review procedures for historic resources, which establishes categories of buildings that could be potential historic resources, due to their age, the type of work proposed, and whether the property was previously evaluated by a survey.

POLICY 2.4

Protect historic resources that are less than fifty years old.

The historic merit and design importance of places built within the last fifty years, including those of the Modernist Movement, are frequently less well documented and understood than older resources. As a result, these resources of the recent past are in jeopardy of demolition or inappropriate alterations.

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The City should recognize the importance of historic resources of the post-war and modern era, and enhance the public's appreciation for and understanding of San Francisco's mid-twentieth century architecture. In order to protect significant resources of the mid-twentieth century, the City will encourage preservation of the resources of the recent past through the promotion of their continued use and sensitive rehabilitation.

POLICY 2.5

Protect significant interiors in public or publicly accessible buildings.

For some types of public (or publicly accessible, privately-owned) landmark buildings--such as theaters, libraries, and courthouses--the interiors contain important character-defining features that are often essential to communicating the building's significance. Amendments to Planning Code Sections 1004, 1005 and 1006.7 (Ordinance 82-07) protect significant interior architectural features in publicly accessible designated landmarks by providing for review of proposed interior changes. Significant interiors in public or publicly accessible buildings should be clearly described in the designating ordinance (or landmark nomination) for that property. When interiors are included in the designation of such properties, they will be subject to the controls and standards set forth in Article 10.

POLICY 2.6

Support efforts to pursue formal designation of properties determined eligible for listing as City Landmarks or City Historic Districts under Article 10 of the Planning Code.

The Historic Preservation Commission, Planning Commission, Art Commission, and Board of Supervisors, as well as owners of properties to be designated, may initiate landmark designation under Article 10 of the Planning Code of an "individual structure or other feature or an integrated group of structures and features on a single lot or site, having a special character or special character or special historical, architectural or aesthetic interest or value, as a landmark." Historic resources eligible for local listing under Article 10 are identified by the public, through historic resource surveys, and through the environmental review and entitlement process. Official designation of those identified resources should be encouraged at the local state, and national levels. Designation serves to more widely and publicly recognize important historic resources in San Francisco. Designation also enhances access to a variety of financial incentives, including Mills Act property tax reduction. Landmark designation applications should be submitted to the Planning Department following guidelines set forth in San Francisco's preservation bulletin on landmark and historic district designation procedures, available on the Planning Department's website or at the Planning Information Center.

POLICY 2.7

Promote the rehabilitation and adaptive use of historic resources as an alternative to demolition.

Historic resources should be conserved, rehabilitated or adaptively reused. Character-defining architectural features and elements should be retained and incorporated into new uses. If a building has outlived the functions for which it was originally designed, adaptive reuse resulting

in a new function for historic buildings may be appropriate. Whether it remains in its historic use or is adaptively reused, the property owner may benefit from tax incentives for a rehabilitation meeting *The Standards*. Such treatment options may also avoid an adverse impact to the property as a historic resource under the California Environmental Quality Act (CEQA). In addition, rehabilitation and adaptive reuse are consistent with City's priorities regarding environmental sustainability, sense of place, and livability. Adaptive reuse provides a sustainable alternative to demolition by conserving valuable material and energy resources.

POLICY 2.8

Use enforcement powers to prevent unauthorized alterations and demolition by neglect.

Unauthorized alterations, alterations not consistent with a Certificate of Appropriateness (C of A), inadequate maintenance, and neglect all threaten the integrity of historic resources. Work undertaken without permits or a C of A jeopardize the process, which is designed to protect the safety of the inhabitants and the integrity of the historic resource. Historic resources are particularly vulnerable to deterioration due to their age, and lack of maintenance and neglect can result in effective demolition. The City should require that vacant buildings be safely stabilized to prevent deterioration. Incentives and financial assistance (a façade improvement program, for example) should be made available to those without the means to perform adequate maintenance. The City may need to take a proactive role in protecting threatened resources through a combination of enforcement, penalties, and financial assistance.

POLICY 2.9

Designate, preserve, rehabilitate and adaptively re-use City-owned historic resources.

The City and County of San Francisco owns more officially designated landmarks in the City than any other entity. In addition, other historic resources are located within public rights-of-way and on property owned by the City. All City departments and agencies will seek consultation with the historic preservation review commission when changes to City-owned historic resources are contemplated. Planning Department preservation staff is also available to consult on such projects.

POLICY 2.10

Foster inter-agency communication and collaboration on projects with historic preservation aspects or impacts.

Due to jurisdictional boundaries, many historic resources within San Francisco city limits are not subject to Planning Code legislation. These resources may be owned, or under the jurisdiction of, entities such as the Redevelopment Agency or Unified School District. Although such properties may be regulated under Federal and/or State preservation laws, it is important for Planning Department preservation staff members to maintain ties with appropriate contacts at such agencies and entities in order to further General Plan policies supporting historic preservation. Preservation staff will continue to assist such agencies with historic resource survey scoping and will work to develop lines of communication with these outside entities.

Preservation staff will be available to provide guidance, model policies, and technical assistance to agencies outside their jurisdiction.

POLICY 2.11

Collect, archive, maintain, and protect documents and artifacts that are important to the historical understanding of San Francisco's built environment.

Documents, letters, and ordinary artifacts of daily use can contribute to an accurate understanding of San Francisco's past. These cultural artifacts, whenever feasible, should be collected, properly documented, and preserved. Repositories for these materials should be identified so that researchers may access them. The San Francisco Public Library generally serves as the repository for the City's historical records. However, other institutions such as the California Historical Society also contain related information.

OBJECTIVE 3

PRESERVE ARCHAEOLOGICAL RESOURCES WITHIN SAN FRANCISCO AS AN IRREPLACEABLE RECORD OF THE PAST.

San Francisco has the oldest and most complex archaeological record of any major urban area in California. Its archaeological legacy is also a fragile, finite and non-renewable resource that is at risk of perishing at an accelerating rate due to the City's expanding built and infrastructural environment. San Francisco's historical archaeological record dates to 1776, and its prehistoric record dates to more than 5,000 years before the present. The archaeological record is the only surviving remains of some peoples (for example, prehistoric peoples and historically marginalized peoples) and of some historical phenomena (for example, a Gold-Rush period encampment). Archaeology enables us to gain insight into the history and prehistory of the area even where above-ground resources have been lost.

Activities that may potentially adversely affect archaeological resources should be avoided. Only in those cases where avoidance is not possible, archaeological sites should be preserved through appropriate archaeological treatment including data recovery, analysis, written interpretation, recordation, and curation of the archaeological data that has significant research value. The City will promote preservation and public awareness of its archaeological record through the planning process.

POLICY 3.1

Develop and maintain an archaeological geographic information system (GIS) of known and expected archaeological resources and of their associated documentation.

The use of information technologies to collect, correlate, and spatially represent archaeological site data and their associated documentation has a well-demonstrated potential to improve methods of identification and evaluation of known or potential archaeological sites. An archaeological GIS program is an optimal archaeological resource management tool to assemble and correlate a large database of site-specific archaeological information linked to geographical locations that can be presented spatially on a map. The City's development of an archaeological

GIS also provides a platform for data-sharing with other historic resource management agencies, such as the Northwest Information Center, the State Office of Historic Preservation, the Golden Gate National Recreation Area, and the California Department of Transportation. Development of a web-based interface would permit access to select archaeological information from the archaeological GIS, filtered on a need-to-know basis, to public agencies and the archaeological community.

POLICY 3.2

Ensure preservation or appropriate treatment of archaeological resources discovered during project activity.

State environmental law requires public agencies to identify and evaluate for listing on the California Register of Historical Resources any archaeological resource that may be affected by private or public actions over which the agency has discretionary approval (CEQA § 21083.2; 15128.4). State law further requires that the public agency determine if a potentially impacted archaeological resource may be a historic resource, which may require a professional assessment of the presence or absence, integrity, and potential research value of the archaeological resource (CEQA § 15128.4(c)(1)(2)). However, even with use of the most rigorous archaeological techniques, there may be a residual possibility that a significant archaeological resource could be inadvertently impacted by project activities.

POLICY 3.3

All Indigenous archaeological sites in San Francisco shall be presumed to have significant archaeological value.

Archeological sites associated with prehistoric and historic period Indigenous peoples are of significant informational value in understanding the prehistory and history of the San Francisco Bay Area. These sites are finite in number, rapidly diminishing, and non-renewable. San Francisco is archaeologically unique in the Bay Area in having a number of intact prehistoric shellmounds that have been preserved under sand dunes. Even re-deposited or disturbed prehistoric deposits may have significant informational value. Irrespective of its scientific integrity, an Indigenous archaeological site may have significance as a traditional cultural property when associated with the cultural values or practices of living Native Americans, such as the Ohlones (Costanoans) or members of other tribelets, such as the Wappo, Coast Miwok, and Southern Pomo, who were present in San Francisco during and after the Mission period. For all planning purposes, including for purposes of CEQA and Section 106 identification, evaluation, and treatment, Indigenous archaeological deposits/features shall be presumed to be of significant scientific and/or cultural value.

