

APPENDIX C

Historic Resource Evaluations

C1 Historic Resource Evaluation Response
Part I



SAN FRANCISCO PLANNING DEPARTMENT

Historic Resource Evaluation Response

Record No.: 2017-012086ENV
Project Address: 770 WOOLSEY ST
Zoning: RH-1 RESIDENTIAL- HOUSE, ONE FAMILY Zoning District
40-X Height and Bulk District
Block/Lot: 6055/001
Staff Contact: Alesia Hsiao, Senior Environmental Planner - 415-575-9044
Alesia.Hsiao@sfgov.org
Justin Greving, Senior Preservation Planner – 415 – 575-9169
Justin.greving@sfgov.org

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

PART I: HISTORIC RESOURCE EVALUATION

PROJECT SPONSOR SUBMITTAL:

To assist in the evaluation of the proposed project, the Project Sponsor has submitted a:

- ☐ Supplemental Information for Historic Resource Determination Form (HRD)
☒ Consultant-prepared Historic Resource Evaluation (HRE Part 1)

Prepared by: Architectural Resources Group, Historic Resource Evaluation, 770 Woolsey St. (March 2019)

Staff consensus with Consultant's HRE report: ☒ Agree ☐ Disagree

Additional Comments:

Planning Staff concurs with the HRE Part 1 provided by ARG including the statement of significance and identification of character-defining features.

BUILDINGS AND PROPERTY DESCRIPTION:

- **Neighborhood:** Portola/Excelsior
- **Date of Construction:**
- **Construction Type:** Wood-Frame
- **Architect:** Unknown/Robert Nordin
- **Builder:** Unknown

770 Woolsey, also known as the University Mound Nursery, is located in the Portola/Excelsior neighborhood and is generally situated amongst single family homes constructed during the 1920s and 1930 and during the 1950s and 1960s, as well as being directly east of the San Francisco Public Utilities Commission's University Mound Reservoir. The subject property encompasses the entire 2.2-acre city block bounded by Wayland Street to the north, Hamilton Street to the east, Woolsey Street to the south, and Bowdoin Street to the west. The site was once an agricultural nursery and features 18 greenhouses arranged along a central walkway that runs north-south and acts as an axial spine for the site. The greenhouses are arranged lengthwise east to west with the short gable-ends of the greenhouses facing Bowdoin and Hamilton streets and the long ends parallel to Woolsey and Wayland streets. As shown on figure 3 of the HRE, the greenhouses are numbered 1-10 moving north along Hamilton Street and 11-18 moving north

along Bowdoin Street. Greenhouses 1 and 16-17 are partially collapsed. Although there are some minor variations in the greenhouses, most are approximately 30-34 feet wide and 110-120 feet long and are conjoined lengthwise at the base where the roof gables meet. The wood frame structures have gable ends supported by 4 rows of square wood studs set in narrow concrete foundations. Most buildings have a 2-foot tall wall covered in shiplap siding that sits on a 6-inch-high concrete foundation wall. The remaining walls and roofs of the greenhouses consist of sparsely framed wood studs that support simple glass panes measuring approximately 18 by 20 inches. No more than approximately 20 percent of the glass panes remain attached to the greenhouses as the rest have shattered or fallen on the ground.

Although the site is mostly occupied by greenhouses, the southern portion of the property is more open and contains a number of other ancillary agricultural structures. Facing Woolsey Street is a garage/storage building, mixing shed, water storage and pressure tanks, and a hand-dug well. Further east towards Hamilton is a boiler house, pesticide mixing tank, and a second hand-dug well. The northwest corner of the site is also not occupied by greenhouses and was the location of two water tanks that have since been demolished. See p. 3-15 of the HRE for a more detailed description of the site and individual features.

PRE-EXISTING HISTORIC RATING / SURVEY

- ☐ Category A – Known Historic Resource, per: _____
- ☒ Category B – Age Eligible/Historic Status Unknown
- ☐ Category C – Not Age Eligible / No Historic Resource Present, per: _____

Adjacent or Nearby Historic Resources: ☐ No ☒ Yes: _____

770 Woolsey is located east of the SFPUC University Mound Reservoir, which is part of the Hetch Hetchy Regional Water System.

CEQA HISTORICAL RESOURCE(S) EVALUATION:

Step A: Significance

Individual Significance	Historic District/Context Significance
Property is individually eligible for inclusion in a California Register under one or more of the following Criteria:	Property is eligible for inclusion in a California Register Historic District/Context under one or more of the following Criteria:
Criterion 1 - Event: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Criterion 2 - Persons: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Criterion 3 - Architecture: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Criterion 4 - Info. Potential: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Criterion 1 - Event: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Criterion 2 - Persons: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Criterion 3 - Architecture: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Criterion 4 - Info. Potential: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Period of Significance: 1925-1990	Period of Significance:
	<input type="checkbox"/> Contributor <input type="checkbox"/> Non-Contributor <input checked="" type="checkbox"/> N/A

Analysis:

Preservation staff concurs with the HRE's determination that the University Mound Nursery is eligible for listing in the California Register of Historical Resources (CRHR) under Criterion 1 as a significant cultural

landscape associated with the agricultural settlement of the Portola neighborhood by the Italian American community in the early twentieth century. Preservation staff also agree with the HRE's conclusion that the subject property is eligible under Criterion 3 as a rare vernacular cultural landscape of San Francisco. As a small-scale family-operated nursery 770 Woolsey represents an extremely rare property type for San Francisco and even the Bay Area.

The University Mound Nursery was owned and operated by the Garibaldi brothers and their descendants for almost 50 years. In 1921, 5 brothers – Vittorio, Antonio, Giovanni, Ernesto, and Gio Batta Garibaldi – purchased two city blocks from Bernard and Felicie Cassou and established the University Mound Nursery. The brothers first grew fields of flowers on the eastern block (not a part of the subject property), and slowly subdivided it so each brother could have a house, before finally selling off the remaining portion to be developed with houses between 1959 and 1962. On the western block (subject property), the brothers constructed greenhouses and by 1925 the Garibaldis had constructed two rows of 14 greenhouses along a central walkway (identified in the HRE as greenhouses #2-10 and #12-15) and the boilerhouse (a map of the subject property's site features is located on p. of the HRE and is labeled as figure 1). A well was also dug on the site by this time (identified as hand dug well #1). By 1941 greenhouses # 1 and 11 had been constructed along with the pesticide mixing tank. According to building permits, the architect Robert Nordin was responsible for the design of 4 greenhouses that were built in 1951, but it appears only #16-18 were constructed during this time along with the water storage tank.

In 1958, Steve Garibaldi, the son of Giovanni and Matilda Garibaldi, and his cousin, Andrew L. Garibaldi, the son of Antonio and Assunta Garibaldi, purchased the subject property from the other brothers and continued the farming operation. Later that year the two cousins added the garage facing Woolsey Street and installed a fence around the perimeter of the site. The cousins were also responsible for the construction of the pesticide mixing shed (built sometime between 1963 and 1965), and the water pressure tank (built ca. 1960s or later). Since the nursery closed in the early 1990s the site has remained vacant but largely intact with the most significant change being the collapse of greenhouses 1, 2, and 15-17.

The University Mound nursery represents the significant contributions of the Italian farmers in the Portola neighborhood and it is estimated that this nursery was one of over 20 similarly sized nurseries operated by Italians in the Portola during the early to mid-twentieth century. The subject property represents but one part of San Francisco's larger history as the center of an important cut flower industry that flourished during the twentieth century. In San Francisco the flower industry was dominated by three different groups that each had their own specialty: the Chinese were known for their asters, sweet peas, and pompoms; the Japanese for their chrysanthemums and greenhouse cut flowers; and the Italians for their violets, ferns, roses, carnations, and other cut flowers. According to the HRE the Garibaldis were known particularly for their roses and Steve Garibaldi was known amongst the other flower growers as the "Rose King." As one of the very last remaining greenhouses in San Francisco and the Bay Area, the subject property points to the Portola's agricultural history that has all but disappeared in the urban environment.

The subject property also represents a significant property type that was once ubiquitous in neighborhoods like Portola and the Excelsior in San Francisco that have all but vanished. The HRE provides a detailed history of the greenhouse as an architectural typology and concludes that the subject property is significant under Criterion 3 as a rare vernacular cultural landscape in San Francisco. Planning department staff agree that 770 Woolsey is a highly intact representation of an early twentieth century small-scale, family-operated commercial nursery that has become an increasingly rare property type.

The period of significance spans from 1921-1990 and encompasses the time from when the Garibaldi family purchased the subject property and began operation of the University Mound Nursery, up until 1990 with the death of Steve Garibaldi, as the nursery operation closed shortly thereafter and remained vacant.

Step B: Integrity

The subject property has retained or lacks integrity from the period of significance noted in Step A:					
Location:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks	Setting:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
Association:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks	Feeling:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
Design:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks	Materials:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
Workmanship:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks			

Analysis:
In order to be determined eligible for the CRHR, the subject building must be found to retain sufficient integrity to convey its historic significance under Criterion 1 and 3. Planning staff concur with the HRE's finding that the buildings and other structures retain all seven aspects of integrity. The site as it exists today remains largely unaltered since the Garibaldi family stopped cultivating roses there in 1990 and while a number of greenhouses may have collapsed and the buildings may be in poor condition, the site itself still retains a high degree of integrity. For a more detailed analysis of the 7 aspects of integrity, see p. 50-51 of the HRE.

Step C: Character Defining Features

The character-defining features of the subject property include the following:

Site

- Boundary encompassing the entire 240-foot-wide by 400-foot-long block and enclosed mostly by wood fencing
- Topography that slopes gently from the northwest to southeast corner
- Spatial organization of greenhouses oriented along a central north-south axis and filling the majority of the site, ancillary buildings clustered at the southern end, and small open spaces at the northwest corner and the southern end
- Axial circulation through the site via a 9-foot wide pathway extending north-south through the center of the site
- Surviving rose plants within the greenhouses

Greenhouses

- Rectangular plans with short gabled ends facing Bowdoin and Hamilton streets
- Location in two parallel rows with the majority abutting each other
- One-story height
- Asymmetrical gable roofs
- Wood structural system with wood studs, rafters, and mullions
- Perimeter concrete foundation
- Horizontal wood cladding along the base
- Sliding wood doors, some with concrete steps
- Louver panels with associated chains and sprockets
- Wood box gutters and metal downspouts
- Narrow concrete walkways adjacent to the exterior facades

Boiler House

- Rectangular plan, one-story height, wood frame building
- Asymmetrical gable roof with no overhand and rolled roofing
- Horizontal wood v-groove cladding
- Openings including hinged door on east façade, five-light wood-sash clerestory window on south façade, and wood louvered panels at gable ends
- Tall metal smoke stack

Garage/Storage Building

- Rectangular plan, one-story height, wood-frame
- Shallow gable roof with wide eave overhangs
- Horizontal wood v-groove siding
- Garage doors on north and south facades
- Multi-light, steel sash windows on north and south facades

Mixing Shed

- Rectangular plan, one-story height, wood-frame building
- Shed roof
- Vertical wood v-groove siding
- Hinged door on north façade
- Associated piping connecting to water storage and pressure tanks

Infrastructure

- All extant water and small-scale features (secondary), including two hand-dug wells; water storage tank; water pressure tank; pesticide mixing tank; the system of piping, both above and belowground, to convey water, steam, and pesticides to the greenhouses; and the water drainage channel extending along the central pathway and terminating at the garage/storage building

CEQA HISTORIC RESOURCE DETERMINATION:

- ☒ Individually-eligible Historical Resource Present
- ☐ Contributor to an eligible Historical District / Contextual Resource Present
- ☐ Non-contributor to an eligible Historic District / Context / Cultural District
- ☐ No Historical Resource Present

NEXT STEPS:

- ☒ HRER Part II Review Required
- ☐ Categorically Exempt, consult:
- ☐ Historic Design Review
 - ☐ Design Advisory Team
 - ☐ Current Planner

PART I: PRINCIPAL PRESERVATION PLANNER REVIEW

Signature: Allison K. Vanderslice Digitally signed by Allison K. Vanderslice
Date: 2020.05.04 16:00:28 -07'00'

Date: _____

Allison Vanderslice, *Principal Preservation Planner*

CEQA Cultural Resources Team Manager, Environmental Planning Division

CC: Kimberly Durandet, Senior Current Planner
Alana Callagy, Senior Environmental Planner



Figure 1: Aerial view of 770 Woolsey showing key structures and buildings on site (image courtesy of HRE Part 1, p. 5)



Figure 2: View west of the northwest corner of Woolsey and Hamilton streets. (image courtesy of google maps)



Figure 3: View southeast of northwest corner of site at the intersection of Wayland and Bowdoin streets (SF Planning Department)



Figure 4: View west of the south elevation of greenhouse #11 (SF Planning Department)



Figure 5: Interior view of greenhouses (SF Planning Department)



Figure 6: Although the site has been vacant since the 1990s roses continue to grow in some areas (SF Planning Department)

C2 Historic Resource Evaluation Response Part II



PART II HISTORIC RESOURCE EVALUATION RESPONSE

Record No.: 2017-012086ENV
Project Address: 770 Woolsey
Zoning: RH-1 RESIDENTIAL – House, ONE FAMILY Zoning District
40-X Height and Bulk District
Block/Lot: 6055/001
Staff Contact: Justin Greving, Senior Preservation Planner – (628) 652 – 7553
Justin.greving@sfgov.org

PART I: Historic Resource Summary

As stated in the Historic Resource Evaluation Response Part 1 dated May 4, 2020 (HRER Part 1), the subject property at 770 Woolsey, University Mound Nursery, is individually eligible for listing in the California Register of Historical Resources (CRHR) under Criterion 1 as a significant cultural landscape associated with the agricultural settlement of the Portola neighborhood by the Italian American community in the early twentieth century. 770 Woolsey is also eligible under Criterion 3 as a rare vernacular cultural landscape of San Francisco. As a small-scale family-operated nursery 770 Woolsey represents an extremely rare property type for San Francisco and even the Bay Area. The period of significance spans from 1921-1990 and encompasses the time from when the Garibaldi family purchased the subject property and began operation of the University Mound Nursery, up until 1990 with the death of Steve Garibaldi, as the nursery operation closed shortly thereafter and remained vacant. The site as it exists today remains largely unaltered since the Garibaldi family stopped cultivating roses there in 1990 and while a number of greenhouses may have collapsed and the buildings may be in poor condition, the site itself still retains a high degree of integrity.

