

CITY COLLEGE OF SAN FRANCISCO FIRE STATION RELOCATION PROJECT Categorical Exemption

Prepared for:

San Francisco Community College District
50 Frida Kahlo Way
San Francisco, California 94112

Prepared by:

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October 2020

Notice of Exemption

To: Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento

From: (Public Agency)
San Francisco Community College District
50 Frida Kahlo Way
San Francisco, CA 94112

County Clerk:
City and County of San Francisco
City Hall, Room 168
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4678

Project Title: City College of San Francisco Fire Station Relocation Project

Project Location - Specific: City College of San Francisco – John Adams Center, 1860 Hayes Street

Project Location - City: San Francisco **County:** San Francisco

Description of Nature, Purpose, and beneficiaries of Project:

The proposed project would relocate the Fire Academy of the City College of San Francisco from the Airport Center to the John Adams Center. The John Adams Center would then be used by the Emergency Medical Technician program and Fire Academy. The proposed project would include the construction of a prefabricated three-story new training tower and an apparatus storage shed. The tower would be used for training firefighters and emergency responders. Construction of the training tower would require the demolition of an existing playground and associated sand area. It would also require an extension to the water utility line.

Name of Public Agency Approving Project:

San Francisco Community College District (District)

Name of Person or Agency Carrying Out Project:

City College of San Francisco

Exempt Status: (check one)

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));

X Categorical Exemption. State type and section number: Class 3, New Construction or Conversion of Small Structures; Section 15303

☐ Statutory Exemptions. State code number:

Reasons why project is exempt: The project involves the construction of a limited number of new, small accessory structures and utilities extension to serve the new structures that would result in no significant environmental impacts.

Lead Agency Contact Person:	Alberto Vasquez, Interim Associate Vice Chancellor City College of San Francisco	Area Code/Telephone:	(415)239-3055
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If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? ☒ Yes ☐ No

Signature: _____

Date: _____

Title: Interim Associate Vice
Chancellor

Date received for filing at OPR:

**FIRE ACADEMY RELOCATION PROJECT
CITY COLLEGE OF SAN FRANCISCO, JOHN ADAMS CENTER
JUSTIFICATION FOR CATEGORICAL EXEMPTION**

Project Description

The proposed project is located in the City College of San Francisco's (CCSF) John Adams Center (Center), located at 1860 Hayes Street (**Figure 1, Regional Location and Project Site Vicinity**) on a 104,840 square-foot parcel. The Center spans one city block and is bounded by Grove Street on the north, Masonic Avenue on the east, Hayes Street on the south, and Ashbury Street on the west. The main structure of the three-building Center is a four-story brick building, constructed in 1911–1912, sited in the southwest portion of the project site with an approximately 32,000 square-foot footprint and total area of 133,379 square feet. The building contains 64 classrooms and labs, an auditorium, a childcare center, and administrative offices. A two-story, 15,000-square-foot, gymnasium and a single-story, 3,000-square-foot, annex are located in the northeast and northwest corners of the project site, respectively. Both the gymnasium and annex were constructed in 1938. There are approximately four to five ornamental trees and a few shrubs at the project site. Land uses surrounding the center include a mix of medium-density residential and commercial uses.

The proposed Fire Academy Relocation project (proposed project) would relocate the Fire Academy currently administered at CCSF's Airport Center located at the San Francisco International Airport to the John Adams Center. The John Adams Center currently includes classroom and field exercises for Emergency Medical Technician (EMT) level 1 students. Upon project implementation, the John Adams Center would house the EMT program and the Fire Academy. The Fire Academy facilities at the Airport Center, currently leased from San Francisco International Airport, would be decommissioned and the 25 students who usually attend classes at this facility would be attending classes and training activities at the John Adams Center. Upon completion of the proposed project, the Fire Academy would cease fire training activities currently conducted at the Treasure Island Training Facility of the San Francisco Fire Department. The other two locations where the Fire Academy currently conduct training are South San Francisco Fire Department Station 61 and Cal Fire San Mateo County Fire Station 17. Training under certain modules of the Fire Academy program would continue to take place at these two locations.