POLICY 3.4

Create archaeological preservation districts to preserve multiple-feature archaeological resources that are prehistorically, historically, or thematically interrelated.

Determination of the appropriate level of analysis and interpretation of an archaeological resource requires that the resource be understood within the broader context of other

archaeological resources to which it is historically, functionally, culturally, technologically, or thematically related. Historically interconnected archaeological sites may be geographically contiguous or discontinuous. Archaeological features or deposits may be misinterpreted and mis-evaluated in the absence of a contextual approach that examines discrete archaeological resources at an appropriate geographical, historical, and typological level of analysis. As an important historic resource management tool, an archaeological preservation district can ensure that discrete archaeological resources within the district are understood and evaluated within their appropriate context.

OBJECTIVE 4

ENSURE THAT CHANGES IN SAN FRANCISCO'S BUILT ENVIRONMENT RESPECT THE HISTORICAL CHARACTER AND HERITAGE OF THE CITY.

Historic resources are an important element of San Francisco's urban context and design and contribute greatly to San Francisco's diverse neighborhoods, their character and scale, and the overall city pattern. Alterations to, additions to, and replacement of older buildings can significantly impact this historical character and the heritage of the City. Alterations and additions to a landmark or contributory building in a historic district should be compatible with the building's original design qualities. New construction infill within a historic district should also be compatible with the character and scale of the district in accordance with Article 10 and the specific design standards adopted for the district. It is important that additions and new infill use high-quality materials and should be carefully designed to be sympathetic to, but differentiated from, historic resources.

The policies under this objective encourage rehabilitation and adaptive reuse. They embrace the nationally recognized *Secretary of the Interior's Standards for the Treatment of Historic Properties (The Standards)*. "The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation of historic materials and features." The *Guidelines for Preserving Rehabilitating, Restoring & Reconstructing Historic Buildings* and *The Guidelines for the Treatment of Cultural Landscapes* have been prepared to assist in applying *The Standards*. For non-designated historic resources, surveys and evaluations should be conducted to identify their character-defining features, and *The Standards* should be applied to avoid inappropriate alterations or demolitions.

POLICY 4.1

Apply the nationally established "Secretary of the Interior's Standards for the Treatment of Historic Properties" for all projects that affect designated or potential historic resources. The Secretary of the Interior's Standards for the Treatment of Historic Properties (The Standards) provides guidelines for determining appropriate treatment to use when a project has the potential to impact historic resources, including cultural landscapes. The treatments include Preservation, Restoration, Rehabilitation, and Reconstruction. Generally speaking, The Standards require protection of character-defining materials and features so that the integrity of a given resource will be retained. The Secretary of the Interior is responsible for establishing

and implementing *The Standards* for all properties under the Department of the Interior's authority, as well as advising federal agencies on the preservation of historic resources listed or eligible for listing on the National Register of Historic Places.

The Standards contain language related to the treatment of various materials, construction methods, building sizes and occupancy, and exterior and interiors. In San Francisco, *The Standards* are applied during environmental evaluation of known or potential historic resources in order to determine whether the project causes a significant impact that would trigger an environmental impact report (EIR), and to guide Department recommendations about preferable treatments. Under the California Environmental Quality Act (CEQA) review, projects that are in compliance with *The Standards* are generally deemed to have a less-than-significant impact on historic resources. *The Standards* have been adopted by landmark commissions and planning commissions throughout the country.

POLICY 4.2

Apply the "Secretary of the Interior's Standards for the Treatment of Historic Properties" for infill construction in designated or potential historic districts or conservation districts to ensure compatibility with the character of the districts.

The Standards shall also be applied as part of City review of proposed infill construction within designated or potential historic or conservation districts. These districts generally represent the cultural, social, economic, or political history of an area, and the physical attributes of a distinct historical period, specifically certain architectural styles, building typologies, and materials. Design of infill construction is important to the overall character of a historic district. Infill construction, that is new buildings located on non-contributing properties within a historic district, should complement the existing historic architecture without mimicking its style. Most importantly, new construction should respect the rhythm of massing and setbacks within a historic district. Each historic district will have varying character-defining features, and infill construction guidelines should be tailored to reflect these characteristics.

OBJECTIVE 5

INTEGRATE PRESERVATION GOALS INTO THE LAND USE DECISION-MAKING PROCESS.

Local regulation and public actions influence, positively or negatively, the preservation of historic resources. All City agencies shall consider the importance of historic preservation in the development and enforcement of land use, building code, fire code, environmental evaluation, and other regulations.

POLICY 5.1

Maintain a qualified governing body to oversee City preservation actions.

Article 10 of the Planning Code establishes a qualified historic preservation review commission. Article 10 initially created the Landmarks Preservation Advisory Board (Landmarks Board), a nine-member body appointed by the Mayor that functioned as an advisory board to the

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Planning Commission and the Planning Department. In November 2008, San Francisco voters approved a charter amendment to create a new Historic Preservation Commission expanding the powers of the existing Landmarks Board. The Historic Preservation Commission is a seven-member body appointed by the Mayor and approved by the Board of Supervisors. Six of the seven members of the Historic Preservation Commission are required to have specific professional qualifications related to architecture and historic preservation. As a Certified Local Government (CLG), the City of San Francisco is required to maintain a qualified historic preservation review commission.

The role of the Historic Preservation Commission (and, prior to 2008, the Landmarks Board) is to review

- the designation of individual landmarks and historic districts
- building permit applications that involve construction, alteration or demolition of individual landmarks and historic districts contributors
- Certificates of Appropriateness (C of A) for exterior alterations and for alterations of designated interiors
- National Register nominations
- Environmental impact reports (EIRs) or statements (EISs) prepared under the California Environmental Quality Act (CEQA) or Section 106 of the National Historic Preservation Act

The Historic Preservation Commission has the authority to

- make recommendations directly to the Board of Supervisors about the designation of landmarks, historic buildings, historic districts, and conservation districts
- approve permits or certificates for demolition of or alteration to designated landmarks and historic buildings as well as buildings in historic districts and conservation districts
- and make recommendations about proposed ordinances and resolutions concerning historic preservation

POLICY 5.2

Maintain a City staff of qualified preservation professionals.

Preservation staff at the Planning Department are responsible for the review of projects impacting historic resources. These staff members may also, among other tasks: review historic designation reports; conduct and organize historic resource surveys; and provide guidance to other agencies, City departments, and policymakers in matters related to historic preservation. It is essential that members of the Planning Department's preservation staff are qualified by education and/or experience to perform such duties. The nationally accepted Secretary of the Interior's Professional Qualifications Standards for Historic Preservation are therefore to be used to establish minimum qualifications for these positions.

POLICY 5.3

During the planning process, evaluate the significance of potential historic resources per the guidelines set forth in San Francisco's preservation bulletin on the California Environmental Quality Act (CEQA) review procedures for historic resources.

Many properties have not yet been evaluated to determine if they are historic resources for planning purposes. Qualified staff members determine whether a property is a historic resource under CEQA. When resources are identified, *The Secretary of the Interior's Standards for the Treatment of Historic Properties (The Standards)* can be applied to determine an appropriate treatment for the specific project. The Planning Department's current guidelines for CEQA review will be reviewed and revised as necessary to identify and provide enhanced protection to historic resources.

POLICY 5.4

Ensure that historic resource surveys are an integral component of long-range planning and Area Plan efforts.

In order to inform planning policies and zoning changes, a baseline of information about existing conditions is needed, including the identification of individual historic resources and districts. A historic resource survey of any area undergoing long-range planning efforts will be completed to generate information about the historic context of the area and identify historic resources for protection and potential designation as landmarks and/or historic districts. Planning policies can then be formulated that take into account the presence of historic resources. The Planning Department is committed to undertaking historic resource surveys as critical components of the planning process of each area and to incorporating survey information into plan policies.

POLICY 5.5

Include historic preservation policies in all Area Plans.

Just as it is important for this Preservation Element to be included in the General Plan, it is essential that specific historic preservation policies be called out in all Area Plans. Generally, preservation policies should be a separate section or chapter of an Area Plan in order to highlight their equal footing with other plan policies. All Area Plans will be developed to include the treatment of historic resources, including historic preservation policies, and shall have associated historic resource surveys.

POLICY 5.6

Consider historic resources, as well as the objectives and policies of this Element, in the development of zoning regulations and other regulatory policies.

This Preservation Element is supported by regulations in the Planning Code, such as Section 101.1 and in the application and enforcement of Articles 10 and 11. Further updates to the Planning Code should review proposed zoning changes with consideration to the goals of historic preservation. The Planning Code and other City laws should be updated as needed to reflect historic preservation policies consistent with this Element.

POLICY 5.7

Periodically review historic preservation procedures and guidelines related to CEQA, as well as Section 106, and Articles 10 and 11 of the Planning Code and update as needed.