Character-defining features of the subject property include the following:

Site

- Boundary encompassing the entire 240-foot-wide by 400-foot-long block and enclosed mostly by wood fencing
- Topography that slopes gently from the northwest to southeast corner
- Spatial organization of greenhouses oriented along a central north-south axis and filling the majority of the site, ancillary buildings clustered at the southern end, and small open spaces at the northwest corner and the southern end
- Axial circulation through the site via a 9-foot wide pathway extending north-south through the center of the site
- Surviving rose plants within the greenhouses

Greenhouses

- Rectangular plans with short gabled ends facing Bowdoin and Hamilton streets
- Location in two parallel rows with the majority abutting each other
- One-story height

- Asymmetrical gable roofs
- Wood structural system with wood studs, rafters, and mullions
- Perimeter concrete foundation
- Horizontal wood cladding along the base
- Sliding wood doors, some with concrete steps
- Louver panels with associated chains and sprockets
- Wood box gutters and metal downspouts
- Narrow concrete walkways adjacent to the exterior facades

Boiler House

- Rectangular plan, one-story height, wood frame building
- Asymmetrical gable roof with no overhand and rolled roofing
- Horizontal wood v-groove cladding
- Openings including hinged door on east façade, five-light wood-sash clerestory window on south façade, and wood louvered panels at gable ends
- Tall metal smoke stack

Garage/Storage Building

- Rectangular plan, one-story height, wood-frame
- Shallow gable roof with wide eave overhangs
- Horizontal wood v-groove siding
- Garage doors on north and south facades
- Multi-light, steel sash windows on north and south facades

Mixing Shed

- Rectangular plan, one-story height, wood-frame building
- Shed roof
- Vertical wood v-groove siding
- Hinged door on north façade
- Associated piping connecting to water storage and pressure tanks

Infrastructure

- All extant water and small-scale features (secondary), including two hand-dug wells; water storage tank; water pressure tank; pesticide mixing tank; the system of piping, both above and belowground, to convey water, steam, and pesticides to the greenhouses; and the water drainage channel extending along the central pathway and terminating at the garage/storage building

PART II: Project Determination:

Based on the Historic Resource Evaluation in Part I and the assessment below, the project's scope of work:

- ☒ **Will** cause a significant impact to the individual historic resource as proposed.
- ☐ **Will** cause a significant impact to a historic district / context as proposed.
- ☐ **Will not** cause a significant impact to the individual historic resource as proposed.
- ☐ **Will not** cause a significant impact to a historic district / context as proposed.

PART II: Project Evaluation

Proposed Project:	Per Drawings Dated:
<input checked="" type="checkbox"/> Demolition / New Construction <input type="checkbox"/> Alteration	10/27/2020

PROJECT DESCRIPTION

The proposed project includes demolition of almost all existing structures on the site (including the perimeter wood fence), and the construction of 62 dwelling units comprised of 31 duplexes. The project will also include 62 parking spaces. The southeast corner of the site is to be used as an open space that will retain or rebuild some character-defining features of the site including the boiler house and greenhouses 1 and 2.

PROJECT EVALUATION

The proposed project's conformance with the Secretary of the Interior's Standards:			
Standard 1 – Minimal Change:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Standard 2 – Maintain Character:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Standard 3 – Avoid Conjecture:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Standard 4 – Acquired Significance:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Standard 5 – Building Techniques:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Standard 6 – Repairment:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Standard 7 – Treatments:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Standard 8 – Archeology:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Standard 9 – Compatibility:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Standard 10 – Reversibility:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A

PROJECT IMPACT ANALYSIS

While the majority of the character-defining site features on the site will be removed as part of the proposed project, there are a few that will be retained. The topography that slopes gently from the northwest to the southeast corner will not be removed as part of the proposed project. Additionally, the axial circulation pattern through the site will be partially maintained through the location of the duplexes around a landscaped center portion of the site, although this landscaped portion will not be the same width of the existing axial circulation, nor is it the same length. Additionally, there is an intention to protect the existing rose plants on the site so that they could be replanted or incorporated within the landscape plan in some way. However, all other character-defining site features will be removed as part of the proposed project.

Most of the structures on the site are proposed to be demolished, including greenhouses 3-18, the garage/storage building, and the mixing shed. Greenhouses 1 and 2 and the boiler house are proposed to be retained or reconstructed with the same dimensions and in their same locations.

The boundary of the site that is enclosed mostly by wood fencing will be removed, as will the spatial organization of greenhouses oriented along a central north-south axis and ancillary buildings clustered at the southern end. While the open space at the southeastern end of the site will be retained and used as a park, the open space at the southwestern corner will be developed.

All of the character-defining infrastructure is also proposed to be removed, including the two-hand dug wells, water storage tank, water pressure tank, pesticide mixing tank, the system of piping (above and below ground), and the water drainage channel along the central pathway.

Despite the retention of some character-defining site features, the majority of the character-defining site features, buildings, and infrastructure will be removed as part of the proposed project. While some features related to the site's agricultural history will remain, the extensive removal of most character-defining features combined with the development of 62 units of housing across the site is such that 770 Woolsey will no longer be able to convey its historical significance as a cultural landscape associated with the agricultural settlement of the Portola neighborhood and as a rare vernacular cultural landscape in the form of a family-operated nursery. The extensive demolition will remove historic materials, features, and spaces that characterize the property and would result in physical destruction, damage or alteration such that the significance of the individual historical resource would be materially impaired. As such, staff finds that the proposed project would result in a significant unavoidable impact to 770 Woolsey Street.

MITIGATION MEASURES

Because it is determined that the proposed project will cause a significant unavoidable impact to 770 Woolsey Street, the Department requires the following Mitigation Measures to reduce impacts to the historic resource. Although these measures may reduce impacts to historic resources through the documentation of the affected property and presentation of the findings to the community, they will not reduce the impact to a less-than-significant-level. Only avoidance of substantial adverse changes would reduce impacts to less-than-significant levels. Although the following mitigation measures have been identified they may be amended and additional measures may be required as the project develops.

Mitigation Measure 1: Documentation of Historical Resource(s)

Mitigation Measure 2: Interpretive Program

Mitigation Measure 3: Salvage Plan

Mitigation Measure 4: Retention of Roses

The project sponsor will protect the existing roses that are currently growing on the site and will relocate them off site prior to any demolition. The roses will be incorporated into the landscape plan as well as the interpretation plan.

CONCLUSION

Although these mitigation measures may reduce impacts to historic resources through the documentation of the affected property and presentation of the findings to the community, they will not reduce the impact to a less-than-significant-level. Only avoidance of substantial adverse changes would reduce impacts to less-than-significant levels. Therefore, the impact to the identified historic resource at 770 Woolsey will be significant and unavoidable.

PART II: Approval

Signature: Allison Vanderslice

Date: 11/24/2020

Allison Vanderslice, *Principal Preservation Planner*

CEQA Cultural Resources Team Manager, Environmental Planning Division

CC: Alana Callagy, Senior Environmental Planner, Environmental Planning Division
Kimberly Durandet, Senior Current Planner, Current Planning Division

C3 Preservation Alternatives Memorandum

PRESERVATION ALTERNATIVES ANALYSIS

770 Woolsey Street San Francisco, California

San Francisco Planning Department | December 2020

*Architecture
Planning
Conservation*



Architectural
Resources Group



Preservation Alternatives Analysis

770 Woolsey Street

San Francisco, California

December 2020

TABLE OF CONTENTS

1. Introduction.....	1
<i>Methodology</i>	<i>2</i>
2. Summary of Significance	5
<i>Statement of Significance.....</i>	<i>5</i>
<i>Period of Significance</i>	<i>6</i>
<i>Character-defining Features</i>	<i>6</i>
3. Project Description	7
4. Full Preservation Alternative	8
<i>Description of the Alternative</i>	<i>8</i>
<i>Analysis for Conformance with the Standards for Rehabilitation.....</i>	<i>9</i>
<i>Impact Analysis under CEQA.....</i>	<i>12</i>
5. Partial Preservation Alternative.....	13
<i>Description of Alternative.....</i>	<i>13</i>
<i>Analysis for Conformance with the Standards for Rehabilitation.....</i>	<i>14</i>
<i>Impact Analysis under CEQA</i>	<i>16</i>
6. Preservation Alternatives Considered but Rejected	17
7. Conclusion	18
8. Bibliography.....	19

Appendix

Preservation Alternatives Graphics Package

1. INTRODUCTION

At the request of the San Francisco Planning Department and the project sponsor L37 Partners, Architectural Resources Group (ARG) has prepared this Preservation Alternatives Analysis for the proposed project at 770 Woolsey Street (Block 6055, Lot 001) in San Francisco. The subject property encompasses the entire block bounded by Wayland Street to the north, Hamilton Street to the east, Woolsey Street to the south, and Bowdoin Street to the west in the Portola neighborhood. The property contains greenhouses and other infrastructure that were operated as the University Mound Nursery by the Garibaldi family for seven decades (Figure 1). Founded in 1921, the Garibaldi family operated this successful small-scale nursery, growing a variety of flowers for the thriving cut flower market in San Francisco until the early 1990s. Over time, other cut flower nurseries in the Portola neighborhood were demolished, leaving the University Mound Nursery as the sole example of this property type that characterized the neighborhood landscape for nearly a century.



Figure 1. Site map of 770 Woolsey Street with construction dates for extant and demolished features (Pictometry, amended by author)

In March 2019, ARG prepared an Historic Resource Evaluation (HRE) Part 1 report for 770 Woolsey Street and found that the property qualifies for listing in the California Register of Historical Resources (California Register) under Criteria 1 and 3 as a significant cultural landscape comprised of an early twentieth century nursery established by Italian immigrants in the Portola neighborhood. Despite remaining vacant for the past three decades, it retains a high level of integrity.¹ In May 2020, the San Francisco Planning Department issued an Historic Resource Evaluation Response (HRER) Part I memo, concurring with the statement of significance, eligibility for listing in the California Register under Criteria 1 and 3, and identification of character-defining features presented in the March 2019 HRE Part 1 report.² As such, the property is an individual historical resource for the purposes of environmental review under the California Environmental Quality Act (CEQA).

The proposed project includes the demolition of almost all existing structures on the site (including the perimeter wood fence) and the construction of 62 dwelling units comprised of 31 duplexes. The project will also include 62 parking spaces. The southeast corner of the site will be used as open space that will retain or rebuild some character-defining features of the site, including Greenhouses #1 and #2 and the boiler house. In November 2020, the San Francisco Planning Department issued an HRER Part II memo (Project Evaluation) that concludes that the proposed project does not comply with the Secretary of the Interior's Standards for Rehabilitation and therefore constitutes a significant impact to the historical resource under CEQA. The memo also includes a revised list of character-defining features.³

This report analyzes two preservation alternatives to the proposed project to be included in the 770 Woolsey Street Environmental Impact Report (EIR): the Full Preservation Alternative and the Partial Preservation Alternative. Alternatives to a proposed project are developed to consider alternate schemes that would avoid or lessen significant project impacts resulting from demolition, additions, and related new construction.⁴ This report provides a description for both alternatives and an evaluation of impacts associated with each alternative. It also discusses the alternatives considered but rejected. Graphics illustrating the proposed project and preservation alternatives are appended.

Methodology

The preservation alternatives presented in this report were developed with input from ARG, project sponsor L37 Partners, and project architects IwamotoScott Architecture. Development of the alternatives has also been completed under the direction of the San Francisco Planning Department. This analysis focuses on the treatment of the existing historical resource at 770 Woolsey Street, proposed alterations and new construction under the Full Preservation and Partial Preservation Alternatives, as well as the impacts of these changes on the character-defining features of the resource

¹ Architectural Resources Group, "770 Woolsey Street, San Francisco, California, Historic Resource Evaluation," prepared for 140 Partners LP, March 2019.

² San Francisco Planning Department, "Historic Resource Evaluation Response, Part I: Historic Resource Evaluation, 770 Woolsey Street, Record No. 2017-012086ENV," May 4, 2020.

³ San Francisco Planning Department, "Historic Resource Evaluation Response, Part II: Project Evaluation, 770 Woolsey Street, Record No. 2017-012086ENV," November 9, 2020, and summary of the project description provided by the project sponsor.

⁴ This preservation alternatives analysis complies with San Francisco Historic Preservation Commission "Resolution No. 0746, Adoption of a Policy Statement to Clarify Historic Preservation Commission Expectations for the Development and Evaluation of Preservation Alternatives in Environmental Impact Reports for the Purposes of the California Environmental Quality Act," adopted on March 18, 2015.

delineated in Section 2. The Full Preservation and Partial Preservation Alternatives are evaluated for conformance with the Secretary of the Interior's Standards for Rehabilitation.