The proposed project would include the installation of a new training tower and apparatus storage shed (**Figure 2, Site Plan**). The new training tower would be located west of the existing gymnasium building, in an area formerly used as a playground for the Center's childcare center. The playground equipment and associated sand area are not in use and would be removed as part of the project. The storage shed would be located further west of the proposed training tower location, in the existing parking lot. The proposed training tower would be composed of three stories and a roof and would have a footprint of approximately 866 square feet and a total area of approximately 2,238 square feet. The prefabricated storage shed would be one story and would have a footprint of approximately 800 square feet. The training tower would be a prefabricated structure and would use theatrical smoke (in lieu of live fire) to simulate fire conditions for student training exercises. The training tower area would be enclosed by a chain linked fence. The structures would be clad in concrete tinted and/or stained in a brick color approved by a professionally qualified architectural historian to ensure the buildings would adequately blend into the setting, be recognizable as modern structures, and be subordinate to the historic buildings.

The proposed project would include two fire hydrants constructed to train students on applying water and using fire hoses, one located south of the training tower and another located further south near the southern

entrance of the Center. Water for the new hydrants would be drawn via a 6-inch line that would extend underground within the center parking lot and connect to an existing water main within the sidewalk on the south side of the Center. Both structures would be installed on a concrete slab. Construction of the project is expected to begin in Winter 2020 and would last approximately three to six months. During construction, the District would require the contractor to implement best management practices (BMPs) to minimize erosion and sediment. These measures would include:

- Providing drawings showing erosion and sediment control measures during construction to prevent soil erosion and discharge of soil-bearing runoff or airborne dust to adjacent properties and walkways.
- Inspection, repair, and maintenance of erosion control measures during construction.
- Stabilizing areas disturbed during removal of erosion and sedimentation control measures.

Reasons to Support Exemption Findings

The proposed project qualifies as a Class 3 project that is exempt under *State CEQA Guidelines* Section 15303, New Construction or Conversion of Small Structures. Class 3 projects involve the construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. Examples of small structures that would qualify for exemption under Class 3 include up to four commercial buildings in urbanized areas that would not exceed 10,000 square feet and would not involve the use of significant amounts of hazardous substances. Exempted activities under Class 3 also include utility extensions to serve such construction. As the proposed project would involve the installation of accessory small structures, the total of which would be less than 10,000-square-foot in floor area, and extension of the water utility line, it qualifies as a Class 3 project. Therefore, the proposed project would be exempt under *State CEQA Guidelines* Section 15303, New Construction or Conversion of Small Structures.

Analysis

Section 15300.2 of the *State CEQA Guidelines* notes that projects that qualify for an exemption must also be evaluated relative to other factors, including location (Classes 3, 4, 5, 6, and 11 only), potential for cumulative impacts, potential for significant impacts, potential for effect on a scenic highway, potential to be located on a hazardous waste site, and potential to affect historic resources. An evaluation of these factors along with other environmental factors is provided below.

Aesthetics. The proposed project is not within the viewshed of a scenic vista or a state scenic highway, and thus would have no impact on a scenic highway. Although the proposed fire tower structure would be three stories and a roof, its total size would be approximately 2,238 square feet and it would not exceed the height of the existing building. As described under Project Description above, the new structures would be tinted or painted to blend in better with the brick cladding of the existing brick building. Therefore, they would not be noticeable and would not substantially degrade the existing visual character or quality of the site and its surroundings. Finally, the project would not add new lighting to the site. There would be no impact related to aesthetics.

Agricultural and Forest Resources. The project site is located in an urban setting and is not currently used for agriculture. The project site is not designated as Important Farmland on maps prepared pursuant to the

Farmland Mapping nor is it zoned for agricultural use, forest land or timberland. As a result, there would be no impacts to agricultural resources.

Air Quality. The proposed project would not require substantial excavation activities, and therefore, would not involve the use of heavy machinery. Based on the size of construction of the training tower and garage shed (a total of approximately 3,038 square feet), the proposed project would be well below any of the Bay Area Air Quality Management District's (BAAQMD) construction screening thresholds. As a result, emissions during construction would be less than significant. The proposed project would relocate students from the Airport Center to the John Adams Center. Therefore, the proposed project would not result in an increase in enrollment and would not add new vehicle trips. Thus, there would be no impact from operational emissions associated with mobile sources.