As interpretations of regulations and laws—such as the Planning Code, California Environmental Quality Act (CEQA) and Section 106—evolve, related guidelines and procedures must be updated to ensure consistency. The historic preservation review commission and other political bodies may also recommend changes in procedures related to historic preservation. In the case of the Planning Code, revisions to Articles 10 and 11 (or to other sections) could result in codification of this Preservation Element. The City’s preservation bulletin series and zoning administrator bulletins should provide the public with up-to-date information about preservation procedures and guidelines.

POLICY 5.8

Ensure consistency between the Preservation Element and the General Plan.

The City will ensure consistency between the Preservation Element and all other General Plan elements, including subsequent updates of the General Plan.

OBJECTIVE 6

PROMOTE HISTORIC PRESERVATION THROUGH INCENTIVE AND GUIDANCE.

The maintenance, restoration, and rehabilitation of historic resources should be promoted through incentives for historic preservation ranging from financial support to flexibility in the application of code requirements. The City should continue to use existing programs while developing new approaches. The City should also encourage owners of historic resources to utilize incentives.

POLICY 6.1

Promote the use of financial incentives for the preservation of historic resources.

Policymakers, owners, developers and the public benefit by being aware in the project planning phase of financial incentives that support historic resource preservation. Once a project is underway, it can be difficult to change course even if there are economic incentives for doing so. A variety of financial incentives are available including federal tax credits, tax mechanisms, loans, grants, and transfer of development rights (TDR). A substantial incentive available in San Francisco is a ten-year property tax reduction through California’s Mills Act. The City should educate decision makers, business leaders, neighborhood groups, residents, and owner about available financial incentives. The use of such incentives should be facilitated through simplified and streamlined review procedures. The City should create new incentive programs that encourage the retention and rehabilitation of historic resources.

POLICY 6.2

The City will use and promote public awareness and widespread use of the California Historical Building Code.

The California Historical Building Code (CHBC) may be invoked when prevailing codes would diminish the historic character of a qualified historic resource. The code allows flexibility in the

way that requirements for repairs, alterations, and additions are applied to designated historic buildings, structures and properties. These standards and regulations are intended to facilitate the preservation of significant elements and features of such properties while providing for reasonable safety from hazards and reasonable access and use by the physically disabled. Use of the CHBC can reduce the cost of rehabilitating historic resources.

OBJECTIVE 7

FOSTER PUBLIC AWARENESS AND APPRECIATION OF SAN FRANCISCO'S HISTORIC RESOURCES AND THE BENEFITS OF HISTORIC PRESERVATION.

The preservation of historic resources is directly linked to the City's quality of life and its special identity and contributes to our culture and economy. It is widely recognized that where preservation is supported by local government policies and incentives, designation can increase property values and pride of place. Revitalization of historic commercial areas and adaptive reuse of historic districts and buildings conserves resources, uses existing infrastructure, generates local jobs and purchasing, and supports small business development and heritage tourism. The policies under this objective seek to promote, encourage, and educate the public about rehabilitation and adaptive reuse of historic resources. Preservation outreach can take the form of lectures, plaque and marker programs, tours, special events, websites, and publications. City staff, Historic Preservation Commission members, and non-profit preservation organizations should continue to play a major role in achieving this objective.

POLICY 7.1

Promote awareness of San Francisco's historic resources.

Residents and visitors alike express a desire to learn about historic resources. The City will support and encourage wider recognition of its history and significant historic resources. The identification of historic sites and landmarks with plaques or other signage provides residents and heritage tourists an opportunity to learn about the history of San Francisco.

POLICY 7.2

Encourage public participation in the historic resources planning process.

The participation of preservation organizations, neighborhood groups, and individual community members enriches the planning process and understanding of San Francisco's heritage. Public involvement has long been an influential component of the decision-making process. Engaging a greater number of communities in dialogue about historic resources that have meaning to them is desirable, and the City should initiate outreach to communities of diverse racial, ethnic, and socioeconomic backgrounds.

POLICY 7.3

Encourage activities that foster awareness and appreciation of historic events and resources.

Commemoration of historic events and resources educates the public and celebrates the history of San Francisco. The 100th anniversary of the 1906 Earthquake and Fire brought much media and public attention to the history of the City. Walking tours, house tours, and commercial

business tours, signs, public art, and visitor attractions showcase the City's history and should be encouraged.

OBJECTIVE 8

PROMOTE HISTORIC PRESERVATION AS A KEY STRATEGY IN ADHERING TO THE PRINCIPALS OF SUSTAINABILITY FOR THE BUILT ENVIRONMENT.

Preservation, rehabilitation, and adaptive reuse of historic resources should be key strategies in creating a more environmentally sustainable San Francisco. Beyond their cultural, social, and economic value, historic resources have inherent environmental value. They were constructed with many of the building principles we now consider "sustainable"—historic structures were built to respond to local climates and natural setting, and were typically constructed of locally available building materials. The continued use of historic buildings conserves materials and embodied energy and avoids the adverse environmental impacts of demolition and building waste disposal. Reusing a nonrenewable resource such as an older building is the ultimate form of recycling.

POLICY 8.1

Promote preservation, rehabilitation, and adaptive reuse of historic resources as a sustainable practice consistent with the goals and objectives of the Sustainability Plan for the City and County of San Francisco.

Ongoing commitment to historic resource preservation and conservation saves, recycles, rehabilitates and reuses valuable materials. San Francisco has adopted a *Sustainability Plan* that addresses environmental topics including energy, hazardous materials, water, human health, parks, open spaces, streetscapes, and transportation. It is the policy of San Francisco to promote resource conservation, rehabilitation of the built environment, and adaptive reuse of historic resources using an environmentally sensitive "green building standards" approach to development.

OBJECTIVE 9

PREPARE HISTORIC RESOURCES FOR DISASTERS AND DEVELOP EMERGENCY PREPAREDNESS AND RESPONSE PLANS THAT CONSIDER THESE RESOURCES.

The development of an emergency preparedness plan to protect, rehabilitate and seismically retrofit historic resources before and after a disaster is essential. A coordinated effort among the Office of Emergency Services, Department of Building Inspection, Fire Department, and Planning Department is necessary to develop a response plan specifically tailored to the protection of historic resources.

POLICY 9.1

In preparing for disasters, preventative measures are encouraged to protect the architectural character of San Francisco's significant structures and to improve life safety for citizens. These measures increase the likelihood that architecturally and historically important structures will survive future disasters.

During disasters, all buildings are susceptible to destruction or heavy damage. Older buildings that have not benefited from modern engineering practices, seismic retrofit, current code requirements, or the securing of unstable elements may not fare well in a disaster. A major earthquake could result in an irreplaceable loss of San Francisco's historic fabric. The City needs to achieve the related goals of increasing life safety and preserving older buildings by increasing their ability to withstand disasters of all kinds.

When City programs are proposed to abate hazards posed by existing structures, likely impacts on historic buildings must be thoroughly investigated. New programs should encourage the retrofit of historic buildings in ways that preserve their character-defining features while increasing life safety. When development concessions, transfers of development rights (TDRs), or City funds are granted to promote preservation of historic buildings, reasonable measures should be taken to increase the building's chances of surviving future earthquakes.

POLICY 9.2

Ensure that historic resources are protected in the aftermath of a disaster.

Preservation of the City's historic resources is an immediate concern during damage assessment in the aftermath of a disaster. Considering historic resource status should be part of the post-disaster inspection tagging process. Accurate information about historic resources is fundamental to effectively identifying buildings and structures so that they are not inadvertently further damaged or demolished. Existing survey information, completed prior to a disaster, streamlines the tagging process by providing inspectors immediate access to baseline documentation post-disaster. Parks are vulnerable in the immediate aftermath of a disaster and their protection should be a priority.

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	General Comments	Source(s)	Action Taken/ARG Recommendation	Notes	Planning Input needed
1.	More about <i>why</i> policies are put forth and how relate to legal/professional standards of historic preservation practice	NTHP	ARG reviewed model preservation elements from other cities. Davis and Santa Clara do not have legal section. San Diego and Riverside have basic similar to SF.		
2.	Greater reference to programs, laws, codes, legal basis	NTHP	Revisions made.		
3.	Language re: acknowledge contexts and resources associated with diverse populations	NTHP, Templeton	Revision made.		
4.	Add policy re: cultural diversity	LPAB 11-7-07	Policy 1.6 added.		
5.	Add Policy re: maintaining funding for staff and to carry out plan; Policy re: increasing funding	NTHP; Comm. Mtng.	ARG reviewed model preservation elements from other cities--does not appear to be standard component.		Planning Dept. Input needed.
6.	Use "historic resource" instead of architectural references; mention parks, open space and cultural landscapes; streetscapes	NTHP; FOMC; LPAB 11-7-07; P&T	Historic resource defined to include landscapes in addition to building, sites, structures, and objects. Architectural references changed to "historic resources" where appropriate.		
7.	Include need for maintenance (original design intent) as part of policy for historic cultural landscapes and parks	FOMC	Language added to policy 2.10 and the corresponding implementation measure.		
8.	Include references to the Secretary of the Interior's Standards for Cultural Landscapes	FOMC	Guidelines for the Treatment of Cultural Landscapes added where appropriate.		
9.	How will this Element be cross-referenced and integrated into the City's CEQA enabling legislation and policies?	NTHP	Selected Preservation Elements from other cities were reviewed and served as models. While some explain CEQA and its relevance to historic resources, they did not appear to contain any reference to their city's CEQA enabling legislation. Additional language on CEQA added to the "Legal Basis," "State Context" and regarding the OHP and its role.		
10.	Objective 3 and its supporting Policies are well written and should be a model for other parts of the Element; also the Opposite: Objective 3 should be re-written in same voice as the other sections	NTHP; Comm. Mtng.	Document revised for consistent voice.		
11.	Add a Policy similar to 3.1 (re: GIS) but for historic resources	NTHP	Added policy similar to 3.1 for historic resources.		
12.	Implementation Plan will need to be reviewed for CEQA issues	City Attorney	City staff will address.		
13.	LPAB's role should be strengthened	Comm. Mtng.; Horton	ARG action pending outcome of election.		
14.	Add specific language about contributory buildings in Districts	Comm. Mtng.	Policy 1.3 has information on districts and contributors. "Individual resource" "district" "district contributor" added to		