California Environmental Quality Act

This analysis examines the character-defining features that would be affected by each proposed alternative, and then determines whether the alternative would cause a significant impact to the historical resource per CEQA. To evaluate potential impacts of each alternative, this memorandum draws primarily on CEQA Guidelines Section 15064.5, "Determining the Significance of Impacts to Archaeological and Historical Resources." Relevant sections are presented below:

(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

(3) Generally, a project that follows the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (1995, revised 2017), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.⁵

Secretary of the Interior's Standards

The Secretary of the Interior's Standards (Standards) are a series of concepts developed by the U.S. Department of the Interior to assist in the continued preservation of a property's historical significance through the preservation of character-defining materials and features. They are intended to guide the appropriate maintenance, repair, and replacement of historic materials and to direct the design of compatible new additions or alterations to historic buildings. The Standards are used by federal, state, and local agencies to review both federal and nonfederal rehabilitation proposals.

⁵ California Environmental Quality Act (CEQA) Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Article 5, Preliminary Review of Projects and Conduct of Initial Study (Sections 15060-15065), accessed August 28, 2020, <https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-5-preliminary-review-of-projects-and-conduct-of-initial-study>.

In California, properties listed in, or formally determined eligible for listing in, the California Register or a local historic register qualify as historical resources under CEQA and must be considered in the environmental review process. (Resources formally determined eligible for, or listed in, the National Register of Historic Places are automatically listed in the California Register.) In general, a project involving a historical resource that has been determined to comply with the Secretary of the Interior's Standards can be considered a project that will not cause a significant impact on the historical resource per CEQA.

The Standards offer four approaches to the treatment of historic properties—preservation, rehabilitation, restoration, and reconstruction. The Standards for Rehabilitation (codified in 36 CFR 67 for use in the Federal Historic Preservation Tax Incentives program) address the most prevalent treatment. Rehabilitation is defined as “the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values.”⁶ The ten Standards for Rehabilitation are:

- 1) A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
- 2) The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
- 3) Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
- 4) Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
- 5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
- 6) Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
- 7) Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
- 8) Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

⁶ National Park Service, Technical Preservation Services, “Standards for Rehabilitation,” *The Secretary of the Interior's Standards*, accessed January 31, 2020, <https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm>.

- 9) New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- 10) New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

2. SUMMARY OF SIGNIFICANCE

The following statement of significance and description of the period of significance for 770 Woolsey Street have been excerpted from the March 2019 HRE Part 1 report. The revised list of character-defining features has been excerpted from the November 2020 HRER Part II memo.

Statement of Significance

The University Mound Nursery at 770 Woolsey Street is eligible for listing in the California Register under Criterion 1 as a significant cultural landscape associated with the agricultural settlement of the Portola neighborhood by the Italian American community in the early twentieth century. In addition to dairies and vegetable and duck farms, Portola became home to upward of twenty small-scale, family-run nurseries established by Italian immigrants. By operating efficiently within one to two city blocks, employing family members, and living on site, Italian flower growers in the Portola earned a profit and in turn, sustained San Francisco's thriving cut flower market in conjunction with Japanese and Chinese growers. The five Garibaldi brothers, who had emigrated from Genoa, Italy, in the preceding decades, founded the University Mound Nursery shortly after purchasing two adjacent blocks in the Portola neighborhood in 1921. The family operated the nursery for nearly seventy years, thereby contributing both to the neighborhood's and San Francisco's floriculture industry.

Additionally, the subject property is eligible for the California Register under Criterion 3 as a rare vernacular cultural landscape in San Francisco. The city's early twentieth century nurseries were efficiently laid out with fields of flowers, rows of greenhouses accessed by narrow walkways, ancillary buildings clustered together, and single-family homes located at the margin. Although only the western portion of the nursery survives, it retains the compact spatial layout, orderly rows of greenhouses serrated with gable roofs, hand-dug wells, and small-scale buildings, including the original boiler house with its distinctive smokestack. The small-scale, family-operated commercial nursery is an extremely rare property type, both in the city and the San Francisco Bay Area, with the majority of the nurseries demolished and redeveloped for other uses.

The property was found ineligible for listing in the California Register under Criterion 2. The five founding Garibaldi brothers, followed by the second generation, Steve and Andrew Garibaldi, operated a successful, family-owned nursery, growing roses and other plants for the cut flower market in San Francisco and beyond. Although they operated a successful business in San Francisco, the Garibaldi family members are not known to have made broader contributions to the cut flower industry or to the Italian American community in San Francisco. Rather their contributions to the industry and settlement of the Portola neighborhood are best reflected under Criterion 1. Therefore, the subject property does not appear to meet the threshold for listing in the California Register under this criterion.

Period of Significance

The period of significance spans from 1921 when the Garibaldi brothers purchased the property to 1990 when the third generation flower-grower Steve Garibaldi unexpectedly passed away, and the business closed shortly thereafter. Despite the vacancy of the subject property since the early 1990s, the former University Mound Nursery at 770 Woolsey Street retains a high level of integrity. The majority of the greenhouses; the boiler house and other support buildings; surviving rose plants; unpaved surface; and layout and circulation pattern of the site remain intact.

Character-defining Features

A character-defining feature is an aspect of a building or structure's design, construction, or detail that is representative of its function, type, or architectural style. Generally, character-defining features include specific building systems, architectural ornament, construction details, massing, materials, craftsmanship, site characteristics, and landscaping built or installed within the period of significance. In order for an important historic property to retain its significance, its character-defining features must be retained to the greatest extent possible.

Character-defining features of 770 Woolsey Street include those pertaining to the overall site as well as individual buildings and structures:

Site
Boundary encompassing the entire 240-foot-wide by 400-foot-long block and enclosed mostly by wood fencing
Topography that slopes gently from the northwest to southeast corner
Spatial organization of greenhouses oriented along a central north-south axis and filling the majority of the site, ancillary buildings clustered at the southern end, and small open spaces at the northwest corner and southern end
Axial circulation through the site via a nine-foot-wide pathway extending north-south through the center of the site
Surviving rose plants within the greenhouses
Greenhouses
Rectangular plans with the short gabled ends facing Bowdoin and Hamilton streets
Location in two parallel rows with the majority abutting each other
One-story height
Asymmetrical gable roofs
Wood structural system with wood studs, rafters, and mullions
Perimeter concrete foundation
Horizontal wood cladding along the base
Sliding wood doors, some with concrete steps
Louver panels with associated chains and sprockets
Wood box gutters and metal downspouts
Narrow concrete walkways adjacent to the exterior façades
Boiler House
Rectangular plan, one-story height, wood frame
Asymmetrical gable roof with no overhang and rolled roofing
Horizontal wood v-groove cladding

Openings, including hinged door on the east façade, five-light wood-sash clerestory window on the south façade, and wood louvered panels at the gable ends
Tall metal smoke stack
Garage/Storage Building
Rectangular plan, one-story height, wood frame
Shallow gable roof with wide eave overhang
Horizontal wood v-groove siding
Garage doors on the north and south façades
Multi-light, steel sash windows on the north and south façades
Mixing Shed
Rectangular plan, one-story height, wood frame
Shed roof
Vertical wood v-groove cladding
Hinged door on the north façade
Associated piping connecting to water storage and pressure tanks
Infrastructure
All extant water and small-scale features (secondary), including two hand-dug wells; water storage tank; water pressure tank; pesticide mixing tank; the system of piping, both above and belowground, to convey water, steam, and pesticides to the greenhouses; and the water drainage channel extending along the central pathway and terminating at the garage/storage building

3. PROJECT DESCRIPTION

Project Sponsor's Objectives

The project sponsor would like to achieve the following objectives by undertaking the proposed project:

- Develop a mixed-income residential development consistent with and maximize housing density pursuant to the Planning Code within project site constraints and incorporating on-site affordable units.
- Replace an abandoned commercial cut-flower lot with residential uses and design consistent with the surrounding Portola neighborhood without displacement.
- Contribute to the city's goal as designated in the General Plan of maximizing housing potential in keeping with the character of the Portola District neighborhood.
- Provide public open space and replicate some site conditions to preserve elements of the historical uses.
- Provide adequate light and air to all housing units in the new development.
- Develop a project that is financially feasible and able to support the equity and debt returns as required by investors and lenders without public subsidy.

Project Sponsor's Description

The following project description was provided by the project sponsor:

- The majority of the existing greenhouses and associated buildings and structures would be demolished, and the site would be developed with 62 duplex units and public and private open space. The project would result in approximately 124,900 square feet of residential area consisting of three-story attached duplexes.
- The design of the new residential architecture would reference the existing asymmetrical gable rooflines of the greenhouses and the rhythm of existing neighborhood homes' rectangular fenestration.
- Private open space landscaping would consist of a central spine similar to the existing central pathway between the existing greenhouses.
- Approximately 16,320 square feet of public open space would be developed at the corner of Woolsey and Hamilton streets (southeast corner of the site). Greenhouses #1 and #2 and the boiler house would be rebuilt in the original size and location.
- Surviving rose plants would be replanted throughout the site.

4. FULL PRESERVATION ALTERNATIVE

Description of the Alternative

The following description summarizes the Full Preservation Alternative. The graphic package detailing this alternative is appended to this document.

- Twenty-four housing units featuring the same architecture and massing as the proposed project would be developed on the west side of the lot fronting Bowdoin and Wayland streets. The new housing would be bordered by Greenhouse #11 to the south and the central pathway to the east.
- The duplexes facing Bowdoin Street would be arranged in tandem (with a front and rear unit) in parallel rows complementing the existing orientation and arrangement of the greenhouses. The new duplexes fronting Wayland Street would form a slightly taller, denser massing than those fronting Bowdoin Street.
- Greenhouses #12, #13, #14 and #18 and remnants of Greenhouses #15-17 would be demolished, because they are located within the footprint of the new housing.
- Approximately 1.45 acres open space with existing greenhouses (Greenhouses #1-10 and #11) and other contributing buildings, structures, and small-scale features (including the boiler house, garage/storage building, pesticide mixing tank, water pressure tank, water storage tank, pesticide mixing tank, and two hand-dug wells) would be rehabilitated following the Secretary of the Interior's Standards.
- The portion of the property that would be retained, including the greenhouses, would be given a compatible new use, such as community garden space.

- Surviving rose plants would be replanted within the site.

The Full Preservation Alternative would retain the majority of the character-defining features of the site, including the majority of the greenhouses, central pathway, and the ancillary buildings, structures, and small-scale features at the south end of the property. The character-defining features specific to the greenhouses and individual buildings and structures would be retained in the surviving buildings and structures.

Character-defining Feature	Retained	Partially Retained	Not Retained
Boundary encompassing the entire block	X		
Topography that slopes from the northwest to southeast corner	X		
Spatial organization of greenhouses, ancillary buildings, and open spaces	X		
Axial circulation through the site via a nine-foot-wide pathway	X		
Surviving rose plants	X		

Analysis for Conformance with the Standards for Rehabilitation

The following section evaluates the Full Preservation Alternative for conformance with the Secretary of the Interior's Standards for Rehabilitation.

Standard 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

The portion of the property that would be retained would be given a compatible new use, such as community garden space. The horticultural use of the site would not require modifications to the character-defining features beyond rehabilitating the existing buildings, structures, and small-scale features within the boundary of the proposed public open space. The majority of the character-defining features, including Greenhouses #1-11 and the supporting infrastructure, including water and pesticide storage and conveyance, would remain. Site circulation, including the central pathway and the open space at the south end of the property, would be retained. The retention of the full row of greenhouses along Hamilton Street would convey the overall scale of the site and the massing and distinctive repetition of the gable roofs of the structures. The new housing would be developed in the northwest quadrant of the site, within a rectangular footprint that conforms to the existing footprint of the greenhouses. The greenhouses proposed for demolition include three that have already collapsed (#15-17). As such, the proposed location of new construction maximizes the retention of intact character-defining features. Although the Full Preservation Alternative would physically alter the site and result in the demolition of some contributing greenhouses, the overall historic character of the site would remain. It would be evident that the entire block had functioned as a nursery.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Standard 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

See the discussion under Standard 1. The proposed project would retain the majority of the character-defining features. The majority of the historic greenhouses and all of the supporting structures and small-scale features, surviving rose plants, and the overall plan and circulation would remain. Although a row of greenhouses (#12-18) would be demolished, this area has been compromised through the collapse of three greenhouses (Greenhouses #15-17) following the site's closure in the early 1990s. The historic character of the site would be retained despite the removal of some contributing greenhouses.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Standard 3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Conjectural features or other elements that would create a false sense of historical development are not proposed under this alternative. No new construction would occur outside of the footprint of the proposed new housing. No greenhouse infrastructure from other nurseries would be relocated to this property. Although the design has not been finalized, the new housing would appear contemporary and distinct from the historic nursery (as described below under Standard 9), such that it would be clear that it was not constructed by or associated with the Garibaldi family's development and use of the site.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Standard 4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

The broad period of significance (1921-1990) encompasses all of the extant character-defining features. No new construction or alterations (beyond the physical deterioration of select buildings and structures) have occurred since the Garibaldi family closed the nursery in the early 1990s. As such, the property does not contain changes that have acquired significance in their own right.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Standard 5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

See the discussion under Standards 1 and 2. This alternative would retain the majority of the greenhouses and all of the other extant buildings, structures, and small-scale features. These character-defining features would be rehabilitated following the Secretary of the Interior's Standards. Thus, the construction material, features, and distinctive construction and craftsmanship for the majority of the site (including the character-defining features of individual buildings and structures listed above in Section 2) would be retained.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Standard 6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

Although a condition assessment has not been completed to understand the current condition and treatment recommendations, the character-defining features to be retained would be repaired when feasible. Features that are severely deteriorated (such as sections of the wood framing of Greenhouse #1) would be replaced using the same design, color, texture, and material of the original structures.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Standard 7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Although cleaning treatments, both chemical and physical, have not been determined, they would follow the Secretary of the Interior's Standards and would be undertaken using the gentlest means possible.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Standard 8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

The San Francisco Planning Department's procedures for the treatment of archaeological resources would be implemented should these resources be encountered during construction of the Full Preservation Alternative.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Standard 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

See the discussion above under Standards 1 and 2. No additions or exterior alterations the building, structures, and small-scale features to be retained are proposed. The new housing is located within a discrete footprint at the northeast quadrant of the site; this location would minimize the number of greenhouses to be demolished. Thus, the majority of the character-defining features would remain. Although the design has not been finalized, the new housing would complement the greenhouses by echoing the asymmetrical gable roofs while featuring a contemporary design. This would achieve a compatible design that does not explicitly replicate original building fabric.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Standard 10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Response: This alternative would result in the irreversible loss of some character-defining features of the site. However, the majority of the features would be rehabilitated and the essential form and integrity of the site would be retained. The new housing would be detached from the contributing buildings, structures, and small-scale features, and the removal of the duplex units would not impact the remaining character-defining features of the property.