Biological Resources. The project site is located in an urban area of the City of San Francisco and is completely developed. There is no habitat for any rare or endangered species. In addition, no riparian or wetland areas are present on the project site. There are approximately four to five ornamental trees and a few shrubs at the project site (in the area of the proposed training tower). No trees would be removed as part of the proposed project and there would be no impact to nesting birds. Finally, there is no adopted habit conservation plan applicable to the site. For these reasons, the proposed project would have no impact to biological resources.

Cultural Resources. Historical Resources. The project site, originally Lowell High School, is comprised of the main four-story U-shaped school building (built 1911-1912). The 1938-constructed gymnasium is in the northeast corner of the parcel and the annex is in the northwest corner. As documented in the historical-resources memorandum provided in **Appendix A** of this document, for the purpose of the proposed project and to avoid any adverse impacts of affecting a historic property, the District is assuming John Adams Center to be eligible at the local level of significance for the National Register of Historic Places and the California Register of Historic Resources. It is also assumed that the historic property boundary is the entire parcel, including the main building, the gymnasium, and the annex. As discussed in the historical-resources memorandum, the proposed addition of the three-story fire training tower and apparatus storage shed would not demolish or materially alter the physical characteristics that convey the assumed historical significance of the project site. The proposed project would not alter the location, design, materials, or workmanship of the site. The proposed project, while part of an academic program, would marginally alter the historic academic character of the site as a scholastic institution that was considered San Francisco's college preparatory high school. Although the proposed new structures would alter the setting at the project site, these changes would be minor and would not adversely impact the assumed historic property. The training tower would be located behind the main building and the gymnasium, replacing the non-historic playground. Neither the training tower or the apparatus shed would block any elevation of the main building. Therefore, both proposed structures would not materially alter the main building. The back of the gymnasium has no windows or significant design features. The location of the new tower would have no impact on the historic gymnasium. The apparatus shed would block an elevation of the annex. The blocked elevation is not brick but is clad in painted plastered concrete, a material that indicates the elevation is tertiary. Therefore, the shed would not materially alter the annex.

The new structures would only be visible from residences on Grove Street. The training tower would be partially obscured by trees. The proposed project would not have the potential to materially alter any character-defining features of any of the residences. The nearby residences face an already busy campus and the addition of two minor structures would only minimally alter their view. The Secretary of the Interior's standards for the treatment of historic properties (SOIS) state that new additions and related new

construction that meet the standards can be any architectural style – traditional, contemporary, or a simplified version of the historic building. The proposed project would follow the SOIS by having the new structures appropriately scaled and as subordinates at the rear of the historic property and by maintaining the balance between differentiation and compatibility to maintain the historic character of the project site. To more closely follow the SOIS standards and to ensure the proposed project would not materially alter the setting, as noted under Project Description, the structures would be clad in concrete tinted and/or stained in a brick color approved by a professionally qualified architectural historian to ensure the buildings would adequately blend into the setting, be recognizable as modern structures, and be subordinate to the historic buildings. Therefore, the proposed project impact associated with historical resources would be less than significant.

Archeological Resources and Human Remains. The proposed project would demolish a playground area and install two prefabricated structures on concrete slabs. The project site is fully developed and has been previously disturbed and the proposed project would involve minimal ground disturbance to install utility lines and concrete slabs. Thus, there is low potential for the proposed project to adversely affect sub-surface archeological resources, including human remains. For this reason, there would be a less-than-significant impact to archeological resources.

Energy. As stated above, construction of the project would not involve the use of heavy machinery since the structures are prefabricated. The proposed project would relocate 25 students to the project site. from the Airport Center. There would be no net increase in vehicle trips. To the contrary of the Airport Center, John Adams Center is located in the City and some students may be able to use public transit or other alternative modes of transportation (such as bicycling) for their commute. Therefore, there impacts related to wasteful or inefficient energy consumption would be less than significant.

Geology and Soils. The project site is not located on a known earthquake fault and is not located within an Alquist-Priolo Earthquake Fault Zone. Therefore, the proposed project would not expose people or structures to risks associated with the rupture of a known earthquake fault. According to the geotechnical study conducted for the proposed project, the project site is not within a seismic hazard zone for liquefaction and there would be no potential for ground subsidence or liquefaction during a significant earthquake on a nearby fault. It is anticipated that the project would involve excavation of approximately five feet for the concrete slab. Based on soil testing, the project site does not meet the definition of a corrosive environment and the soils on the project site are not susceptible to expansion (Ninyo & Moore 2019). Thus, there would be a less than significant impact related to geology and soils. As noted above, the project site is fully developed and has been previously disturbed. Minimal soil disturbance needed to install the prefabricated structures would not have the potential to impact paleontological resources. Therefore, no impact to paleontological resources would result from the proposed project.