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			glossary.		
15.	Add Policy re: using General Fund for other preservation activities	Comm. Mtng.	Per City staff comments on feasibility, no changes were made.		
16.	Include more prescriptive language, too discretionary, vague regulation	Comm. Mtng.	Per City staff comments on appropriateness, no changes were made.		
17.	Include a definition of demolition; work with DBI to make it consistent	Comm. Mtng.; Horton	Definition added to glossary		
18.	Address neighborhood character and seismic retrofit – adaptive use strategies	Comm. Mtng.	Neighborhood reference added to introduction. Revision made; cross referenced with Community Safety Element of the General Plan.		
19.	Look at other Preservation Elements from other jurisdictions	Comm. Mtng.	ARG has reviewed preservation elements from Riverside, San Diego, San Juan Bautista, Davis, and Santa Clara.		
20.	State that Preservation Element will be equal to other mandatory General Plan Elements	Comm. Mtng.	ARG has reviewed all other General Plan Elements and does not find a similar statement. The Preservation Element is not one of the General Plan Elements required by State law.		
21.	Research how other cities have taken their Element through CEQA/EIRs	Comm. Mtng.	Major Environmental Assessment and the City Attorney will make that decision.		
22.	Discuss the public benefits of historic preservation	Comm. Mtng.	Revision made.		
23.	Detail inventory database: maps, links to status of properties and pending permits, include significant trees	Comm. Mtng.	Added policy similar to 3.1 regarding GIS for historic resources. Individual trees (not component of a cultural landscape) are not part of historic resource surveys or city, state, or federal lists for historic resources and have not been included.		
24.	Grey areas to be clarified: contributory buildings outside district boundaries; should Structures of Merit category be eliminated?; facadism as demolition; definition of demolition	Comm. Mtng.	Definition of contributing buildings defined in Policy 1.3 and in glossary. Decisions on Structures of Merit category beyond scope of this element. Demolition defined in response to #17. Facadism added to glossary		Planning Dept. input needed regarding eliminating Structure of Merit
25.	Add discussion of mitigation for demolitions, meaningful, such as fees or historic designations	Comm. Mtng.	ARG reviewed model preservation elements from other cities. Discussion of mitigation measures is too specific for a preservation element.		
26.	Weave in discussion of parks, streetscapes, gardens, cultural landscapes	Comm. Mtng.	Cultural landscapes defined in document. Parks, streetscapes, and gardens not individually addressed because they would fall under cultural landscapes.		

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27.	Address the relocation of resources – what should be allowed, change of context, how far you can move them	Comm. Mtng.	Relocation should be assessed on a case-by-case basis. ARG did not address this comment.		
28.	Prudent to do a full EIR for the Element	Comm. Mtng.	Major Environmental Assessment and the City Attorney will make that decision.		
29.	Implementation should have realistic timeframes, allow for long timeline and realistic staff availability	Comm. Mtng.			Planning Dept. input needed for Implementation Plan.
30.	Include other departments in responsibilities, try to partner with other City Agencies	Comm. Mtng.			Planning Dept. input needed for Implementation Plan.
31.	Explore ways to further protect significant parks (through Landmarking or historic districts)	FOMC	Additional language on cultural landscapes added to Policy 2.5 and 2.10.		
32.	Add references to Parkmerced	Goodman	References to current planning issues are too specific for a preservation element.		
33.	Add Policy re: review of all large scale proposed district changes, especially in the western region	Goodman	Protection of historic districts is addressed in Policies 2.2 and 2.3.		
34.	Element is timid, needs to be bold and forward-looking	Horton	ARG edited the Preservation Element to be consistent with standard technical language and to the same level of completion as of other model preservation elements.		
35.	An accounting needs to be made of other studies and surveys done in the past, and known resources should be accessible to the public, planners, and other agencies	Horton	Language added to Policy 1.1. ALSO ADDED TO IMPLEMENTATION MEASURES		
36.	Assess preservation policies in other Elements and Plans and make consistent with this Element	Horton	Revisions made.		
37.	Add Policy about prevention of demolitions, public input or review of serial permits	Horton	These issues are addressed throughout the document. Specifically, the collection of Policies under Objective 2 addresses preservation of historic resources over demolition.		
38.	Implementation should be part of the document and not separate, so that it doesn't get lost/forgotten	Horton	Implementation summaries are included in Element. Full implementation measures are treated in a separate document (the Implementation Plan).		
39.	Edit: "Preservation Staff" references should be replaced with "The Planning Department or other applicable city agencies"	Horton	Revisions made where appropriate.		
40.	Edit: spell out 19 th and 20 th as "nineteenth" etc...centuries	LPAB 11-7-07	Revisions made.		
41.	Look at OHP statewide implementation plan	LPAB 11-7-07	California Statewide Historic Preservation Plan reviewed and information added to document where		

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			appropriate.		
42.	Address issues of meeting Title 24 and compatibility with preservation, maybe add a Policy	LPAB 11-7-07	Statement added regarding Title 24 in Policy 6.3		
43.	Include more about philosophical underpinning that historic resources have intrinsic value	LPAB 11-7-07	Addressed under comment #22.		
44.	Recognize archeological and cultural throughout document instead of just in Objective 3; Sacramento is calling theirs a “Historic and Cultural Resource Element” instead of a “Historic Preservation Element”	OHP	ARG has edited the document to include references to archeology. In general cultural resources are a phrase that covers a broad range of resources. For clarity we have referred to historic resources and distinguished archeological resources where appropriate.		
45.	Expand upon statements to clarify for general public	P&T	ARG has revised document for improved clarity.		
46.	Use NR language such as “clusters” instead of “groupings”	P&T	“District” used wherever possible. “Cluster” use when appropriate.		
47.	Website/outreach should include information about CEQA process, workshops for the public and consultants	P&T	Covered by implementation plan.		
48.	There is no conclusion	P&T	ARG reviewed model preservation elements. None contained conclusions.		
49.	Implementation measures are not adequate; Track changes remove all implementation measures throughout Element	Shanahan	City staff consulted, and implementation measures will be a separate document.		
50.	Element fails to address issues of underrepresented minority groups; SF should follow the lead of the Statewide Historic Preservation Plan and prioritize outreach to underrepresented communities	Templeton	Added to Policy 1.6. ALSO ADDED TO IMPLEMENTATION MEASURES.		
51.	Declare historic preservation a core value, integral	Heritage	Revision made—language added throughout document.		
	Specific Comments				
	Introduction				
52.	Track changes – refer to open space and ROSE element	FOMC	References to cultural landscapes have been included where appropriate. Open spaces are not necessarily historic.		
53.	Track changes – add more detail to this section, various edits	Shanahan	Revision made to introduction.		
54.	Track changes – take out number of Preservation Bulletins	Shanahan	Revision made.		
	Overview History				
55.	Include more (many listed additions)	NTHP	Preservation elements are intended to be brief. Additions added where appropriate.		
56.	Include information about parks, that people lived there after 1906	FOMC	Preservation elements are intended to		