The Full Preservation Alternative as proposed would be in conformance with this Standard.

Impact Analysis under CEQA

Based on the analysis presented above, the Full Preservation Alternative appears to be in conformance with the Secretary of the Interior's Standards for Rehabilitation. A substantial number of character-defining features of 770 Woolsey Street would be preserved and would convey the property's historic significance. Under CEQA, a project's impact will generally be considered mitigated below a level of significance and thus is not significant if it complies with the Standards.

The Full Preservation Alternative would meet the following project objectives:

Project Objective	Completely	Partially	Not at All
Develop a mixed-income residential development consistent with and maximize housing density pursuant to the Planning Code within project site constraints and incorporating on-site affordable units.		X	
Replace an abandoned commercial cut-flower lot with residential uses and design consistent with the surrounding Portola neighborhood without displacement.		X	
Contribute to the city's goal as designated in the General Plan of maximizing housing potential in keeping with the character of the Portola District neighborhood.		X	
Provide public open space and replicate some site conditions to preserve elements of the historical uses.	X		
Provide adequate light and air to all housing units in the new development.	X		
Develop a project that is financially feasible and able to support the equity and debt returns as required by investors and lenders without public subsidy.			X

5. PARTIAL PRESERVATION ALTERNATIVE

Description of Alternative

The following description summarizes the Partial Preservation Alternative. The graphic package detailing this alternative is appended to this document.

- Forty housing units of the same architecture and massing as the proposed project would be developed on the northern portion of the site, fronting Bowdoin, Wayland, and Hamilton streets. The new housing would be bordered by Greenhouses #3 and 13 to the south, and the central pathway would extend through the new construction.
- The duplexes facing Bowdoin and Hamilton streets would be arranged in tandem (with a front and rear unit) in parallel rows complementing the existing orientation and arrangement of the greenhouses. The new duplexes fronting Wayland Street would form a slightly taller, denser massing than those fronting Bowdoin Street.
- Greenhouses #4-10, #14, #18 and remnants of Greenhouses #15-17 would be demolished, because they are located within the footprint of the new housing.
- Approximately 0.9 acre of public open space with existing greenhouses and other contributing buildings, structures, and small-scale features (including Greenhouses #1-3 and #11-13 and the boiler house, garage/storage building, pesticide mixing tank, water pressure tank, water storage tank, pesticide mixing tank, and two hand-dug wells) would be rehabilitated following the Secretary of the Interior's Standards.
- The portion of the property that would be retained, including the greenhouses, would be given a compatible new use, such as community garden space.
- Surviving rose plants would be replanted throughout the site.

The Partial Preservation Alternative would retain some of the character-defining features of the site, including the majority of the greenhouses, central pathway, and the ancillary buildings, structures, and small-scale features at the south end of the property. The character-defining features specific to the greenhouses and individual buildings and structures would be retained in the surviving buildings and structures. Under this preservation alternative, however, the majority of the greenhouses would be demolished.

Character-defining Feature	Retained	Partially Retained	Not Retained
Boundary encompassing the entire block	X		
Topography that slopes from the northwest to southeast corner	X		
Spatial organization of greenhouses, ancillary buildings, and open spaces		X	
Axial circulation through the site via a nine-foot-wide pathway	X		
Surviving rose plants	X		

Analysis for Conformance with the Standards for Rehabilitation

Standard 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

Under the Partial Preservation Alternative, the portion of the property that would be retained would be given a compatible new use, such as community garden space. The horticultural use of the site would not require modifications to the character-defining features beyond rehabilitating the existing buildings, structures, and small-scale features within the proposed public open space. Site circulation, including the central pathway and the open space at the south end of the property, would be retained. However, the accommodation of a new residential use in the northern half of the site would require the demolition of the majority of the greenhouses (#4-10 and #14-18) and would result in a substantial change to the distinctive materials, features, and spatial relationships that characterize the site. In particular, the overall scale of the nursery operation and the massing and distinctive repetition of the gable roofs of the greenhouses would be diminished through the demolition of the majority of the greenhouses along Hamilton Street. The overall historic character of the site would be greatly compromised by the new housing development.

The Partial Preservation Alternative as proposed would not be in conformance with this Standard.

Standard 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

See the discussion under Standard 1. The proposed alternative would result in the loss of a significant number of the contributing greenhouses, resulting in a loss of the scale, spatial relationship, and historic material of these structures and compromising the integrity of 770 Woolsey Street. While the southern portion of the site designated as public open space would retain character-defining features that convey the site's historic use as a nursery, the full use of the entire block as a commercial cut-flower operation would be irreversibly lost.

The Partial Preservation Alternative as proposed would not be in conformance with this Standard.

Standard 3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Conjectural features or other elements that would create a false sense of historical development are not proposed under this alternative. No new construction would occur outside of the footprint of the proposed new housing. No greenhouse infrastructure from other nurseries would be relocated to this property. Although the design has not been finalized, the new housing would appear contemporary and distinct from the historic nursery (as described below under Standard 9), such that it would be clear that it was not constructed by or associated with the Garibaldi family's development and use of the site.

The Partial Preservation Alternative as proposed would be in conformance with this Standard.

Standard 4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

The broad period of significance (1921-1990) encompasses all of the extant character-defining features. No new construction or alterations (beyond the physical deterioration of select buildings and structures) have occurred since the Garibaldi family closed the nursery in the early 1990s. As such, the property does not contain changes that have acquired significance in their own right.

The Partial Preservation Alternative as proposed would be in conformance with this Standard.

Standard 5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

See the discussion under Standards 1 and 2. This alternative would retain the character-defining features (including Greenhouses #1-3 and #11-13, the boiler house, garage/storage building, water and pesticide storage and conveyance systems, and other small-scale features) located in the southern portion of the property that would be converted to public open space. These buildings, structures, and small-scale features would be rehabilitated following the Secretary of the Interior's Standards. However, the majority of the greenhouses at 770 Woolsey Street would be demolished, resulting in a significant loss of the distinctive materials, features, finishes, and construction techniques and craftsmanship that characterize the property.

The Partial Preservation Alternative as proposed would not be in conformance with this Standard.

Standard 6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

Although a condition assessment has not been completed to understand the current condition and treatment recommendations, the character-defining features to be retained would be repaired when feasible. Features that are severely deteriorated (such as sections of the wood framing of Greenhouse #1) would be replaced using the same design, color, texture, and material of the original.

The Partial Preservation Alternative as proposed would be in conformance with this Standard.

Standard 7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Although cleaning treatments, both chemical and physical, have not been determined, they would follow the Secretary of the Interior's Standards and would be undertaken using the gentlest means possible.

The Partial Preservation Alternative as proposed would be in conformance with this Standard.

Standard 8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

The San Francisco Planning Department's procedures for the treatment of archaeological resources would be implemented should these resources be encountered during construction of the Partial Preservation Alternative.

The Partial Preservation Alternative as proposed would be in conformance with this Standard.

Standard 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

Although the design has not been finalized, the new housing would complement the greenhouses by echoing the asymmetrical gable roofs while featuring a contemporary design. This would achieve a compatible design that does not explicitly replicate original building fabric. However, as described above under Standards 1 and 2, the Partial Preservation Alternative would result in the destruction of the historic materials, features, and spatial relationships of the majority of the greenhouses. These structures are the most visually distinctive within the property and were integral to the commercial operation and success of the nursery. The overall massing and scale of the property and the majority of the architectural features of the greenhouses would not be preserved.

The Partial Preservation Alternative as proposed would not be in conformance with this Standard.

Standard 10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Response: The new housing would be detached from the contributing buildings, structures, and small-scale features, and the removal of the duplex units would not impact the remaining character-defining features of the property. However, this alternative would result in the irreversible loss of the majority of the greenhouses, which are among the most important character-defining features of the site. Thus, the essential form and integrity of 770 Woolsey Street would be significantly impaired.

The Partial Preservation Alternative as proposed would not be in conformance with this Standard.

Impact Analysis under CEQA

The Partial Preservation Alternative does not appear to be in conformance with the Secretary of the Interior's Standards for Rehabilitation and would result in a greater visual and physical impact on the character-defining features of 770 Woolsey Street than the Full Preservation Alternative. Thus, the Partial Preservation Alternative would materially impair the historical resource and would not result in a project with a less than significant impact under CEQA.

This alternative would meet the following project objectives:

Project Objective	Completely	Partially	Not at All
Develop a mixed-income residential development consistent with and maximize housing density pursuant to the Planning Code within project site constraints and incorporating on-site affordable units.		X	
Replace an abandoned commercial cut-flower lot with residential uses and design consistent with the surrounding Portola neighborhood without displacement.		X	
Contribute to the city's goal as designated in the General Plan of maximizing housing potential in keeping with the character of the Portola District neighborhood.		X	
Provide public open space and replicate some site conditions to preserve elements of the historical uses.	X		
Provide adequate light and air to all housing units in the new development.	X		
Develop a project that is financially feasible and able to support the equity and debt returns as required by investors and lenders without public subsidy.			X

6. PRESERVATION ALTERNATIVES CONSIDERED BUT REJECTED

Several preservation alternatives were considered but ultimately discarded, as described below. Graphics illustrating these alternatives are appended.

- The San Francisco Planning Department, project sponsor L37 Partners, project architects IwamotoScott Architecture, and ARG considered concentrating the new residential units at the northwest corner of the parcel (identified as "Full Preservation Alternative – Considered but Rejected" in the graphics package). The new housing would be located in a seven-story residential building over a partially subterranean basement. It would require the demolition of Greenhouses #12, #13, #14 and #18 and remnants of Greenhouses #15-17, because they would be located within the footprint of the proposed residential building. The remaining greenhouses and other contributing buildings, structures, small-scale features, rose plants, and the central pathway would be retained. Although this alternative would result in a similar unit count as the proposed project, it was rejected, because the tall building is out-of-scale with the historic greenhouses. The height and bulky massing is not visually compatible with the historic property.

- The San Francisco Planning Department, project sponsor L37 Partners, project architects IwamotoScott Architecture, and ARG considered constructing three-story buildings containing 40 duplex units (identified as “Partial Preservation Alternative – Considered by Rejected 1” in the graphics package). The new buildings would face Bowdoin and Wayland streets north of Greenhouse #11 and face Hamilton Street between Greenhouses #3 and #9. Six greenhouses (Greenhouses #1-3, #9-11) and the other contributing buildings, structures, small-scale features, rose plants, and the central pathway would be retained. This alternative was rejected, because it physically and visually separates Greenhouses #9-10 at the northeast corner from the cluster of greenhouses and ancillary buildings at the south end of the site. This could make the greenhouses prone to demolition in the future.
- The San Francisco Planning Department, project sponsor L37 Partners, project architects IwamotoScott Architecture, and ARG considered constructing 40 duplex units along the northern and western sides of the property (identified as “Partial Preservation Alternative – Considered by Rejected 2” in the graphics package). Greenhouses #1-6 and #11, along with the other contributing buildings, structures, small-scale features, rose plants, and the central pathway would be retained. The retention of Greenhouses #1-6 facing Hamilton Street would convey the scale, density, and rhythm of these structures. This alternative was rejected, because it does not create a cohesive group of greenhouses that would more easily be maintained as a community garden in the southern portion of the site.

7. CONCLUSION

Originally founded in 1921 as the University Mound Nursery and continually operated as a cut-flower nursery by the Garibaldi family until it closed in the early 1990s, the property at 770 Woolsey Street is a significant cultural landscape comprising an early twentieth century nursery established by Italian immigrants in the Portola neighborhood. As such, it qualifies for listing in the California Register under Criteria 1 and 3 and retains a high level of integrity.

The proposed project at 770 Woolsey Street would remove most of the property’s historic material and eliminate a significant number of historic features and spaces that characterize the historical resource. As such, it would not comply with the Secretary of the Interior’s Standards for Rehabilitation and constitutes a significant impact to this historical resource.

Two alternatives have been developed to the proposed project: a Full Preservation Alternative and a Partial Preservation Alternative. This analysis finds that the Full Preservation Alternative would maintain the majority of the character-defining features of the historic nursery and therefore, would result in a less-than-significant impact on the historical resource at 770 Woolsey Street. The Partial Preservation Alternative would maintain the character-defining features of the existing historical resource in the southern section of the site, which would be converted to public open space. However, the proposed new construction in the northern section of the site would result in the demolition of the majority of the historic greenhouses. In contrast to the Proposed Project, the Partial Preservation Alternative would reduce impacts to the historical resource and meet several of the project objectives; however, it would not result in a project with a less than significant impact.

8. BIBLIOGRAPHY

Architectural Resources Group. "770 Woolsey Street, San Francisco, California, Historic Resource Evaluation." Prepared for 140 Partners LP. March 2019.

California Environmental Quality Act (CEQA) Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Article 5, Preliminary Review of Projects and Conduct of Initial Study (Sections 15060-15065). Accessed August 28, 2020, <https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-5-preliminary-review-of-projects-and-conduct-of-initial-study>.