Hazards and Hazardous Materials. The project site is not located on a property associated with a hazardous site listed under Government Code Section 65962.5, also known as the Cortese List. The site is listed on the State Water Resources Control Board GeoTracker database as a LUST (leaking Underground Storage Tank) cleanup site. However, remediation was completed in 2010 (CSWRCB 2020). The case is considered closed, and thus, there is low potential for the proposed project to expose or disturb contaminated soil and/groundwater as minimal ground disturbance would occur as part of the project. The playground area that would be demolished under the proposed project, includes play equipment and sand materials that are not typically associated with the presence of asbestos or other hazardous materials. There would be a less-than-significant impact related to hazardous materials.

The project site is not located within two miles of an airport or private air strip. All construction activity would occur within the boundary of the Center. The proposed project would also not result in the closure of any street during construction, and thus would not physically interfere with emergency evacuation. There would be no impact related to hazards or hazardous materials.

Hydrology and Water Quality. The proposed project would demolish a playground area and install two prefabricated structures. Minimal ground disturbance would occur as part of the proposed project. In addition, the project site is mostly flat and paved. Therefore, the potential for runoff to occur on the project site during construction would be minimal. Furthermore, as discussed under Project Description, the District would require the contractor to implement BMPs to minimize erosion and sediment. During operation, all site runoff would be routed to the City's combined sewer system and would be treated prior to discharge to standards contained in the City's National Pollution Discharge Elimination System (NPDES) Permit for the Oceanside Treatment Plant. As a result, the proposed project would not violate any water quality standards or waste discharge requirements, and there would be no impact related to water quality.

The proposed project would not utilize groundwater as a source of water supply. The project site is currently developed and consists entirely of impervious surfaces. The proposed project would not modify the size of impervious surfaces on the project site, and therefore would not interfere with groundwater recharge. In addition, the proposed project would not alter the existing drainage pattern of the area, and thus would not affect the rate or amount of surface runoff and would not result in erosion or flooding on or off site.

The project site is located within an urbanized area in the City and County of San Francisco, approximately two miles west from San Francisco Bay. No large bodies of water are located near the project site. The project site is not within a flood zone nor is it within an area subject to flooding from sea level rise or from the failure of a levee or a dam (FEMA 2015). The project site is also not located in an area subject to a tsunami or seiche. For these reasons, there would be no impact related to flooding or other flood hazards.

Land Use and Planning. Pursuant to the CCSF's constitutional autonomy, development and uses on property owned or controlled by CCSF that are in furtherance of its educational purposes are not subject to local land use regulation. However, CCSF considers the land use policies and zoning regulations of the City when analyzing potential land use impacts under CEQA. The project site is located within a P (Public) zone and a 40-X height and bulk district. As the project site would continue to be used for educational purposes after construction of the fire tower and storage shed and as the height of the new structures would not exceed that of the existing buildings at the project site, the proposed project would not conflict with the City's zoning for the site, and there would be no impact related to land use.

Mineral Resources. There are no known mineral resources at the project site or in the surrounding area, and the proposed project would involve a negligible amount of grading that could result in the loss of known mineral resources (City and County of San Francisco 2004). There would be no impact related to mineral resources.

Noise. The proposed project would intermittently elevate noise levels during construction for about three to six months. As the project involves the construction of two prefabricated structures on concrete slabs and utilities extension, minimal grading or ground disturbance would be required. Grading typically contributes to elevated noise levels during construction. As there would be minimal grading of the site, there would be a less than significant noise impact to nearby sensitive receptors during construction.

During operation, fire training activities would result in an increase in ambient noise. However, increased noise level would be intermittent and would occur only during weekdays and regular class hours. In addition, the noise generated during fire training activities would be similar to the noise generated by current EMT training at the project site. There would be a less than significant impact related to noise.