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	Earthquake, track changes suggested		be brief. There are many neighborhood stories that are too specific for a brief overview history.		
57.	Mention GG Park, Track changes suggested	FOMC	Information on founding of Golden Gate Park added.		
58.	Section is old-fashioned	LPAB 11-7-07	This section has been revised to follow periods of development in a table form similar to other elements.		
59.	Edits: p. 2: change “conversion that was often forced, and virtual enslavement” to “conversion and acculturation that was often forced, bound labor”	Cherny	Revision made.		
60.	Edits: p. 4: change “Exposition that same year, all classically” to “Exposition earlier that year, all classically”	Cherny	Sentence removed.		
61.	Add more information about settlement pattern of native people in SF and tribal affiliations, also mention archeological features include historic archaeological features as well	OHP	Revisions made.		
62.	As written emphasizes architectural response to major events; recommend adding info. Re: influence of ethnic groups, cultural groups, labor, etc...Also mention development of neighborhoods, not just buildings	OHP	Revisions made.		
63.	Track changes – add reference to Port and related historic districts, industrial/warehouse/worker housing	Shanahan	Preservation elements are intended to be brief. Additions added where appropriate. Historic district info added.		
64.	Track changes – add reference to Telegraph Hill survival during 1906 Fire; impact of 1939 World’s Fair	Shanahan	Revisions made.		
65.	Track changes – various re: last paragraph needing to avoid being “dated” and not refer to specific bulletins or timelines, need to mention other already finished neighborhood contexts	Shanahan	Listing all neighborhood contexts is too detailed and dated for Preservation Element. ADDED TO IMPLEMENTATION MEASURES.		
	Historic Preservation in SF				
66.	Mention surveys conducted by Heritage	NTHP	Listing all surveys is too detailed for Preservation Element.		
67.	Mention legal contexts	NTHP	Covered in Legal Basis section.		
68.	Include information on past efforts to adopt Preservation Element	NTHP	Does not seem to relevant to preservation policy		
69.	Track changes – include reference to ROSE element	FOMC	Revision made.		
70.	Include discussion of NHPA and national context	Damkroger	Discussed under Legal Basis: Federal Context.		
71.	Mention founding of SF Architectural Heritage	Damkroger	Added Heritage info.		
72.	Track changes – various edits	Shanahan	Revisions made where appropriate.		
	Historic Resources Survey Program				
73.	Re-order discussion of context-based process to beginning and contrast	NTHP	Revision made.		

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	with documentation of individual resources				
74.	Re-word to clarify benefits of survey re: environmental review, take out “transparent”	NTHP	Revised per comments.		
75.	Track changes: remove “credits” after tax	Damkroger	Agree with City comments, that Mills Act isn’t a tax credit, but the phrase “tax credit” is a quick way to imply tax benefits associated with preservation, and “other incentives” is specified.		
76.	In addition to Bulletin 24, also reference SIS for Archeology and Historic Preservation (foundation for preservation planning)	OHP	Revision made.		
77.	Track changes – various	Shanahan	Revisions made where appropriate.		
	Relationship to Land Use in Planning				
78.	Include information re: role of Element in General Plan and in relation to other Plan elements and Area Plans	NTHP	References to other Plan elements added. ALSO ADDED TO IMPLEMENTATION MEASURES.		
79.	Track changes – reference Standards for Landscapes	FOMC	Revision made.		
80.	Track changes – reference other Elements dealing with landscapes	FOMC	See comment 69.		
	Legal Basis				
81.	Include brief description of how SF works with each law/regulation as a CLG	NTHP	Looked at other preservation elements and description not included.		
82.	Better citation of each law and provisions related to historic resources	NTHP	Looked at other preservation elements and citations not included.		
83.	Track changes – include Standards for Cultural Landscapes	FOMC	<i>The Secretary of the Interior’s Standards for the Treatment of Historic Properties</i> applies to all resource types. <i>Where the Guidelines for Preserving Rehabilitating, Restoring & Reconstructing Historic Buildings</i> are mentioned, <i>The Guidelines for the Treatment of Cultural Landscapes</i> are also mentioned.		
84.	Track changes – reference Policy 2.2 of Planning Code	FOMC	Per City’s comments, Policy 2.2 of the Planning Code not referenced because not all open spaces are historic.		
85.	Track changes – discuss evolution of understanding of historic resources, more emphasis on social history, less elitist, looking at neighborhoods instead of individual bldgs	OHP	OHP paragraph added.		
86.	Track changes – clarify that locally designated properties are not automatically listed on the CR	OHP	The language the OHP comment addresses was revised in a prior draft.		
87.	Track changes – reference Section 4(f), clarify CR	Shanahan	Language on Section 4(f) added.		
88.	Track changes - address Charter Law and General Law	Shanahan	This discussion is too broad for the Preservation Element; more appropriate		

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			in the introduction to the General Plan.		
89.	Track changes - expand on other duties of LPAB, text edits, clarify TDR background, do not refer to Bulletins	Shanahan	NR nomination review added under Landmark duties. CLG requirements added to Historic Preservation in San Francisco. References to specific bulletins removed.		
	Incentives				
90.	Incentive results such as quality rehab and long-term protection (easements) should be described	NTHP	Revisions made.		
91.	Local incentives, and not just financial, should be briefly described	NTHP	See comment 90.		
92.	Track changes – include more info about incentives, delete reference to specific bulletin	Shanahan	See comment 90.		
	Objective 1 MAINTAIN AN INVENTORY OF HISTORIC RESOURCES EVALUATED AS SIGNIFICANT TO SAN FRANCISCO’S BUILT ENVIRONMENT.				
93.	Change title to “Maintain a Complete Inventory of Historic Resources”	NTHP	Revision made.		
94.	Comments also from Historic Resource Survey Program section apply	NTHP	Revision made.		
95.	Track changes: typo and delete “credit” after tax because Mills Act isn’t a credit	Damkroger	See comment 75.		
96.	Relates to Objective 5, should be blended or matched better	P&T	Intent of comment not understood by reviewers.		
97.	Track changes – various edits, discuss context-based survey	Shanahan	Revisions made.		
	• Policy 1.1 Undertake a citywide survey and evaluation of privately and publicly owned structures and sites forty-five years old or older, and conduct periodic updates of the survey.				
98.	Edit: <i>Policy 1.1: Undertake a citywide survey and evaluation of privately and publicly owned structures and sites historic resources forty-five years old or older, and conduct periodic updates of the survey.</i>	NTHP	Revision made.		
99.	Edit “one approach” passage to explain other approaches	NTHP	Revision made.		
100.	Implementation language should match Policy statement re: context-based	NTHP	REVISION MADE TO IMPLEMENTATION MEASURES.		
101.	Add sentence at end stating “City is committed to generating a complete citywide survey of historic resources”	NTHP	Revision made.		
102.	Add language to prioritize survey: areas or resource types that are at risk, underrepresented, or under recognized	NTHP	Revision made.		
103.	Track changes – do sites include landscapes?	FOMC	Revised to “historic resources” to be inclusive.		
104.	Track changes – implementation should include cooperation with	Damkroger	REVISION MADE TO		

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	private and neighborhood groups		IMPLEMENTATION MEASURES.		
105.	Track changes – remove reference to age (45 years old) and base significance on historic context	OHP	ARG agrees with the city. The survey methodology is to look at age eligible properties: this proposal would substantially burden the survey process. Statement about exceptional properties under 45 years of age included.		
106.	Track changes – various additions and edits, discussing specific plan of action for citywide survey; re-write last paragraph	Shanahan	Revisions made.		
	<ul style="list-style-type: none"> Policy 1.2 Prepare a citywide historic context statement to inform an overall understanding of San Francisco’s built environment. 				
107.	Edit: <i>Policy 1.2: Prepare a citywide context statement to inform an overall understanding of San Francisco’s historic built environment.</i>	NTHP	Revision made.		
108.	New paragraph suggested – see page 5 of NTHP comments	NTHP	Revisions made.		
109.	This should be Policy 1.1	NTHP; Shanahan	Revision made.		
110.	Track changes – edit Policy statement to make clear that thematic (discontiguous districts) are also recognized	Damkroger	ARG agrees with City. This is done through the phrase “and/or historical context” and references to themes in the narrative of the policy.		
111.	Implementation should include outreach programs and include discussion of new Planner position	Comm. Mtng.	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
112.	Track changes – edits and add reference to neighborhood surveys	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	<ul style="list-style-type: none"> Policy 1.3 Collect and evaluate information about areas with concentrations of historical resources that share physical qualities and/or historical context. 				
113.	Suggest re-wording as “potential historic or conservation district”	NTHP	Revisions made.		
114.	Clarify what constitutes a historic district in the Policy statement	NTHP	Revisions made.		
115.	Explain why it is important to identify districts as opposed to individual buildings and how districts benefit preservation efforts	NTHP	Revisions made.		
116.	Track changes – add reference to open spaces	FOMC	Reference to cultural landscapes added.		
117.	Track changes – edits, word choice, add reference to area context statements	Shanahan	Revisions made where appropriate. See comment 112.		
	<ul style="list-style-type: none"> Policy 1.4 Encourage private developers and property owners to assist in the identification of historic resources. 				
118.	Suggests new language for Policy: “Encourage property owners and development interests to undertake identification and evaluation of historic resources to streamline environmental review processes and take advantage of preservation incentives.”	NTHP	Revision made.		