National Park Service, Technical Preservation Services. "Standards for Rehabilitation," *The Secretary of the Interior's Standards*. Accessed January 31, 2020. <https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm>.

San Francisco Historic Preservation Commission. "Resolution No. 0746, Adoption of a Policy Statement to Clarify Historic Preservation Commission Expectations for the Development and Evaluation of Preservation Alternatives in Environmental Impact Reports for the Purposes of the California Environmental Quality Act." Adopted on March 18, 2015.

San Francisco Planning Department. "Historic Resource Evaluation Response, Part 1: Historic Resource Evaluation, 770 Woolsey Street, Record No. 2017-012086ENV." May 4, 2020.

_____. "Historic Resource Evaluation Response, Part II: Project Evaluation, 770 Woolsey Street, Record No. 2017-012086ENV." November 9, 2020.

770 Woolsey Street, San Francisco, California
Preservation Alternatives Analysis

Appendix
Preservation Alternatives Graphics Package



Architectural
Resources Group

770 WOOLSEY

Site Plan Alternative

October 22, 2020

PROJECT DESCRIPTION

EXISTING SITE CONDITION

FULL PRESERVATION ALTERNATIVE

PARTIAL PRESERVATION ALTERNATIVE

GFA SUMMARY

FULL PRESERVATION ALTERNATIVE - CONSIDERED BUT REJECTED

PARTIAL PRESERVATION ALTERNATIVE - CONSIDERED BUT REJECTED 1

PARTIAL PRESERVATION ALTERNATIVE - CONSIDERED BUT REJECTED 2

GFA SUMMARY

Project Description

Email (5/21/2020) from Justin Greving (Senior Preservation Planner @ SF Planning)
Enumerated by IwamotoScott for Coordination

cdfs from the HRER Part 1 for reference and they are as follows:

- 1. Site
 - 1a. Boundary encompassing the entire 240-foot-wide by 400-foot-long block and enclosed mostly by wood fencing
 - 1b. Topography that slopes gently from the northwest to southeast corner
 - 1c. Spatial organization of greenhouses oriented along a central north-south axis and filling the majority of the site, ancillary buildings clustered at the southern end, and small open spaces at the northwest corner and the southern end
 - 1d. Axial circulation through the site via a 9-foot wide pathway extending north-south through the center of the site
 - 1e. Surviving rose plants within the greenhouses
- 2. Greenhouses
- 3. Boiler House
- 4. Garage/Storage Building
- 5. Mixing Shed
- 6. Infrastructure (All extant water and small-scale features (secondary), including two hand-dug wells; water storage tank; water pressure tank; pesticide mixing tank; the system of piping, both above and below ground, to convey water, steam, and pesticides to the greenhouses; and the water drainage channel extending along the central pathway and terminating at the garage/storage building)

Under the Full Preservation Alternative we would want to see the following cdfs retained:

- 1. Site
 - 1a. Boundary encompassing the entire 240-foot-wide by 400-foot-long block and enclosed mostly by wood fencing (the boundary will be retained, possibly keep some of fencing in areas where the greenhouses are to be kept)
 - 1b. Topography that slopes gently from the northwest to southeast corner (this will likely remain)
 - 1c. Spatial organization of greenhouses oriented along a central north-south axis and filling the majority of the site, ancillary buildings clustered at the southern end, and small open spaces at the northwest corner and the southern end (this will generally be retained in some sense in areas where the greenhouses are to be kept. But we understand the NW corner will not be retained)
 - 1d. Axial circulation through the site via a 9-foot wide pathway extending north-south through the center of the site (this should be kept)
 - 1e. Surviving rose plants within the greenhouses (these should be incorporated somehow but they can be moved)
- 2. Greenhouses (retain Greenhouses 2-10, probably also 1 and 11. Retention of 11 would allow for understanding the the greenhouses were stacked two deep on the site. Keep open space south of greenhouses 1 and 11 open). As Erica notes the team should be aware that #1 and #2 are in poor condition; #1 has largely collapsed but enough remains that it could be reconstructed. Another option is to salvage, rehabilitate, and shift some of the greenhouses south.
- 3. Boiler House (retain)
- 4. Garage/Storage Building (retain)
- 5. Mixing Shed (retain)
- 6. Infrastructure (of the infrastructure listed it would be important to retain the two hand-dug wells; water storage tank; water pressure tank; pesticide mixing tank. I don't think the existing piping needs to be retained in its entirety under this alternative, maybe some small pieces to demonstrate their function as it relates to the greenhouses that would remain under this alternative. And piping would be documented as part of mitigation).

Under the Partial Preservation Alternative we would want to see the following cdfs retained:

- 1. Site
 - 1a. Boundary encompassing the entire 240-foot-wide by 400-foot-long block and enclosed mostly by wood fencing (the boundary will be retained, but the fencing doesn't necessarily need to be retained)
 - 1b. Topography that slopes gently from the northwest to southeast corner (this will likely remain)
 - 1c. Spatial organization of greenhouses oriented along a central north-south axis and filling the majority of the site, ancillary buildings clustered at the southern end, and small open spaces at the northwest corner and the southern end (this will be partially retained but will not give the idea that the greenhouses filled the majority of the site as the NW corner of the site will be developed).
 - 1d. Axial circulation through the site via a 9-foot wide pathway extending north-south through the center of the site (this should be kept)
 - 1e. Surviving rose plants within the greenhouses (these should be incorporated somehow but they can be moved)
- 2. Greenhouses (Retain a few of the greenhouses numbered 1-10, variations to explore include retaining 1-3 and 9-10, or 1-6. These are not exact numbers but the general goal is to see what it would look like to retain a number of greenhouses in a way that would still allow for them to look like they once encompassed the entire site)
- 3. Boiler House (retain)
- 4. Garage/Storage Building (allow for this to be demolished)
- 5. Mixing Shed (allow this to be demolished as it is attached to the Garage)
- 6. Infrastructure (of the infrastructure listed it would be important to retain one of the two hand-dug wells (likely #2 on the SE corner); and possibly not all of the tanks on the site (water storage tank; water pressure tank; pesticide mixing tank). I don't think the existing piping needs to be retained in its entirety under this alternative, maybe some small pieces to demonstrate their function as it relates to the greenhouses that would remain under this alternative)

PROJECT DESCRIPTION

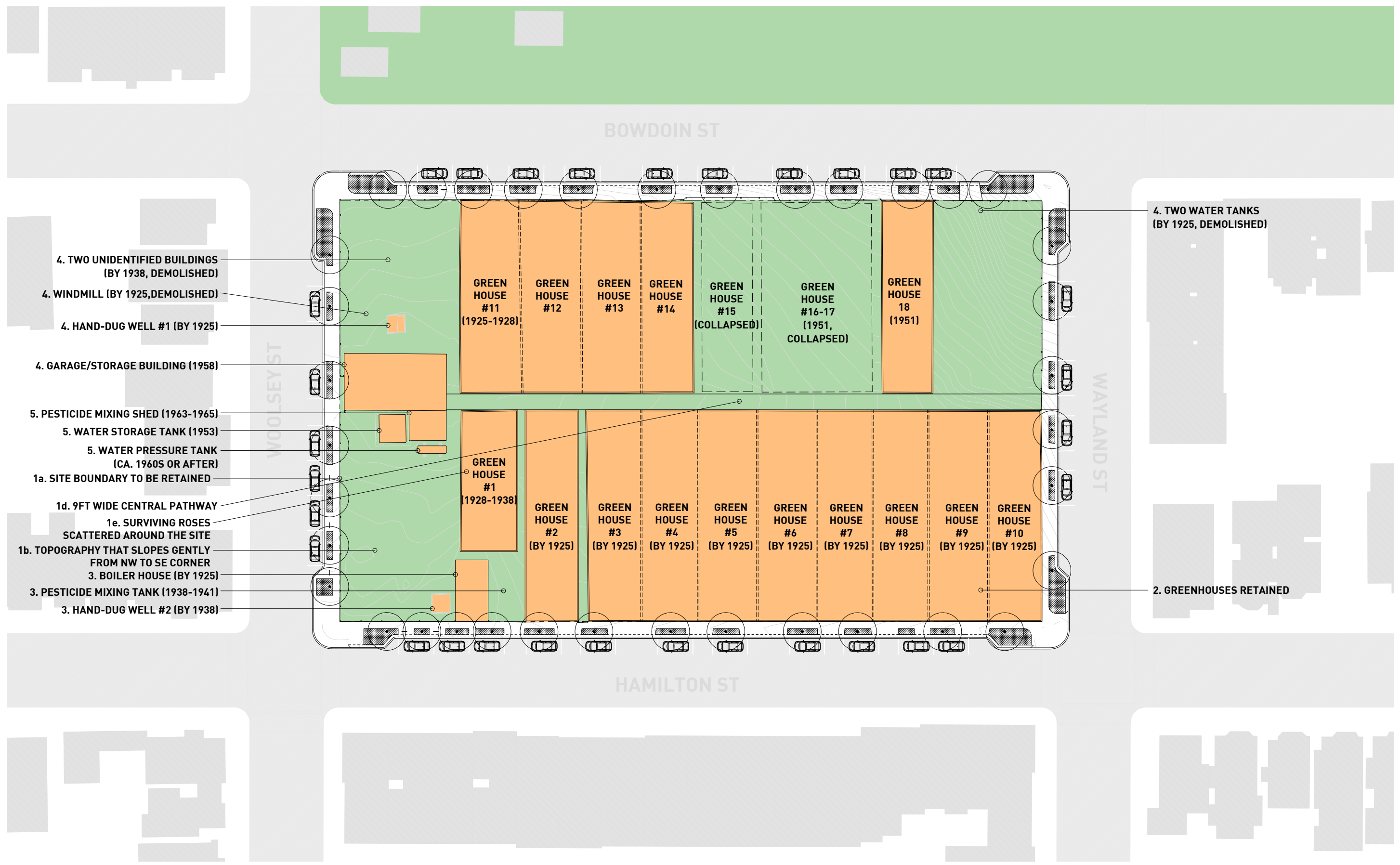


Figure 1: Aerial view of 770 Woolsey showing key structures and buildings on site (image courtesy of HRE Part 1, p. 5)



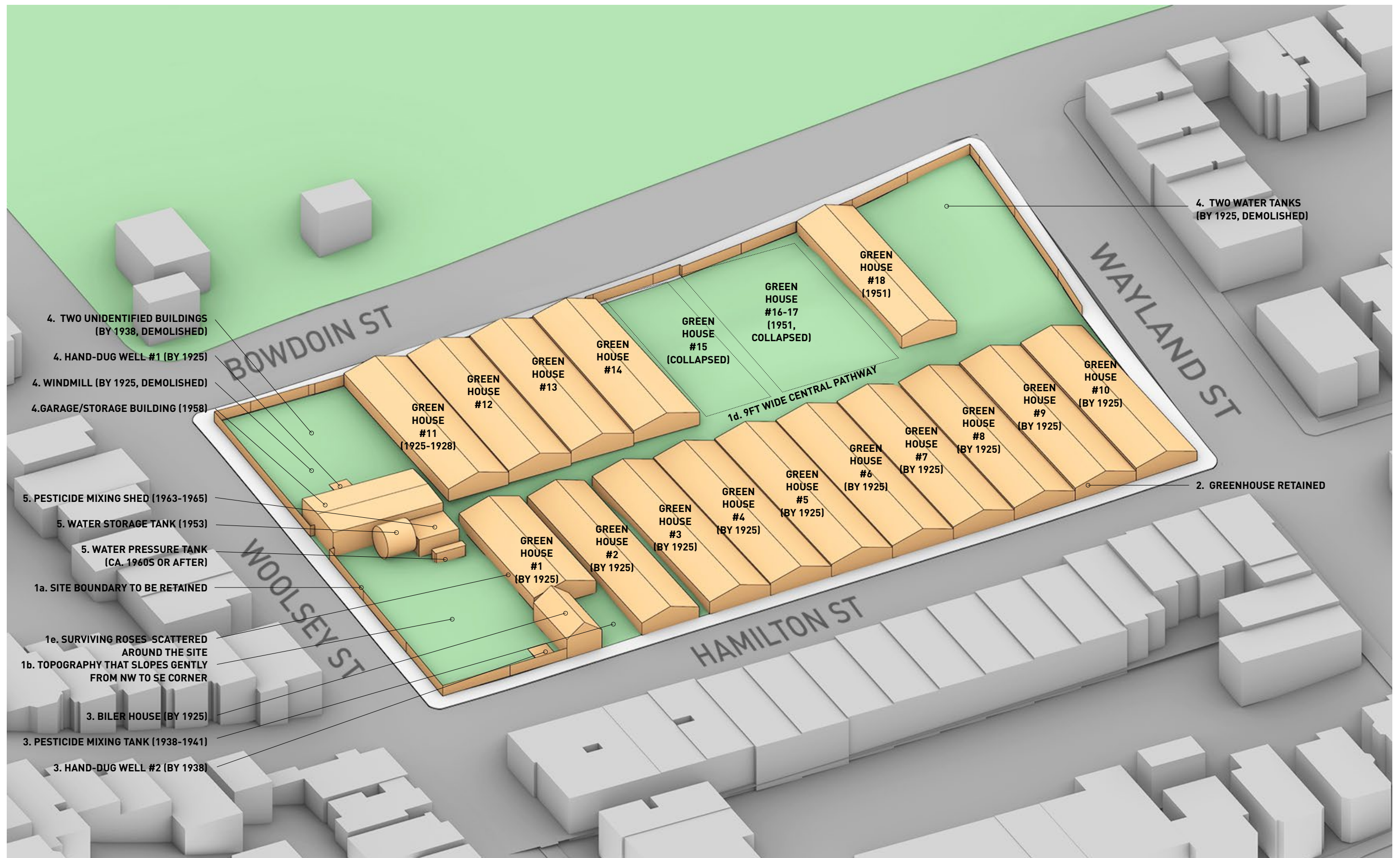
Figure 2: View west of the northwest corner of Woolsey and Hamilton streets. (image courtesy of google maps)