Population and Housing. No residential units are present on the project site and none are proposed. The proposed project would not increase enrollment. The 25 students who were attending classes at the Fire Academy at the Airport Center would be attending classes at the John Adams Center. Therefore, the proposed project would not result in an increase of the City's population or require additional housing. There would be no impact related to population and housing.

Public Services. The proposed project would not increase the number of CCSF students as the 25 students that attend the Fire Academy would be relocated from areas within the City. Thus, there would be no increase in the City's population and no increase in demand for public services. The proposed project would have no impact related to the provision of public services.

Recreation. As the proposed project would not increase the number of CCSF students, there would be no increase in the City's population, and thus no increase in demand on recreational facilities. Therefore, the proposed project would have no impact related to the provision of recreational facilities.

Transportation. The proposed project would have a small increase in vehicles accessing the site during project construction and during operation once the training tower and shed are installed. However, the number of additional trips would be negligible. The proposed project would not alter the access and exit to the center and would not result in hazards related to geometric design features, such as sharp curves. In addition, the proposed project would not affect the circulation system including transit, roadway, and bicycle and pedestrian facilities. During operation, the 25 students that usually commute to the Airport Center would attend classes at John Adams Center. Relocating the Fire Academy to the City would allow some students to use public transit or other alternative modes of transportation (such as bicycling) for their commute. Therefore, impact related to transportation would be less than significant.

Utilities and Service Systems. The proposed project would install two new standard fire hydrants with a flow rate of 500 gallons per minute. A 6-inch line would extend from the existing water line south of the center to the proposed new hydrant near the southern entrance and would continue underground across a parking lot to the south of the fire tower and connect the second proposed fire hydrant. The hydrants would not connect to the City's Auxiliary Water Supply System, which is independent of the domestic water supply and built solely for the purpose of firefighting. Installation of the fire hydrants would require minor on-site trenching to connect the hydrants to the city water main. No change in city system capacity is required since use of the hydrants would be episodic. No additional wastewater requiring treatment would be generated. There would be no impact related to utilities and service systems.

Wildfire. The proposed project is located in an urbanized area that does not contain any wildlands or urbanized areas intermixed with wildlands. The project site is not located in a Very High Fire Hazard Severity Zone as determined by CAL Fire. There would be no impact related to wildfires.

Cumulative Impacts. The proposed project involves the installation of prefabricated structures and, as analyzed above, would not result in construction impacts. Furthermore, the proposed project would not increase student population and would not combine with other projects in the area to result in cumulative operational impacts. As such, there are no other projects in the vicinity of the site that would, in conjunction with the proposed project, generate a cumulatively considerable impact.

References

San Francisco Property Information Map. Zoning Information. Available at: [https://sfplanninggis.org/pim/?tab=Zoning Information&search=1860+HAYES+ST](https://sfplanninggis.org/pim/?tab=Zoning%20Information&search=1860+HAYES+ST), accessed June 10, 2020.

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CAL FIRE. Fire Hazard Severity Zones Maps. Available online at: https://osfm.fire.ca.gov/media/6791/fhszl06_1_map38.pdf, accessed June 12, 2020.

California Department of Conservation. Division of Land Resource Protection, Farmland Mapping and Monitoring Program. San Francisco Bay Area Important Farmland. 2012. Available online at: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/regional/2012/bay_area_2012_fmmp_base.pdf, accessed June 12, 2020.

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Federal Emergency Management Agency (FEMA). 2015. Preliminary Flood Insurance Rate Maps. November 12.