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119.	Add more information about how the City would encourage this outside of Institutional Master Plans	NTHP	Revision made. ALSO ADDED TO IMPLEMENTATION MEASURES.		
120.	Clarify the IMP process	P&T			Planning Dept. Input needed.
121.	Require that City projects also document resources	P&T	Policy added.		
122.	Track changes – require this instead of encourage, evaluations should be done by Planning or by consultants independent from developers, but paid for by private owners/developers	Shanahan	Suggested edits would change the meaning of the policy. Information added to implementation under Policy 2.1		
	<ul style="list-style-type: none"> • Policy 1.5 Recognize historic resources of exceptional importance that are less than fifty years old. 				
123.	Needs more explanation about why it is important	NTHP	Revisions made.		
124.	Explain 50 year rule and criteria to determine exceptional importance	NTHP; Comm. Mtng.	Revisions made.		
125.	Mention reasons for significance such as architecture and work of master	NTHP	Revision made.		
126.	Track changes – conflicts with Policy 1.1	OHP	Made consistent with Policy 1.1		
127.	Track changes – context statement will include properties less than 50 years old to aid in this	Shanahan	Revision made.		
	Additional Policies suggested under Objective 1:				
128.	<ul style="list-style-type: none"> • Commit to listing eligible properties on California Register and National Register and to designating SF Landmarks 	NTHP	Revision made to Policy 2.5.		
129.	<ul style="list-style-type: none"> • Identify and evaluate significant interiors in public buildings or in publicly accessible private buildings 	NTHP	Added Policy 2.4b		
130.	<ul style="list-style-type: none"> • Identification, evaluation, and designation of resources associated with diverse or underrepresented populations, communities, themes, or resource types will be a priority in the survey program. 	NTHP	Added Policy 1.6		
131.	<ul style="list-style-type: none"> • The Department shall maintain online and at the Planning Information Center the comprehensive Historical Context Statement for San Francisco, including architectural periods and styles, and the various area specific context statements, as they may be changed from time to time. 	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
132.	<ul style="list-style-type: none"> • Track changes: three additional policies 	Shanahan (p. 19)	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
133.	<ul style="list-style-type: none"> • Require City agencies to survey their own properties 	Shanahan	Revision made.		
	Objective 2 PROTECT AND PRESERVE HISTORIC RESOURCES.				
134.	Add language about why preserving historic resources is in the public interest (physically links us to our past; contributes to the distinctiveness	NTHP; Shanahan	Revisions made.		

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	of our community character and unique sense of place; honors and helps us understand the events, people and ways of life that came before us); tourism, sustainability				
135.	Specify that members of the general public and diverse constituencies are encouraged to participate in the process	NTHP	Revision made.		
136.	Track changes – add “landscapes”	FOMC	“Buildings” changed to “historic resources.”		
137.	First sentence, replace “important” with “integral”	Heritage	Revision made.		
	<ul style="list-style-type: none"> • Policy 2.1 Protect individually designated buildings and other historic resources. 				
138.	Edit: <i>Protect individually locally, state, or nationally designated buildings and other historic resources.</i> ; track changes –add “landscapes”	NTHP; FOMC	Revisions made including changing “buildings” to “historic resources.”		
139.	Provide more information about how SF protects historic resources as a CLG in relation to General Plan, Articles 10&11, CEQA and Sect. 106	NTHP	Covered in Legal Basis section		
140.	Define “individually designated” and different listing programs	NTHP	The term is self explanatory. Not necessary to define.		
141.	Clearer explanation of what “protection” entails	NTHP	REVISION MADE TO IMPLEMENTATION MEASURES.		
142.	Add detail about how and where preservation should be integrated with other land use laws	NTHP	Revisions made.		
143.	Wording not strong enough, implies demolition is at top of the list, also should include inappropriate alterations	Comm. Mtng.	Revision made.		
144.	Track changes – add reference to Policy 2.2 open space	FOMC	Language changed to “historic resources” which includes cultural landscapes. Separate policy not needed.		
145.	Track changes – add “inappropriate alterations” and other edits	Shanahan	Revisions made.		
	<ul style="list-style-type: none"> • Policy 2.2 Protect groupings of historic resources that are formally listed as historic or conservation districts. 				
146.	Edit: Protect <u>locally, state, or nationally designated groupings of historic resources that are formerly listed as historic or conservation districts.</u>	NTHP	Revision made.		
147.	State that projects within districts will be reviewed with the Secretary’s Standards	NTHP	Revision made.		
148.	Discuss differences in reviewing projects within districts versus individual resources; are there more tools that could be applied or improved?	NTHP	REVISIONS MADE TO IMPLEMENTATION MEASTURES.		
149.	Discuss how development within districts will be consistent with character; recommend developing design guidelines as part of	NTHP; Damkroger	REVISIONS MADE TO IMPLEMENTATION MEASTUERS.		

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	implementation				
150.	Track changes – add “and landscape”	FOMC	Revision made.		
151.	Track changes – address lowering height limits within historic districts to prevent inappropriate additions	Shanahan	This suggestion is not consistent with other model elements.		
	<ul style="list-style-type: none"> Policy 2.3 Protect resources that, based on professional evaluation, appear eligible for formal designation individually or as part of a grouping. 				
152.	Opening language confusing, makes it sound like unidentified resources are all unattractive, should be clear that just not surveyed/identified yet	NTHP			
153.	Elaborate on guidelines used to identify un-rated resources; any guidelines outside of CEQA?	NTHP	ARG agrees with City comments that it is best not to go into those details since the Element would need to be amended every time guidelines were updated. Reference bulletin on CEQA in implementation.		
154.	Track changes – add “or in terms of landscapes”	FOMC	Language changed to be broader.		
155.	Track changes - note Standards for Landscapes in Implementation	FOMC	CEQA covers historic resources, which includes cultural landscapes. No change made.		
156.	Track changes – edits, new language re: CEQA and staff training	Shanahan	Revisions made except comment regarding department’s CEQA guidelines, which are addressed in Bulletin 16: CEQA Review Procedures. Staff training not found in other cities’ model preservation elements..		
	<ul style="list-style-type: none"> Policy 2.4 Protect historic resources that are less than fifty years old. 				
157.	Policy should be re-framed to address recent past, including properties over 50 years old, concern about modern materials is similar in 1930s and ‘40s era properties	NTHP; Comm. Mtng.	Revisions made.		
158.	Are there policies the City could implement to encourage greater identification of resources from the recent past?	NTHP	Dealt with in citywide context statement and Policy 1.4.		
159.	Track changes – add “cultural landscapes”	FOMC	Revisions made including changing “architecture” to “historic resources.”		
160.	Should indicate basis for training; note the NR Bulletin re: Preserving the Recent Past	P&T	Too specific for a preservation element.	NPS, Cultural Resource Management, “Preserving the Recent Past.” Collection of essays on recent past—not guidelines.	
	<ul style="list-style-type: none"> Policy 2.5 Support efforts to pursue formal designation of properties 				

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	determined eligible for listing as City Landmarks or City Historic Districts under Article 10 of the Planning Code.				
161.	Track changes – remove reference to Bulletin 5	Shanahan	Revisions made. Reference to bulletins generalized.		
	• Policy 2.6 Encourage the rehabilitation and adaptive use of historic buildings and other historical resources as an alternative to demolition.				
162.	Edit last sentence: “Such treatment options may also avoid an adverse impact to the property and could therefore negate the need for an Environmental Impact Report as an historic resource under the California Environmental Quality Act (CEQA).”	City Attorney	Revision made.		
163.	Edit Implementation: “If so, a project may be exempt from further environmental review. . .”	City Attorney	Revision made.		
164.	Outline benefits of rehab and explain why city supports it	NTHP	Revisions made.		
165.	Reference environmental sustainability	NTHP	Revisions made.	See 164.	
166.	Discuss livability and sense of place supported by reuse	NTHP	Revisions made.	See 164.	
167.	Discuss incentives for adaptive reuse such as Federal Rehab tax credit	NTHP	Discussed in incentives		
168.	Use a stronger word than “encourage” in Policy	Comm. Mtng.	Revision made.		
169.	What would justify demolition of a historic resource?	Comm. Mtng.	ARG agrees with City comments. There is no general rule that would cover all situations and should be dealt with on a case-by-case basis. No changes made.		
170.	Expand narrative, include discussion of intrinsic value of a building	Comm. Mtng.	Revision made.		
171.	Remove the words “whenever possible”	Comm. Mtng.	Revision made.		
172.	Note that replacement materials are expensive	Comm. Mtng.	Comment not addressed in this policy. Economic benefits of preservation covered in Benefits section.		
173.	Define “demolition”	P&T	Comment not addressed in this policy but addressed in glossary		
174.	Track changes – various edits, reference SIS	Shanahan	Revisions made.		
	• Policy 2.7 Use enforcement powers to prevent demolition by neglect.				
175.	Enforcement also needed for unauthorized alterations, etc...	Comm. Mtng.	Revisions made.		
176.	Is there a way to apply to cultural landscapes?	FOMC	See Policy 2.10.		
177.	Implementation should include evaluation of penalties, making sure penalties deter violations	Damkroger	REVISION MADE TO IMPLEMENTATION MEASURES.		
178.	Track changes – move implementation into Policy narrative	Shanahan	REVISION MADE TO IMPLEMENTATION MEASURES.		
	• Policy 2.8				