PROJECT DESCRIPTION

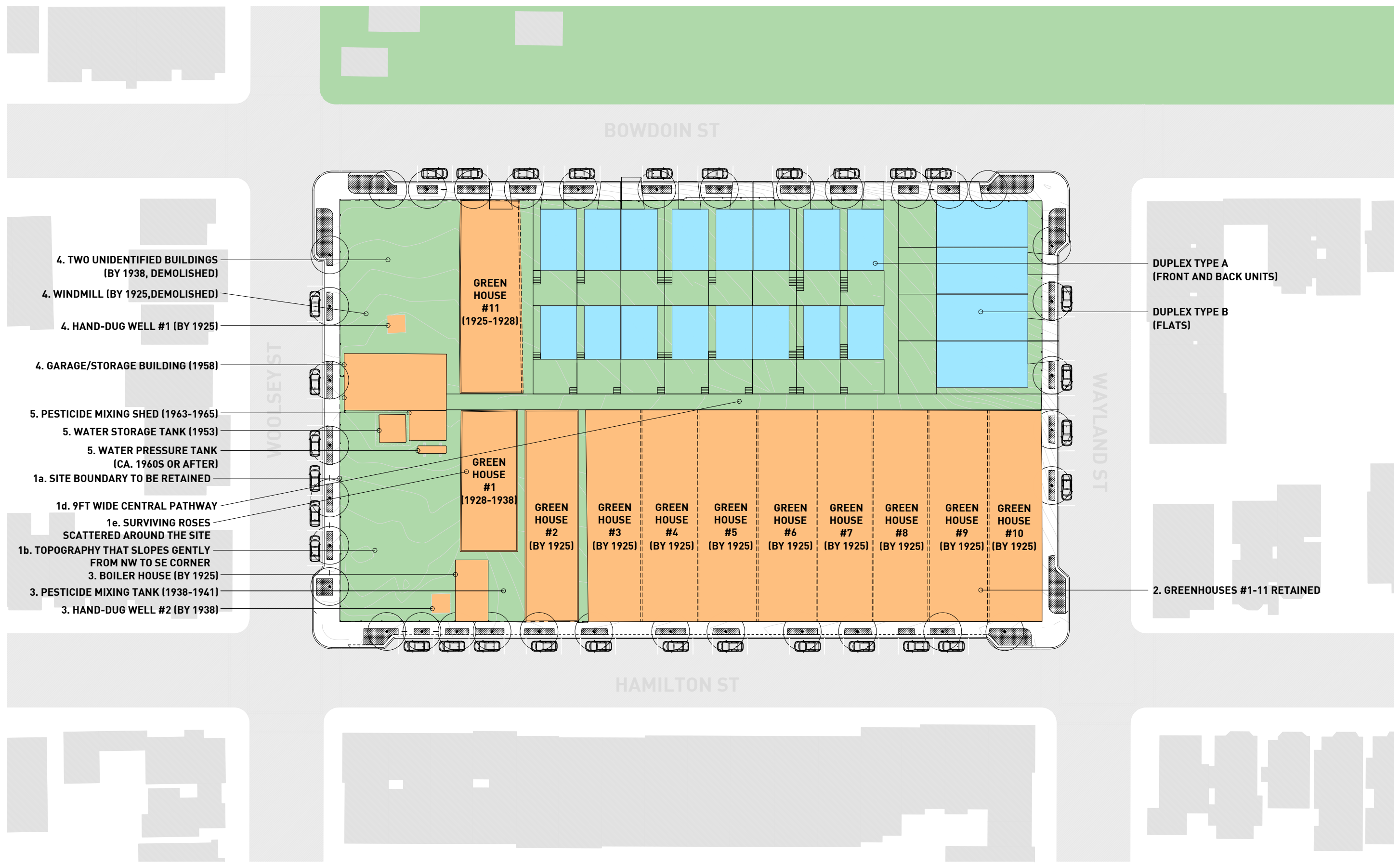


0 20FT 60FT 120FT

EXISTING SITE CONDITION

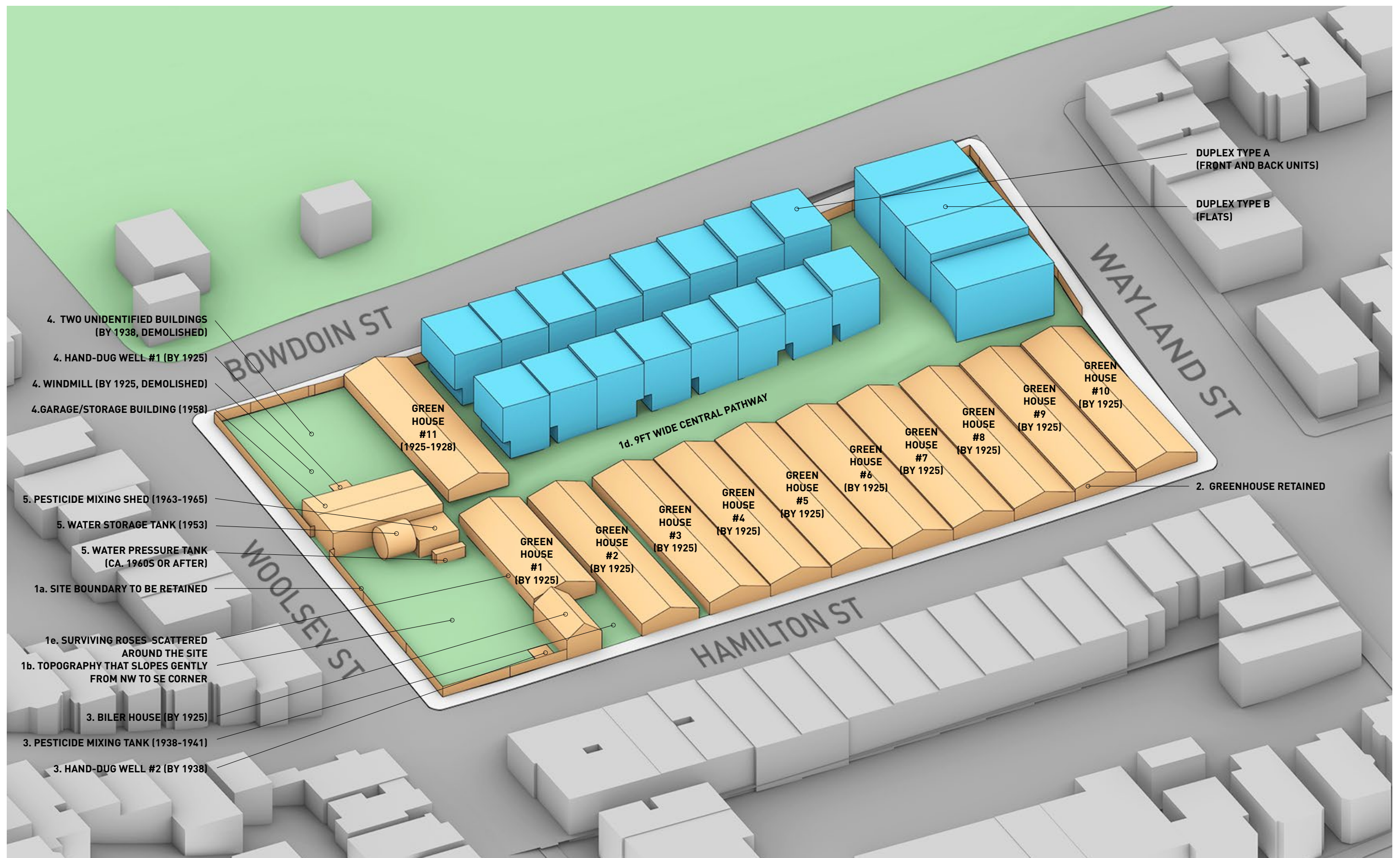


EXISTING SITE CONDITION



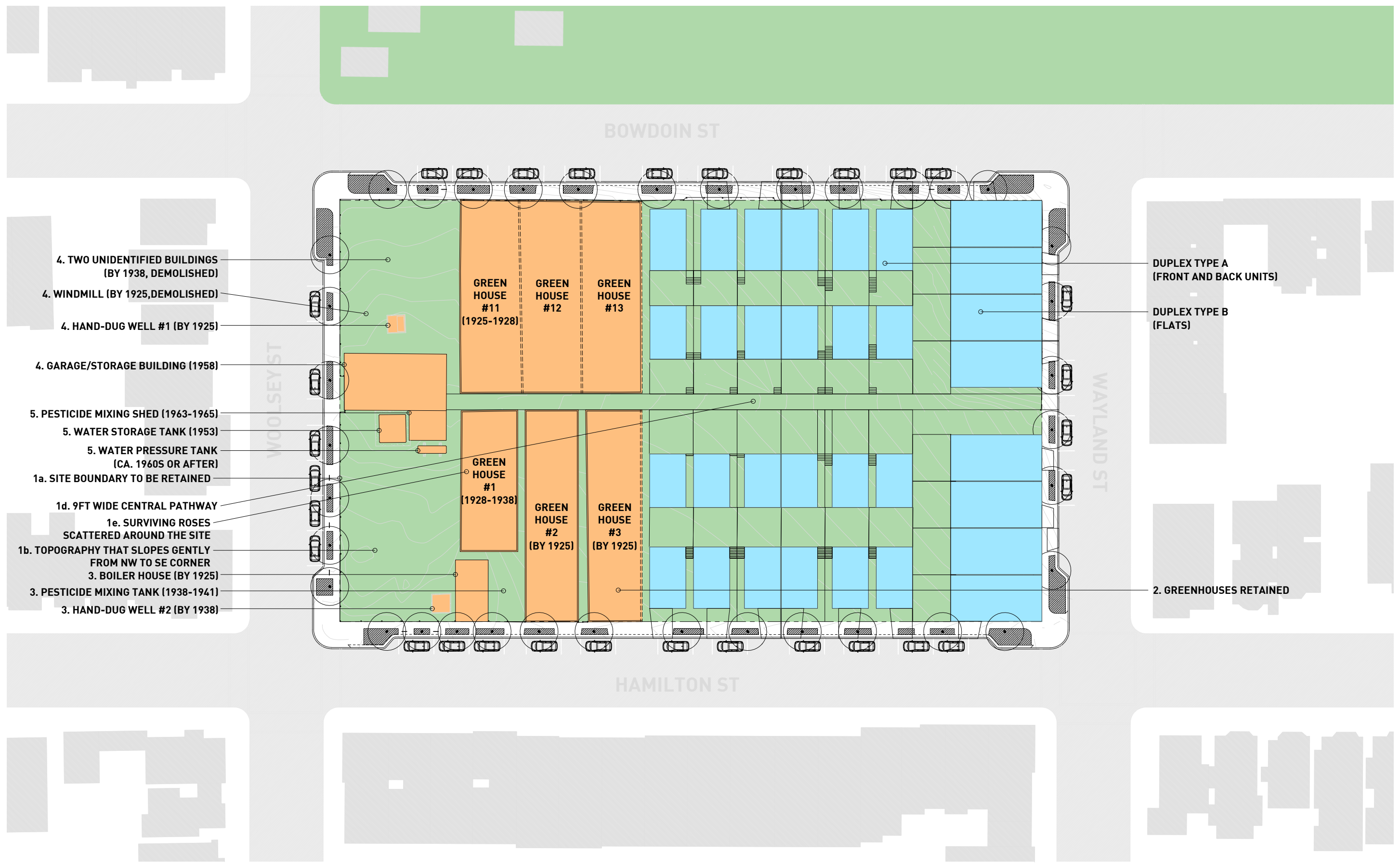
0 20FT 60FT 120FT

FULL PRESERVATION ALTERNATIVE
24 Residential Units



FULL PRESERVATION ALTERNATIVE

24 Residential Units



- 4. TWO UNIDENTIFIED BUILDINGS (BY 1938, DEMOLISHED)
- 4. WINDMILL (BY 1925, DEMOLISHED)
- 4. HAND-DUG WELL #1 (BY 1925)
- 4. GARAGE/STORAGE BUILDING (1958)
- 5. PESTICIDE MIXING SHED (1963-1965)
- 5. WATER STORAGE TANK (1953)
- 5. WATER PRESSURE TANK (CA. 1960S OR AFTER)
- 1a. SITE BOUNDARY TO BE RETAINED
- 1d. 9FT WIDE CENTRAL PATHWAY
- 1e. SURVIVING ROSES SCATTERED AROUND THE SITE
- 1b. TOPOGRAPHY THAT SLOPES GENTLY FROM NW TO SE CORNER
- 3. BOILER HOUSE (BY 1925)
- 3. PESTICIDE MIXING TANK (1938-1941)
- 3. HAND-DUG WELL #2 (BY 1938)

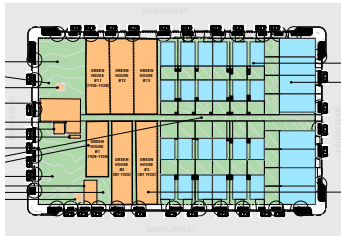
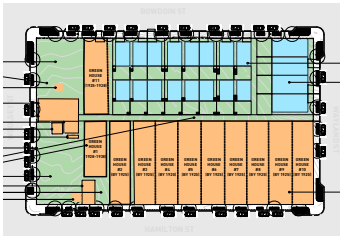
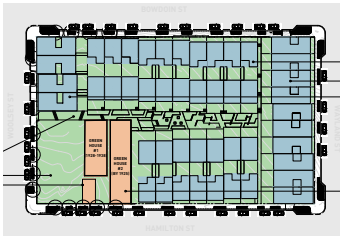
- DUPLEX TYPE A (FRONT AND BACK UNITS)
- DUPLEX TYPE B (FLATS)
- 2. GREENHOUSES RETAINED