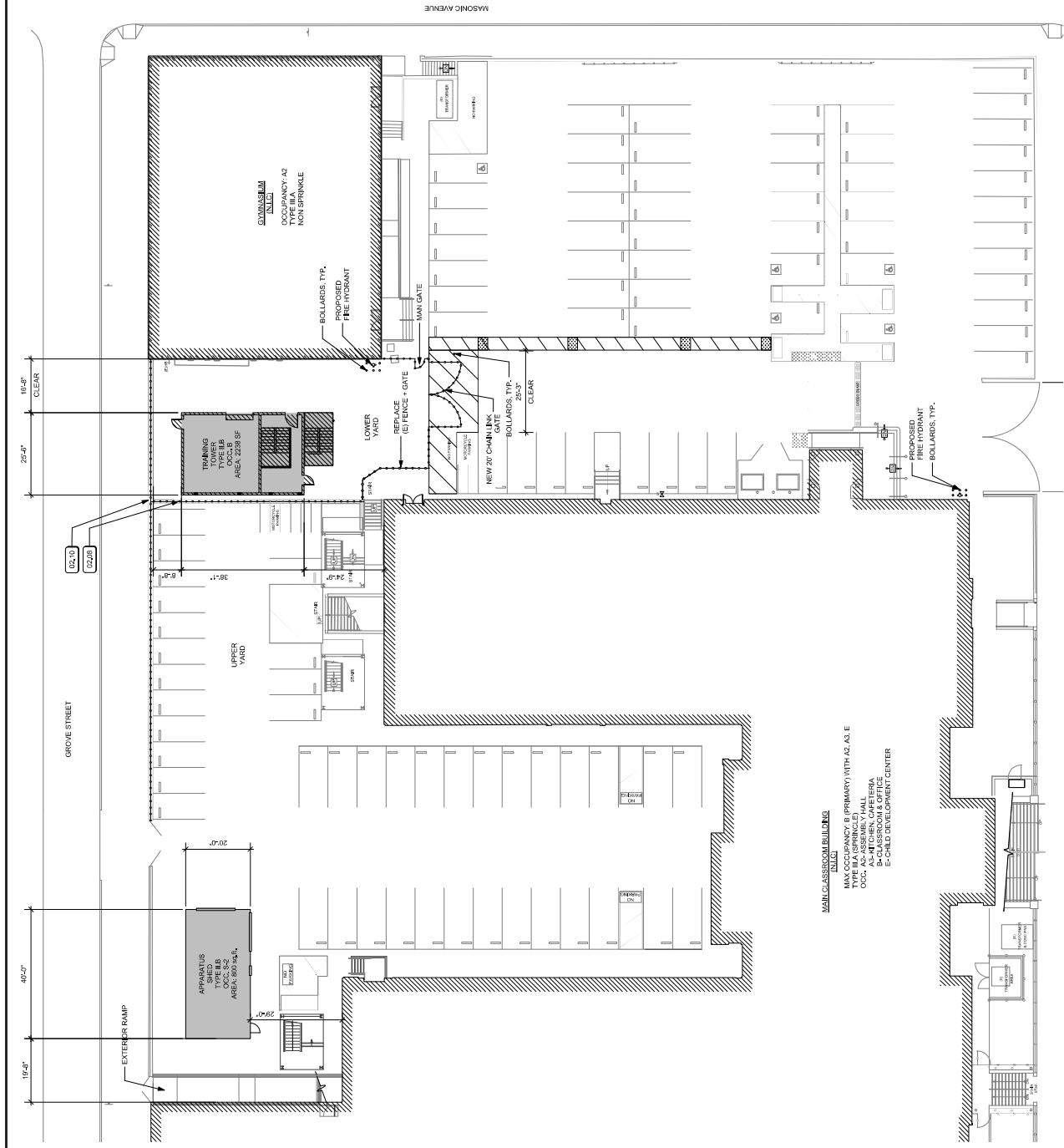
Ninyo & Moore Geotechnical & Environmental Services Consultants. *Geotechnical Evaluation and Geologic Hazards Assessment, Fire Academy Relocation Project*. July 8, 2019.



SOURCE: Google Earth, 2020.

FIGURE 1

Regional Location and Project Site Vicinity



SOURCE: Hamilton and Aitken Architects, 2020.

FIGURE 2

APPENDIX A

Historic Resources Memorandum



582 MARKET ST. SUITE 1800
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MEMORANDUM

Date: September 28, 2020

To: Rima Ghannam
Principal
Impact Sciences
505 14th Street, Suite 900
Oakland, CA 94612

From: Meg Scantlebury, Architectural Historian

Project: Project No. 2019030, Phase 3, City College of San Francisco, John Adams Center
Fire Academy Relocation Project

Re: **Project Compliance Review**

Via: Email

The following memo has been prepared for architectural preservation consulting services in connection with the proposed Fire Academy Relocation Project located on the City College of San Francisco's (CCSF) John Adams Center, 1860 Hayes Street, San Francisco, California. This memo includes a description of the John Adams Center, built in 1911-1912 as Lowell High School, part of the San Francisco Public School District and assumes the property to be eligible for the California Register of Historical Resources (CRHR) and the National Register of Historic Properties (NRHP). This memo describes the character-defining features and analyzes the potential impacts of the proposed project on the historic property. It also describes how the design will follow the Secretary of the Interior's guidelines for the treatment of historic properties to ensure that the project will not adversely affect the historically significant property. To comply with these standards and to ensure the proposed project will not materially alter the setting, **the new structures will be tinted or painted to blend in better with the brick cladding of the historic property.**