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	Demonstrate leadership through the preservation, rehabilitation and adaptive use of publicly owned historic resources.				
179.	Edit to policy statement: replace “publicly” with “City” owned	NTHP	Revision made.		
180.	Include more demonstration of commitment through systematic survey of City-owned resources, or consider putting covenants on properties transferred out of City ownership	NTHP	REVISION MADE TO IMPLEMENTATION MEASURES.		
181.	Track changes – insert “designation” in Policy	Damkroger	Revision made.		
182.	Track changes – Edit Policy statement and add requirement for LPAB review, statement about Element	Shanahan	Revisions made.		
	<ul style="list-style-type: none"> Policy 2.9 Foster inter-agency communication and collaboration on projects with historic preservation aspects or impacts. 				
183.	City planning staff should provide guidance, model policies, and technical assistance to agencies outside jurisdiction	NTHP	Revisions made.		
184.	Emphasize the need for this re: landscape preservation	FOMC	Historic resources includes landscapes.		
185.	Track changes – move implementation into Policy	Shanahan	Combined with NTHP revisions.		
	<ul style="list-style-type: none"> Policy 2.10 Recognize and protect non-architectural historic resources. 				
186.	Edit: <i>Recognize and protect historic structures, objects, sites, landscapes, and cultural landscapes non-architectural historic resources.</i>	NTHP	ARG agrees NTHP that these property types are represented in the definition of a “historic resource” and a separate policy gives these appearance that these resources are secondary to buildings. POLICY DELETED.		
187.	Use NR and CR terms, and provide examples of each	NTHP	POLICY DELETED.	See 186.	
188.	Explain why it is a necessary distinction for this Policy, may give the appearance that other resources are secondary to buildings	NTHP	POLICY DELETED.	See 186.	
189.	Address infrastructure and transportation resources	Comm. Mtng.	POLICY DELETED.	See 186.	
190.	Track changes – add Rec and Park to implementation	FOMC; Damkroger	POLICY DELETED.	See 186.	
191.	“Non-architectural” is awkward	OHP	POLICY DELETED.	See 186.	
192.	Track changes – move implementation into Policy narrative	Shanahan	POLICY DELETED.	See 186.	
	<ul style="list-style-type: none"> Policy 2.11 Collect, archive, maintain, and protect documents and artifacts that are important to the historical understanding of San Francisco’s built environment. 		Reviewers appeared to have misunderstood the intent of this policy, which refers to the protection of actual documents and artifacts, not the data collected as part of preservation efforts such as surveys. “Historic Resources” include buildings, structures, sites, objects, and cultural landscapes but not moveable artifacts.		
193.	Recommend separate policy re: public accessibility to information	NTHP	Public access to survey information addressed under Policy 1.7.		

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194.	Include discussion of CHRID	NTHP	Too specific for preservation plan		
195.	Track changes – add implementation about working with other departments to gather info about history of SF cultural landscapes	FOMC	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
196.	Add info about how this will be done, and who will have access to the information	P&T	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
197.	Track changes – move implementation into Policy	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	New Policies suggested under Objective 2:				
198.	<ul style="list-style-type: none"> Four new policies suggested 	Shanahan, p. 21	ARG agrees with City that these work better as implementation than a policy. REVISIONS MADE TO IMPLEMENTATION MEASURES		
199.	<ul style="list-style-type: none"> Two new policies suggested 	Shanahan, p. 25	ARG agrees with City that these work better as implementation than a policy. REVISIONS MADE TO IMPLEMENTATION MEASURES		
	Objective 3 PRESERVE ARCHEOLOGICAL RESOURCES WITHIN SAN FRANCISCO AS A UNIQUE, IRREPLACEABLE RECORD OF THE PAST				
200.	Different voice from other Objective sections – should be more concise: also Opposite comment that all of Element should be in this voice	Comm. Mtng.; NTHP	Revisions made where appropriate.		
201.	Edit: drop the apostrophe in “It’s archeological” (second sentence)	Cherny	Revision made.		
202.	Amazing objective, model for other local gov’ts	OHP	No change required.		
203.	Track changes – edits and additional language	Shanahan	Revisions made.		
	<ul style="list-style-type: none"> Policy 3.1 Develop and maintain an archeological GIS (Geographic Information System) of known and expected archeological resources and of their associated documentation. 				
204.	GIS should also be used for historic resources inventory, per Objective 1	P&T	See comment 23.		
205.	Track changes – edits and additional language	Shanahan	Implementation measure kept separate.		
	<ul style="list-style-type: none"> Policy 3.2 Ensure preservation or appropriate treatment of inadvertently discovered archeological resources. 				
206.	Track changes – edit Policy Statement and move implementation into Policy narrative	Shanahan	Implementation measure kept separate.		

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	<ul style="list-style-type: none"> Policy 3.3 All Indigenous archeological sites in San Francisco shall be treated as having prima facie significant archeological value. 				
207.	Implementation should include consultation with tribal representatives	OHP	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
208.	“Prima facie” should be defined	P&T	Revision made.		
209.	Track changes – edit to Policy Statement, move implementation into Policy narrative	Shanahan	Revision made.		
	<ul style="list-style-type: none"> Policy 3.4 Create archeological preservation districts to preserve multiple-feature archeological resources that are prehistorically, historically, or thematically interrelated. 				
	<ul style="list-style-type: none"> Additional Policies suggested under Objective 3: 				
210.	Incorporate archeological resources in the City’s survey and preservation planning efforts	NTHP	Revision made to Policy 3.0.		
211.	Public education program	NTHP	Implementation measure.		
	Objective 4 ENSURE THAT CHANGES IN SAN FRANCISCO’S BUILT ENVIRONMENT RESPECT THE HISTORICAL CHARACTER AND HERITAGE OF THE CITY.				
212.	Explain why the Secretary’s Standards are being adopted	NTHP	Revision made.		
213.	Track changes – include Standards for Cultural Landscapes	FOMC	Revision made.		
214.	Track changes – numerous edits that change the tone and meaning of the Objective	Shanahan	Revisions made in part.		
215.	Clarify statements about “compatibility” and use stronger language about high-quality, contemporary design, and need to differentiate existing from new construction	Heritage	Revision made.		
	<ul style="list-style-type: none"> Policy 4.1 Apply the nationally established Secretary of the Interior’s Standards for the Treatment of Historic Properties for all projects that affect known or potential historic resources. 				
216.	Edit Implementation – delete last sentence (“In order to codify . . .”); Article 10 is separate from CEQA procedures, but a policy could be drafted to specify that properties designated under Article 10 would be subject to review under the Standards.	City Attorney	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
217.	Term “strategies” should be changed to “treatments”	NTHP	Revisions made.		
218.	Track changes – add Standards for Cultural Landscapes to Policy title and to implementation	FOMC	“Historic resources” includes cultural landscapes. SIS Standard’s for the Treatment of Historic Resources includes cultural landscapes. Specific guidelines not mentioned.		

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219.	Don't believe SIS are being applied well, not adequate, disagree with implementation to codify their use	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	<ul style="list-style-type: none"> Policy 4.2 Apply the Secretary of the Interior's Standards for the Treatment of Historic Properties for infill construction in known or potential Historic Districts or Conservation Districts to assure compatibility with the character of the districts. 				
220.	Same edit as per Policy 4.1 (City Attorney)	City Attorney	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
221.	Track changes – add Standards for Cultural Landscapes to implementation	FOMC	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
222.	Don't believe concern re: "false historicism" is valid, that it prevents compatible new construction, same comments re: SIS as per Policy 4.1	Shanahan	Revisions made.		
	Objective 5 INCORPORATE PRESERVATION GOALS INTO THE LAND USE DECISION-MAKING PROCESS.				
223.	Suggest edit to second sentence: replace "consider the impact" with "consider the importance"	NTHP	Revision made.		
224.	Track changes – edits, change from "should" to "shall"	Shanahan	Revision made.		
	<ul style="list-style-type: none"> Policy 5.1 Maintain a qualified governing body to oversee City preservation actions. 				
225.	Should include specialists in historic landscape design/interest in preserving cultural landscapes, (see also track changes)	FOMC	Revisions made.		
226.	Track changes – implementation to <i>determine best means</i> to convert Board to Commission (rather than "consider")	Damkroger	Language regarding Commission added.		
227.	Should note the qualifications for each specialty	P&T	ARG agrees with City. The list would be too detailed and might exclude cultural landscape experts.		
228.	Track changes – move implementation into Policy, with edits	Shanahan	Revisions made.		
	<ul style="list-style-type: none"> Policy 5.2 Maintain a City staff of qualified preservation professionals. 				
229.	Should include specialists in historic landscape design/interest in preserving cultural landscapes, (see also track changes)	FOMC	Omitted because there are no Secretary of the Interior's Standards for cultural landscape professionals.		
230.	Track changes – edits, training for all planners	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	<ul style="list-style-type: none"> Policy 5.3 				