PARTIAL PRESERVATION ALTERNATIVE
40 Residential Units



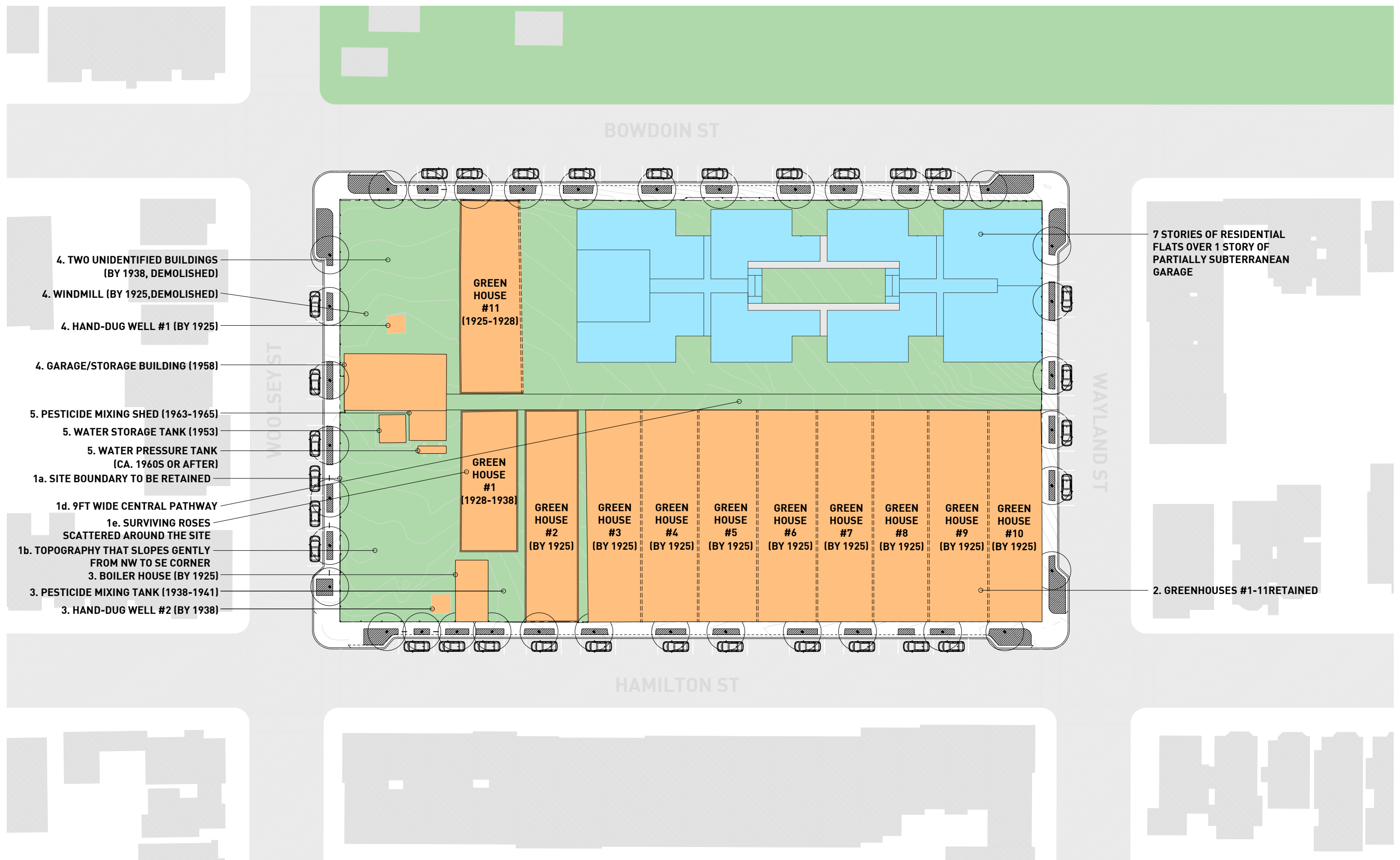
PARTIAL PRESERVATION ALTERNATIVE

40 Residential Units



	SF PLANNING RESUBMISSION REV 2	FULL PRESERVATION ALTERNATIVE	PARTIAL PRESERVATION ALTERNATIVE
RESIDENTIAL UNIT#	62	24	40
GROSS FLOOR AREA (SF)	120,967	46,677	77,795

GFA SUMMARY



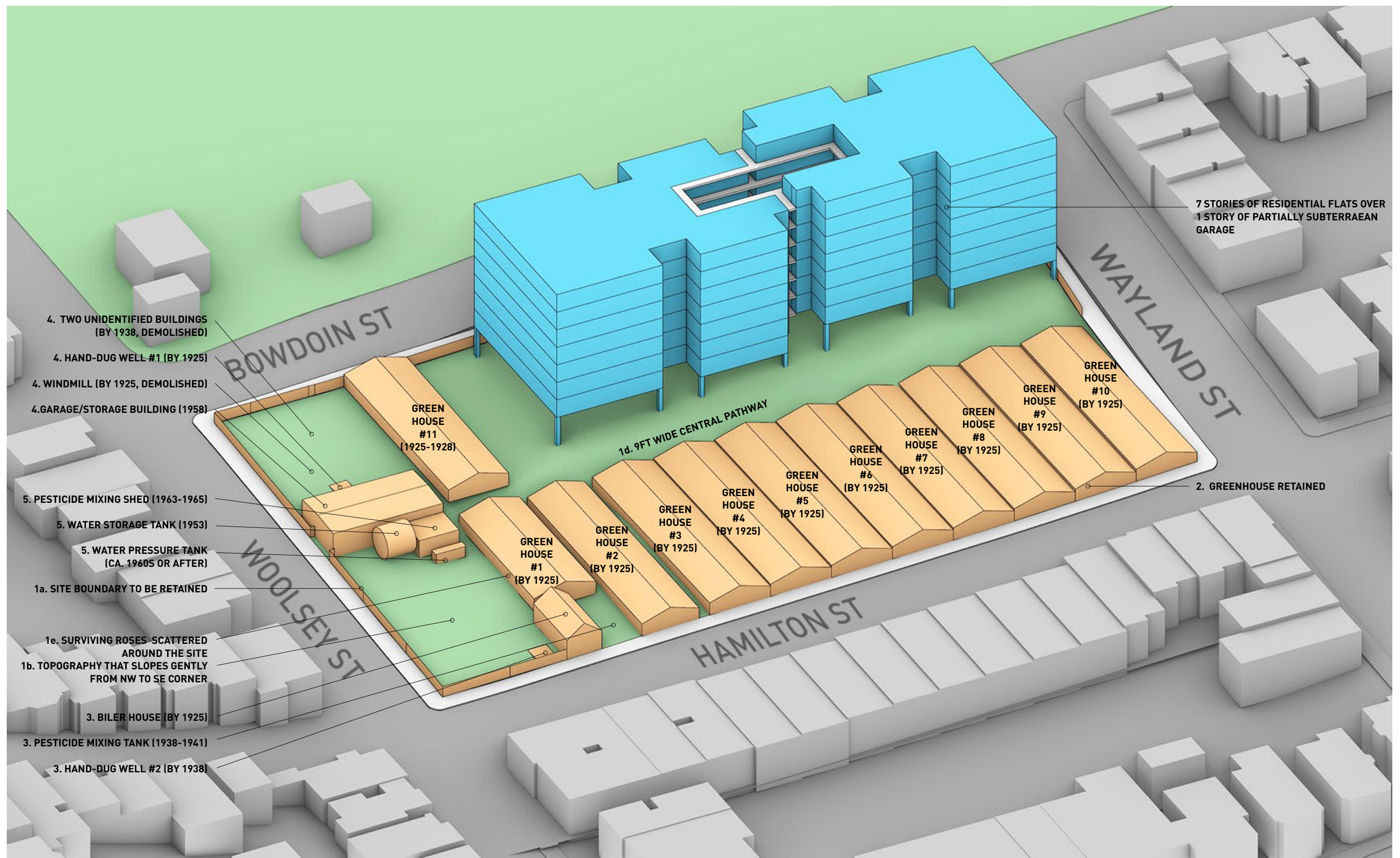
- 4. TWO UNIDENTIFIED BUILDINGS (BY 1938, DEMOLISHED)
- 4. WINDMILL (BY 1925, DEMOLISHED)
- 4. HAND-DUG WELL #1 (BY 1925)
- 4. GARAGE/STORAGE BUILDING (1958)
- 5. PESTICIDE MIXING SHED (1963-1965)
- 5. WATER STORAGE TANK (1953)
- 5. WATER PRESSURE TANK (CA. 1960S OR AFTER)
- 1a. SITE BOUNDARY TO BE RETAINED
- 1d. 9FT WIDE CENTRAL PATHWAY
- 1e. SURVIVING ROSES SCATTERED AROUND THE SITE
- 1b. TOPOGRAPHY THAT SLOPES GENTLY FROM NW TO SE CORNER
- 3. BOILER HOUSE (BY 1925)
- 3. PESTICIDE MIXING TANK (1938-1941)
- 3. HAND-DUG WELL #2 (BY 1938)