PROJECT DESCRIPTION

The proposed Fire Academy Relocation project (proposed project) would relocate the Fire Academy currently administered at CCSF's Airport Center located at the San Francisco International Airport to the John Adams Center. The John Adams Center currently includes classroom and field exercises for

emergency medical technician (EMT) level one students. Upon project implementation, the John Adams Center would house the EMT program and the Fire Academy. The existing Fire Academy facilities at the Airport Center would be decommissioned.

The proposed project includes the installation of a new prefabricated 2,238 square-foot three-story training tower with an approximately 866 square-foot footprint, and an 800 square-foot single story prefabricated apparatus storage shed (see Figure 1, site plan). The structures would be clad in concrete tinted and/or stained in a brick color approved by a professionally qualified architectural historian to ensure the buildings would adequately blend into the setting, be recognizable as modern structures, and be subordinate to the historic buildings. The new training tower would be located west of the existing gymnasium building, in an area formerly used as a playground for the childcare center. The playground equipment and associated play area are not in use and would be removed as part of the project. The training tower would use theatrical smoke in lieu of live fire to simulate fire conditions for student training exercises. The tower area would be enclosed by a chain-linked fence. The storage shed would be located further west of the proposed training tower location, in the existing parking lot. Both structures would be installed on a concrete slab.

There would be two fire hydrants constructed to train students on applying water and using firehoses, one located south of the training tower and another located further south near the southern entrance of the center. Water for the new hydrants would be drawn via a 6-inch line that would extend underground within the center parking lot and connect to an existing water main and line within the sidewalk on the south side of the center. Construction is expected to begin in winter 2020 and would last approximately three to six months.

Figure 1. Site Plan. Solid shaded shapes are the two proposed new structures.

ANALYSIS/EVALUATION

For the purposes of this project, the John Adams Center, formerly Lowell High School, is assumed to be eligible for the CRHR and the NRHP. Several other San Francisco schools have been identified as local landmarks by the San Francisco Historic Preservation Commission, including Balboa High School and Mission High School. This approach affords the property to be protected as if it is a fully evaluated and eligible historic property while allowing the project implementation to be expedited.

A Brief History of Lowell High School

Lowell High School was established in 1856 and, as such, is the oldest school on the West Coast. The subject building was the third documented location for the school.¹ The building housed Lowell High School from 1913 until 1962 when the school moved to its current location on Eucalyptus Avenue in the Outer Sunset.² The four-story, 133,379 square-foot subject building was built in 1911-1912 and opened to students in January, 1913.³ The 15,000 square-foot gymnasium was built in 1938; the 3,000 square-foot annex may also have been built in 1938.⁴ The annex is not currently in use because it does not meet safety requirements in compliance with the 1933-enacted Field Act, California's first major earthquake safety policy initiative.⁵ The architectural firm that designed the school building was O'Brien and Werner. According to a San Francisco Examiner article dated October 2, 1910, "The new Lowell High School structure will be of the class A type, having a steel frame with brick and concrete exterior walls and concrete floors and stairways, all re-enforced... its cost is estimated at \$340,000."⁶



Figure 2. Second Lowell High School, on Sutter Street, between Gough and Octavia. Photo, taken between 1894 and 1913, courtesy of the San Francisco Public Library.

¹ San Francisco Chronicle. May 26, 2012.

² Ibid.

³ Ibid.

⁴ 1950 Sanborn Fire Insurance map. San Francisco Public Library Digital Archives.

⁵ Legislative Politics and Seismic Safety: California's early years and the Field Act, 1925-1933. Robert A. Olson. San Francisco Public Library Digital Archives. https://mitigation.eeri.org/files/Olson_Legislative_Politics_CA.pdf

⁶ San Francisco Examiner, Oct 2, 1910.



Figure 3. Lowell High School, 1860 Hayes Avenue, c1913.
Photo courtesy of the San Francisco Public Library.