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	During the planning process, evaluate the significance of resources that have the potential to be designated individually or as part of a grouping, per the guidelines set forth in Preservation Bulletin No. 16 CEQA Review Procedures for Historic Resources.				
231.	Edit: <i>During the planning process, evaluate the significance of potential historic resources that have the potential to be designated individually or as part of a grouping, per the guidelines...</i>	NTHP	Revision made.		
232.	Specify what types of planning processes this applies to	NTHP	Covered under discussion of Legal Basis.		
233.	Does not specify how Planners reach determinations	P&T	ARG agrees with City, bulletin more appropriate location for technical information.		
234.	Track changes – Edits to remove references to Bulletin 16 and move implementation into Policy	Shanahan	Shanahan comments combined with NTHP. Revisions made.		
	• Policy 5.4 Ensure that historic resource surveys are an integral component of long-range planning and Area Plan efforts.				
235.	Well-written, strong policy	P&T			
236.	Track changes – edits, add statement about designation	Shanahan	Revisions made.		
	• Policy 5.5 Include Historic Preservation Policies in all Area Plans.				
237.	Include general statement about what types of planning considerations a Preservation policy would address as part of an area plan	NTHP	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
238.	Track changes – move implementation into Policy	Shanahan	Revisions made.		
	• Policy 5.6 Consider information about historic resources, as well as the objectives and policies of this Element, in the development of zoning regulations and other regulatory policies.				
239.	Track changes – numerous edits	Shanahan	Revisions made in part.		
	• Policy 5.7 Periodically review historic preservation procedures and guidelines related to CEQA, Section 106, and Articles 10 and 11, and update as needed.				
240.	Track changes – edits	Shanahan	Revisions made.		
	• Additional Policies:				
241.	City will ensure consistency between the Preservation Element and all other General Plan Elements, including subsequent updates	NTHP	Consistency between all General Plan Elements is a goal of the City.		
242.	Add a policy or implementation to amend Article 10 and 11 to allow certain minor projects that meet SIS to be approved by staff rather	Damkroger			Planning Dept input needed.

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	than come before the LPAB.				
	Objective 6 ENCOURAGE HISTORIC PRESERVATION THROUGH INCENTIVE PROGRAMS.				
243.	Track changes – add “cultural landscapes”	FOMC	Revised to “historic resources.”		
244.	Needs elaboration, describe other benefits, Section 209.9(e), also include under Policy 5.6	P&T	Revisions made.		
	• Policy 6.1 Encourage the use of grants, loans, tax mechanisms, or other funding sources for the preservation of historic resources.				
	• Policy 6.2 Educate San Francisco’s decision makers, business leaders, neighborhood groups, and residents about the economic benefits of historic preservation.				
245.	Consider removing or restructuring statement about designation increasing property values, providing supporting information	NTHP	Removed sentence.		
246.	Track changes – mention website in Policy narrative	Shanahan	Revision made.		
	• Policy 6.3 Promote public awareness of the State Historic Building Code.				
247.	Add statement about the City using and promoting the SHBC	NTHP	Revision made.		
248.	Use code language to define SHBC, (example given – p.11 of comments)	NTHP	Revision made.		
249.	Track changes – move end of narrative to the beginning, other edits re: increasing use of the SHBC	Shanahan	Combined with comments from the NTHP.		
	• Additional Policies:				
250.	Are there other incentives the City could offer besides financial? Such as streamlined review processes, etc...	NTHP	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	Objective 7 FOSTER PUBLIC AWARENESS AND APPRECIATION OF SAN FRANCISCO’S HISTORIC RESOURCES.				
251.	Track changes – add “cultural landscapes”	FOMC	Revision made.		
252.	Role of Preservation Tech Specs should be better defined	P&T	Contradicts comments of other reviewers. Change not made.		
253.	TDRs not mentioned in Policy 5.6 or in Objective 7	P&T	Added to 6.1		

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	<ul style="list-style-type: none"> • Policy 7.1 Promote awareness among the public, including visitors, about historic resources in San Francisco. 				
254.	City should work with local groups to develop heritage tourism products and promote heritage tourism	NTHP	Revisions made to policy and/or implementation measures.		
255.	Can information also be disseminated through workshops?	NTHP	Revision made to policy and/or implementation measures.		
256.	Importance of tourism to economy, work with Convention and Visitors Bureau, include more outreach strategies	Shanahan	Covered under Objective 7 and implementation measure.		
	<ul style="list-style-type: none"> • Policy 7.2 Encourage public participation in identification of potential historic resources. 				
257.	Include language about outreach to diverse communities	NTHP	Revision made.		
258.	Include information about mechanisms for the public to submit information	NTHP	Comment addressed in Implementation.		
259.	Consider providing training for lay people to complete DPR 523 forms	NTHP	ARG agrees with City's comment that City staff constraints make this unlikely.		
260.	Track changes – add “cultural landscapes”	FOMC	Changed to “resources” which includes cultural landscapes.		
261.	How will the Planning Department encourage public to submit information	P&T	Comment addressed in Implementation.		
	<ul style="list-style-type: none"> • Policy 7.3 Encourage activities that foster awareness and appreciation of historic events and resources. 				
	<ul style="list-style-type: none"> • Additional Policies: 				
262.	Include policy about public accessibility to information (CHRID) – comment also from Policy 2.11	NTHP	CHRID too specific and not mentioned in the Cal Statewide PP. REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	Objective 8 PROMOTE THE PRINCIPLES OF SUSTAINABILITY FOR THE BUILT ENVIRONMENT THROUGH THE INHERENTLY “GREEN” STRATEGY OF HISTORIC PRESERVATION.				
263.	Edit: <i>Promote <u>Historic Preservation as a Key Strategy in Adhering to the Principles of Sustainability for the Built Environment through the Inherently “Green” Strategy of Historic Preservation.</u></i>	NTHP	Revision made.		
264.	Suggests replacement Objective statement, p. 12 of comments	NTHP	Revision made.		

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265.	Track changes – edits, more details	Shanahan	Language changed per NTHP comments and edits are no longer applicable.		
	<ul style="list-style-type: none"> Policy 8.1 Encourage sustainability of historic resources consistent with the goals and objectives of the Sustainability Plan for the City and County of San Francisco. 				
266.	Edit: <i>Promote Encourage sustainability of preservation, rehabilitation, and adaptive reuse of historic resources as a sustainable practice consistent with the goals and Objectives of the Sustainability Plan for the City and County of San Francisco.</i>	NTHP	Revision made.		
267.	Clarify that rehab is preferable to salvage, not equal	NTHP	Revision made.		
268.	Specify LEED standards	NTHP, P&T	Addressed in Implementation		
269.	Use term “sustainable” instead of “green”	NTHP	“Green” revised to “sustainable” where appropriate.		
270.	Implementation should include update to Sustainability Plan to recognized historic preservation as an important tool	NTHP	Revision made.		
271.	Implementation could include developing a salvage program and partnering on LEED programs	Damkroger	Addressed in implementation.		
272.	Track changes – edit, move implementation into Policy	Shanahan	Revision made.		
273.	Add more details about embodied energy, directly reference the recommendations of the Mayor’s Task Force on Green Building	Heritage	Language changed per NTHP		
	New Policies suggested:				
274.	<ul style="list-style-type: none"> Develop program with Dept. of the Environment.... 	Shanahan, p. 40-41	Addressed in Implementation.		
275.	<ul style="list-style-type: none"> Discourage use of vinyl windows 	Shanahan, p 41	Addressed in Implementation		
	Objective 9 PREPARE HISTORIC RESOURCES FOR NATURAL OR OTHER DISASTERS AND DEVELOP EMERGENCY PREPAREDNESS AND RESPONSE PLANS THAT CONSIDER THESE RESOURCES.				
276.	Edit: <i>Prepare Historic Resources for Natural or Other Disasters ...</i>	NTHP	Revision made.		
277.	Address emergency preparedness and care for parks during emergencies, plan for preservation of cultural landscapes (see also track changes under Policy 9.2)	Comm. Mtng.; FOMC	Cultural landscapes included in “historic resources.”		
	<ul style="list-style-type: none"> Policy 9.1 Preserve, consistent with life safety considerations, the architectural character of buildings and structures important to the unique visual image of San Francisco, and increase the 				

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	likelihood that architecturally and historically valuable structures will survive future earthquakes.				
278.	Edit: replace “earthquakes” with “disasters”	NTHP	9.1 is specifically for earthquakes and 9.2 covers all disasters.		
279.	Places undue emphasis on “visual” aesthetic value of resources	NTHP	Revision made.		
280.	Language should take into account other disasters besides earthquake and fire	NTHP	Policy 9.2 does this.		
281.	Track changes – move implementation into Policy	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	<ul style="list-style-type: none"> • Policy 9.2 Ensure that historic resources are protected in the aftermath of a disaster. 				
282.	Track changes – passage about parks used as housing during emergencies, protecting parks from harm caused by such use	FOMC	Revision made in part.		
283.	Track changes – involve Office of Emergency Services, Rec and Park, and DPW in implementation coordination	FOMC	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
284.	Track changes – note that Hurricane Katrina in 2005 is the reason New Orleans is mentioned; example does not clarify post-disaster assessment process	Damkroger; P&T	Revision made.		
285.	Track changes – move implementation into Policy	Shanahan	City staff consulted, and implementation measures will be a separate document.		
	Glossary				
286.	Important to meanings of objectives and policies, should be included in the Draft	Shanahan	Revision made.		