7 STORIES OF RESIDENTIAL FLATS OVER 1 STORY OF PARTIALLY SUBTERRANEAN GARAGE

2. GREENHOUSES #1-11 RETAINED

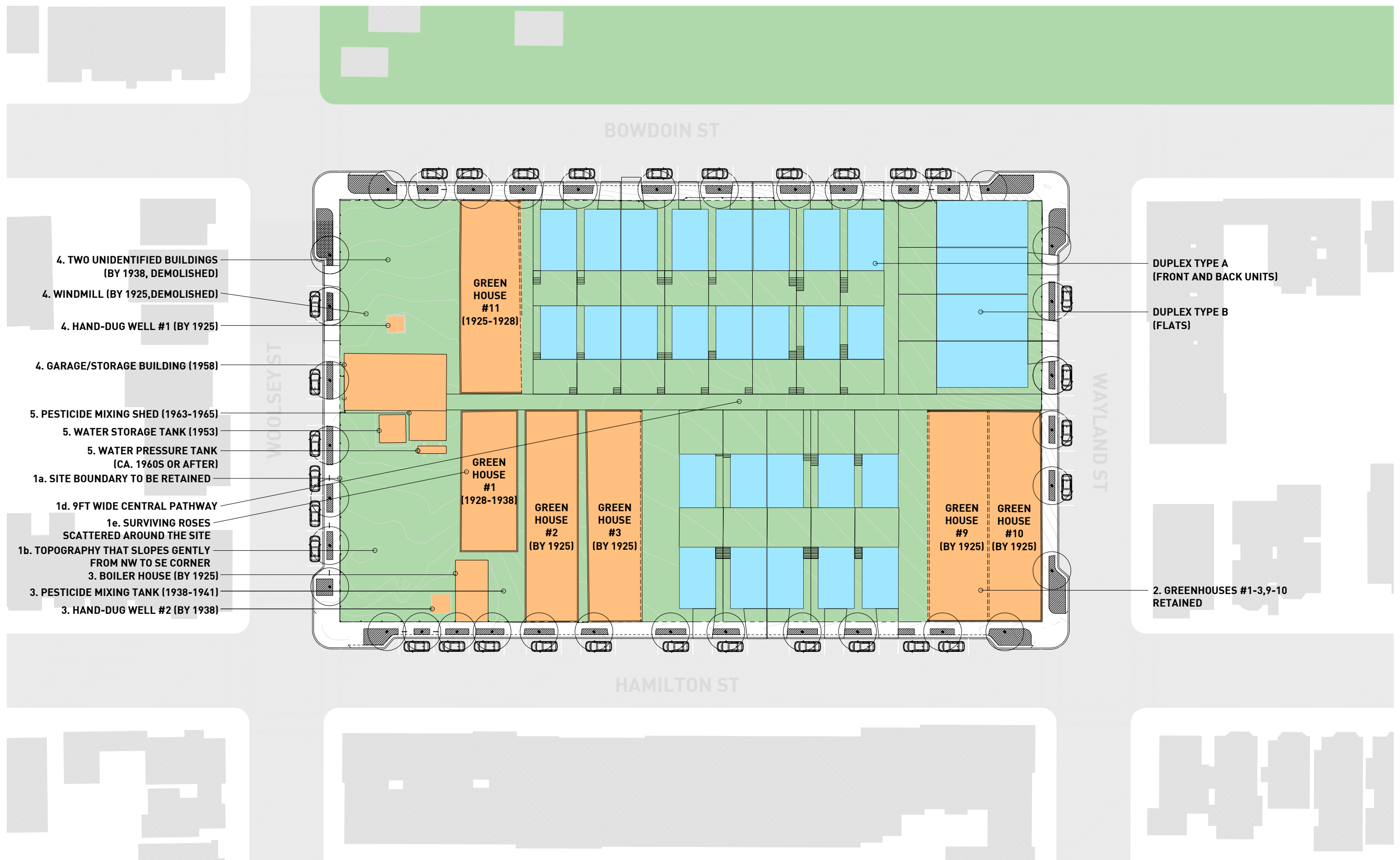
FULL PRESERVATION ALTERNATIVE - CONSIDERED BUT REJECTED

63 Residential Units

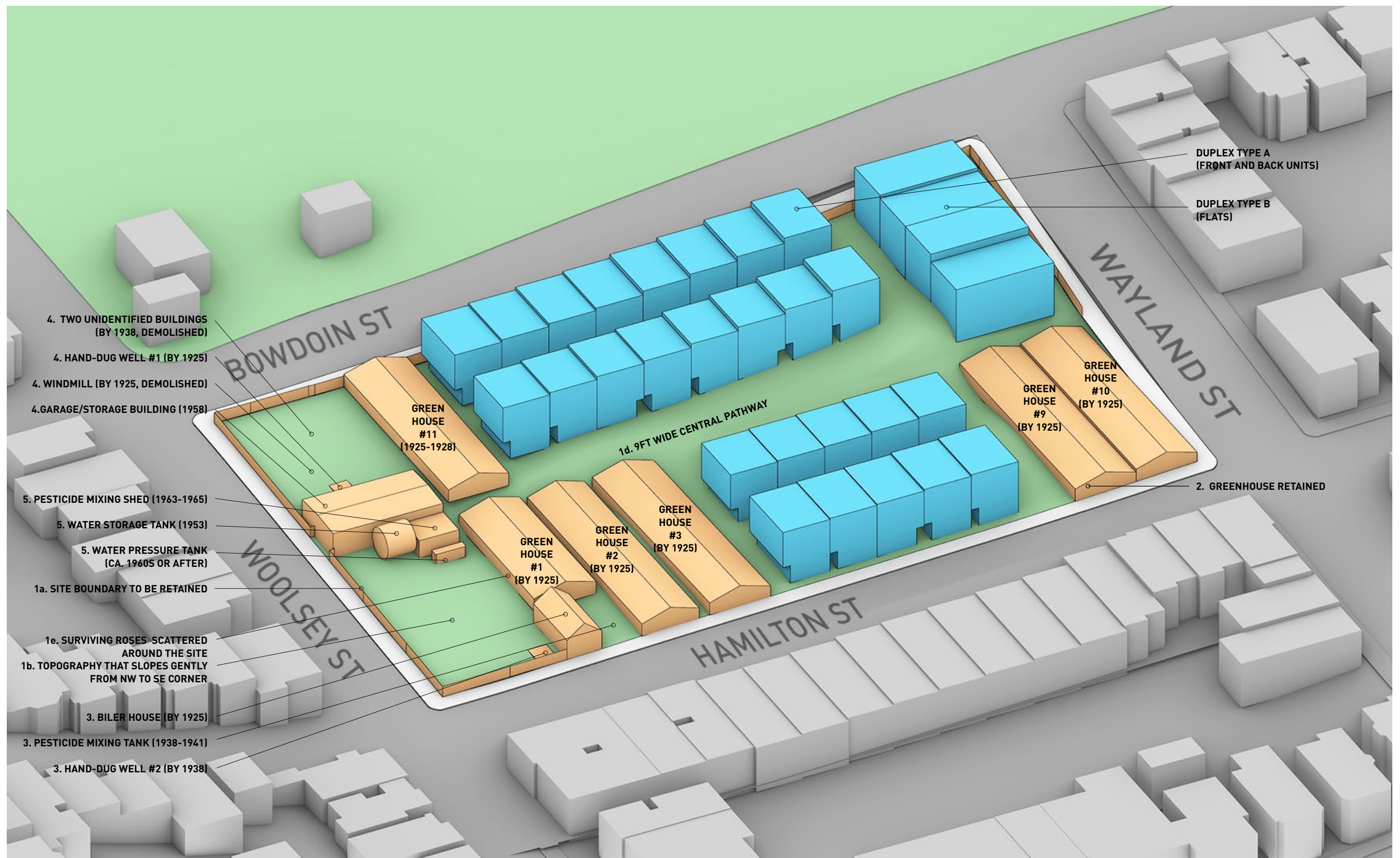


FULL PRESERVATION ALTERNATIVE - CONSIDERED BUT REJECTED

63 Residential Units

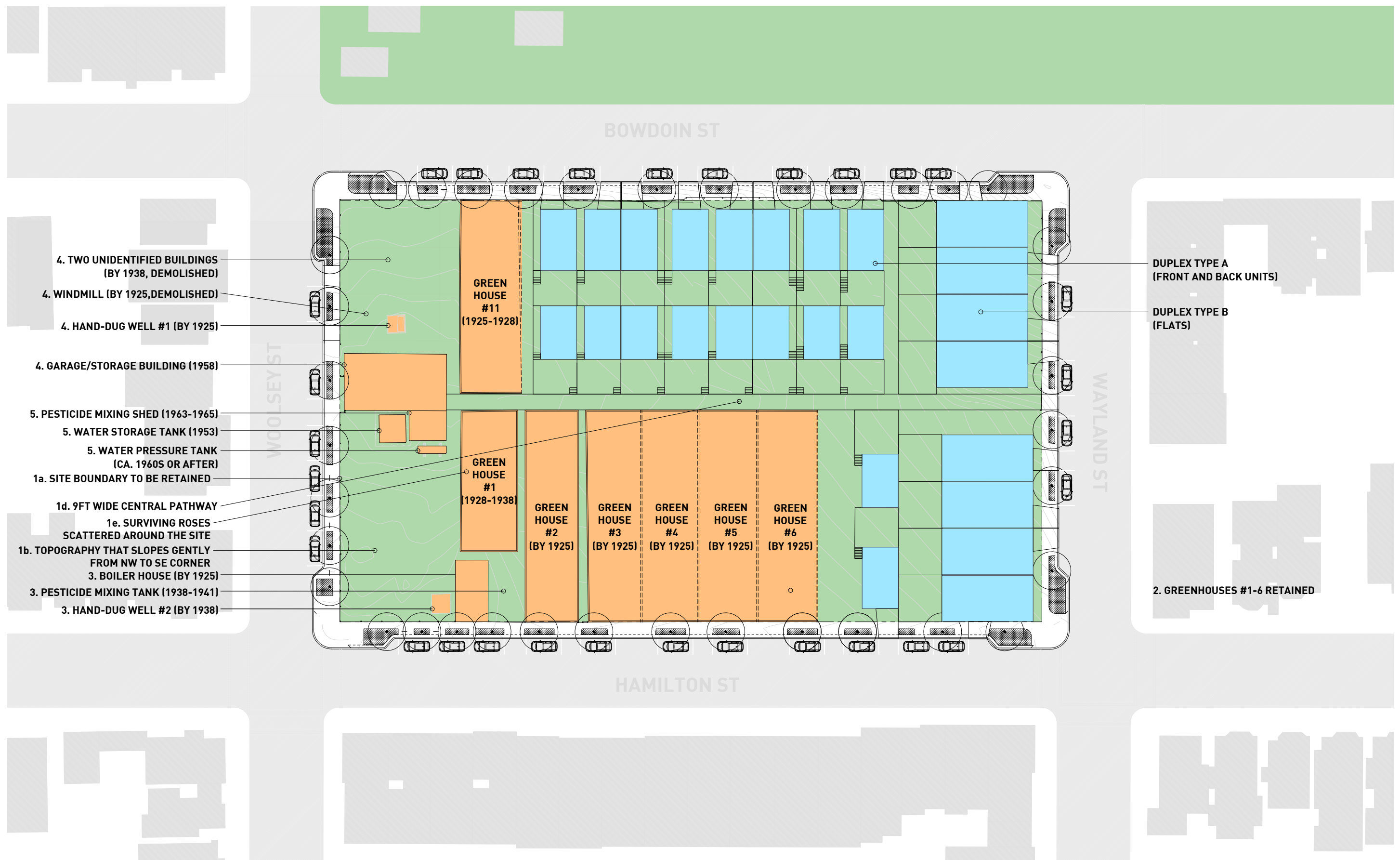


PARTIAL PRESERVATION ALTERNATIVE - CONSIDERED BUT REJECTED 1
40 Residential Units



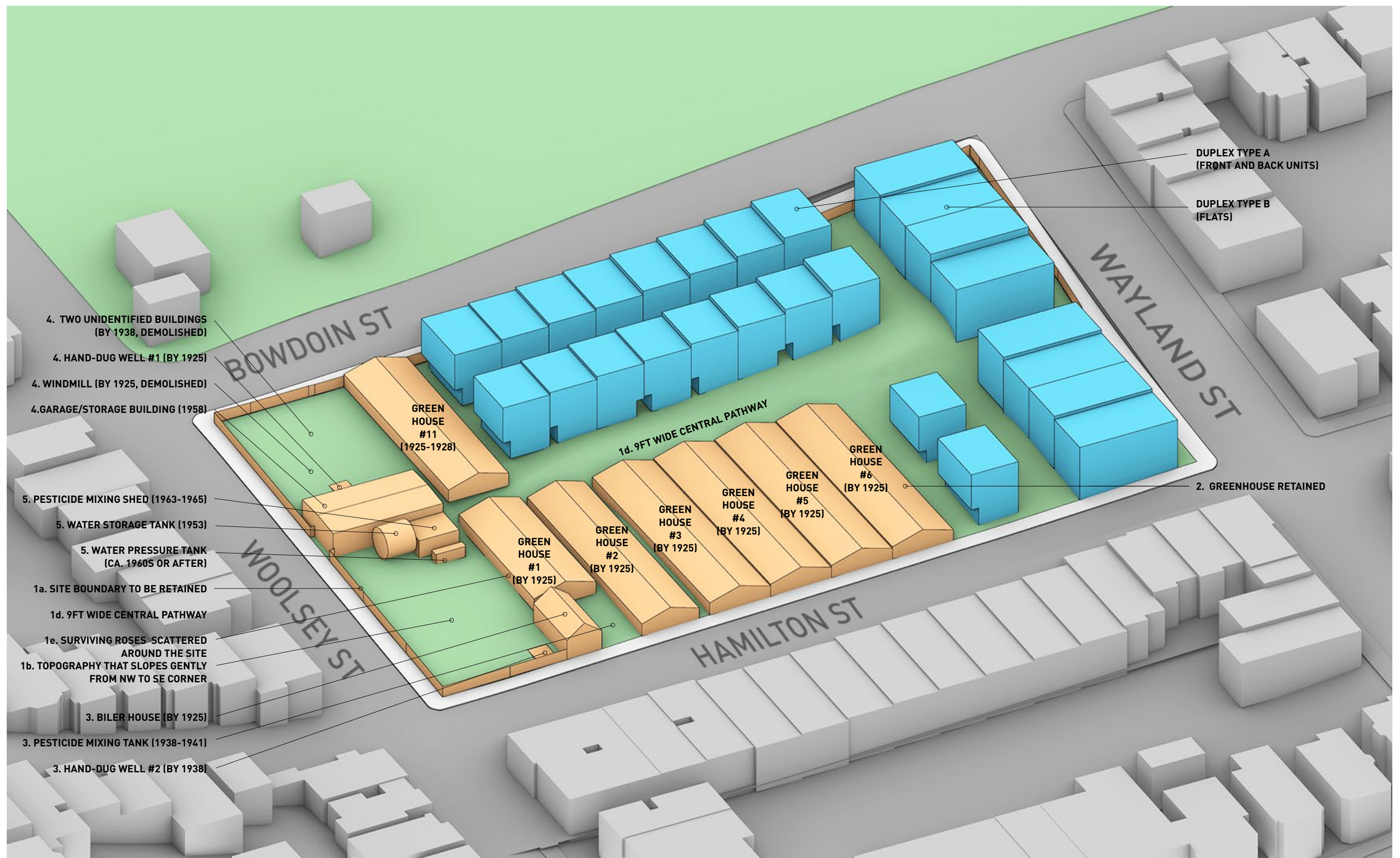
PARTIAL PRESERVATION ALTERNATIVE - CONSIDERED BUT REJECTED 1

40 Residential Units

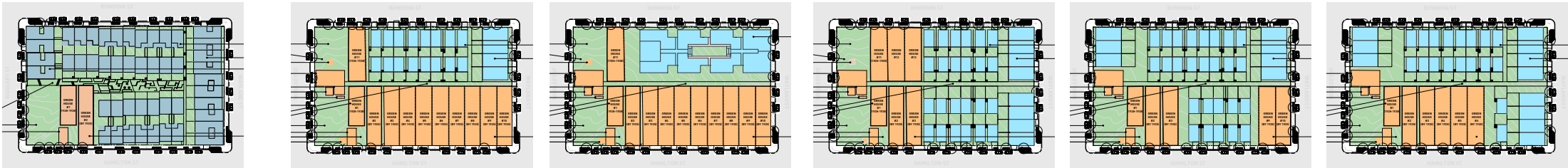


0 20FT 60FT 120FT

PARTIAL PRESERVATION ALTERNATIVE - CONSIDERED BUT REJECTED 2 40 Residential Units



PARTIAL PRESERVATION ALTERNATIVE - CONSIDERED BUT REJECTED 2 40 Residential Units



	SF PLANNING RESUBMISSION REV 2	FULL PRESERVATION ALTERNATIVE	FULL PRESERVATION ALT. - CONSIDERED BUT REJECTED	PARTIAL PRESERVATION ALTERNATIVE	PARTIAL PRESERVATION ALT. - CONSIDERED BUT REJECTED 1	PARTIAL PRESERVATION ALT. - CONSIDERED BUT REJECTED 2
RESIDENTIAL UNIT#	62	24	63	40	40	40
GROSS FLOOR AREA (SF)	120,967	46,677	129,366	77,795	77,795	77,795

GFA SUMMARY

SAN FRANCISCO

Pier 9, The Embarcadero, Suite 107
San Francisco, California 94111

T: 415.421.1680

F: 415.421.0127

argsf.com

LOS ANGELES

360 E. 2nd Street, Suite 225
Los Angeles, CA 90012

T: 626.583.1401

F: 626.583.1414

arg-la.com

PORTLAND

720 SW Washington Street, Suite 300
Portland, OR 97205

T: 971.256.5324

arg-pnw.com