



SAN FRANCISCO PLANNING DEPARTMENT

August 29, 2011

Mr. Bill Wycko
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Dear Mr. Wycko,

On August 17, 2011, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed 34th America's Cup and James R. Herman Cruise Terminal and Northeast Wharf Plaza Projects. After discussion, the HPC arrived at the comments below:

- The HPC believes that the demolition and removal of historic fabric at the end of Pier 29 is a significant impact and disagrees with the analysis of this work as a less than significant impact.
- The HPC believes the proposed design of the end of Pier 29 does not meet the Secretary's Standards because it is being re-built as a much shorter pier than it was historically. Options that could meet the standards are either to should express the 'collision' with Pier 27 – since this alteration is significant in the history of Pier 29 and could be expressed in the new design, or to rebuild the end of Pier 29 to its historic configuration.
- The HPC finds that the DEIR should include a Pier 29 Restoration Alternative.
- The proposed cruise terminal building does not meet the Secretary of the Interior's Standards, particularly Standard No. 9 for compatibility with the district.
- The HPC finds the amount of proposed bus parking to be inappropriate at the Cruise Ship Terminal. Some HPC members expressed the opinion that there should not be any permanent car parking on the project site as it is incompatible with the district.
- The HPC finds the removal of a bulkhead building at Pier 27 and creation of a new plaza will change the rhythm along the Embarcadero and would be an adverse impact to the historic district.
- The HPC finds that the over scaled, vast and empty plaza development at the east end of Pier 29/Pier 27 should be considered in the EIR as an adverse impact to the historic district, and therefore be mitigated. A program and use for the plaza on non-cruise ship days should be developed for the EIR.
- Some members of the HPC find the proposed cruise terminal building incompatible with the character defining features of the historic district, and therefore an adverse impact that must be mitigated. Unlike the existing bulkhead buildings in the district, the proposed cruise terminal building will be seen as an "object" floating with vast

amount of space around it. While the contemporary design of the proposed cruise terminal building is differentiated from the existing historic buildings, it is not compatible with the historic district. The proposed design is too busy and complicated whereas the existing historic buildings are simple, direct, and straightforward.

- The HPC believes the proposed solar panels should be seamlessly integrated into the design of the roof so they are not noticeable from a distance.
- Some members believe the new design needs to be light and cheerful, rich in details but plain and simple in overall shape and form.
- For the America's Cup future development, the HPC finds the proposed mitigation measures do not go far enough to minimize large scale impacts to the historic district.
- Page 5-23 should clarify that Fort Mason is operated by the non-profit Fort Mason Center.
- Page 5-40 the acreage for the Port of Embarkation, Lower Fort Mason, and Fort Mason should be reversed.
- The HPC believes the evaluation of impacts for the Long Term Development Rights under the Host Agreement on the project site are programmatic in nature and not project-level as identified in the DEIR.
- The HPC finds the mitigation measures for impacts to the district too specific and believes there are larger impacts to the district which were not discussed and are not mitigated.
- The HPC believes Mitigation Measure CP-1a should be revised to provide greater protection and more specific review procedures prior to the development of treatment plans.
- The HPC believes the EIR has not sufficiently analyzed the impact or potential impact of the projects on the Embarcadero Historic District.
- The HPC believes there should be stronger procedures in place to allow for more HPC involvement in the review of projects in the Embarcadero and Waterfront Districts, via the City Charter and Section 1010.
- The HPC requests clarity on the procedures for reviewing potential impacts to historic resources from the America's Cup under Section 106 of the National Historic Preservation Act.

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

Sincerely,


Courtney Dankroger, Vice President
Historic Preservation Commission