



SAN FRANCISCO PLANNING DEPARTMENT

November 30, 2011

Mr. Bill Wycko
Environmental Review Officer
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Dear Mr. Wycko,

On November 2, 2011, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed Transit Center District Plan and Transit Tower. After discussion, the HPC arrived at the comments below:

- The HPC does not believe the reduced scope project should be regarded as a preservation alternative. The DEIR should include a true preservation alternative that looks at not demolishing any historic resources.
- The HPC disagrees with the finding in the DEIR that the reduced scope project will have a reduced impact to the Palace Hotel. While the reduced scope project may have less shadow impacts, there will be no difference between the proposed project and the reduced scope project to the Palace Hotel from a preservation perspective.
- The HPC suggests that the mitigation measure described in M-CP-3A should be modified to accurately reflect the historic resources needing HABS and HAER documentation.
- The HPC believes the HABS and HAER documentation should include aerial photography.
- The HPC suggests that the mitigation measure described in M-CP-3B be modified to include both written and photographic data in the public interpretative display and that the proposed display be presented to the HPC prior to finalization.
- Given the amount of demolition proposed, the HPC suggests inclusion of a salvage mitigation measure.
- The HPC would like to see impacts to the potential historic district at the intersection of 1st and Mission Streets be analyzed at the project level or reduced scope project.
- The HPC would like to see individual historic resources identified in the survey be formally designated and expansion to the existing Conservation District be implemented.
- The HPC would like to see the historic district identified at the intersection of 1st and Mission Streets be formally designated if the reduced scope project is implemented.

- The HPC believes an informational presentation or briefing prior to the DEIR hearing is warranted in order for the HPC to comment on the overall plan and proposed policies.
- The HPC disagrees with the statement made under M-CP-4 that the mitigations would result in less than a significant impact and would like to see more information on how that determination was made.
- Once developed, the HPC would like more information about the Downtown Rehabilitation Fund and In-Lieu Fee Program.
- The HPC believes the graphics and illustrations in the DEIR could be improved for consistency and clarify purposes. The DEIR should include the boundaries of the potential historic district at the intersection of 1st and Mission Streets.

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

Sincerely,

A handwritten signature in blue ink that reads "Charles Edwin Chase". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Charles Edwin Chase, President
Historic Preservation Commission