Figure 4. Lowell High School's boy's gym, 1860 Hayes Avenue, c1938. Photo courtesy of the San Francisco Public Library.

The 1920s was the golden age of school construction in San Francisco, when enrollment increased by 45% and 49 schools were added to the district to accommodate the influx of students.⁷ Prior to the citywide construction of new high schools and the introduction of junior high schools in the district, San Francisco high schools were specialized rather than enrolling students according to where they lived. In the 1920s the San Francisco Board of Education changed course and supported the national trend away from specialized schools and was of the opinion that no fundamental educational considerations seemed to warrant the retention of any high school as an exclusive academic school or any other specialized school. On March 20, 1924 the Lowell High School Representative Committee presented a statement to the San Francisco Board of Education objecting to the Board's proposed change in curricula. The Board disagreed, but apparently the Lowell Committee was successful and Lowell High School remained the city's college preparatory school, where students had to be recommended to attend by their teachers or counselors.⁸

On November 1, 1934 a fire destroyed the interior of the 1911 building. It had been undergoing "earthquake-proofing", presumably to comply with the Field Act, and students had been attending classes at Galileo High School during the retrofit.⁹ Much of the interior was destroyed. The Board originally anticipated the seismic work would be done by the end of 1934. The repairs needed to address the fire damage delayed the reopening until June 1935.



Figure 5. Lowell High School on fire, November 1, 1934. Photo courtesy of the San Francisco Public Library.

⁷ Balboa High School Landmark Designation, Final Case Report, June 1, 1994.

⁸ Report of the Reviewing Committee on the Reorganization and Housing Program of the San Francisco Schools. May 5, 1924. San Francisco Public Library Digital Archives.

⁹ San Francisco Examiner November 2, 1934.

Lowell High School students continued to attend classes at the Hayes Street building until 1962, when the new Lowell High School campus was completed, and the institution moved. That same year the Hayes Street building's future use became the center of a citywide racial debate. The School Board's plan for the building was to repurpose it as the new Central Junior High School to relieve the city's overcrowded junior highs and serve the surrounding neighborhood. Approximately 60% of the student body would be Black and it would therefore be segregated because the city's overall Black population was about 20% at the time. The U.S. Supreme Court's decision on the *Brown v. Board of Education of Topeka* (347 U.S. 483, 1954) stated that "separate educational facilities are inherently unequal."¹⁰ Except for Lowell High School, students were assigned to schools based on neighborhood. Consequently, according to the Examiner, the building's "padlocked doors have become a symbol of racial strife in this city known for its tolerance and brotherly love."¹¹ The School Board briefly considered opening the Hayes Street building to temporarily reduce overflow but ultimately decided to drop the idea and appoint a subcommittee to study the segregation question and postpone establishing a policy on racial equality.¹² The Board refused to review the district boundaries and in October 1962 they opened the building only to enrollees in the city's adult education and job training program.¹³ It would be called the John Adams Adult High School.¹⁴ While the subject building was no longer the symbol of the controversy, the School Board's attempt to avoid a dispute was unsuccessful. The National Association for the Advancement of Colored People (NAACP) filed suit with the San Francisco Board of Education on October 2, 1962.¹⁵

A state law passed in 1965 required that all cities with school districts that operated junior or city colleges establish a separate independent college district by July 1, 1970. The city formed the San Francisco Community Colleges District (District) in 1970. The new District included the Main Campus on Ocean Avenue as well as all the staff, programs, and buildings of the Adult and Occupational Division of the San Francisco Unified School District. The new District established two separate divisions in 1974: the Main Campus, where for-credit classes were offered, and the eight neighborhood centers, including the John Adams Center that offered the non-credit classes of the Adult and Occupational Division.

Property Description

The John Adams Center is located on a sloping site at the intersection of Hayes and Ashbury Streets. It comprises a full city block and is generally sited east-west. Hayes Street is to the south, Ashbury Street on the east, Grove Street to the north, and Masonic Avenue on the west. The neighborhood, the North Panhandle, is a densely built neighborhood of primarily late Victorian/pre-war transitional two-to-three story closely spaced or immediately adjacent residences of two flats each, with larger four-story apartment buildings anchoring the corners.¹⁶ Some corner buildings and about half of the flats along Hayes Street facing the subject property contain shops or restaurants on the ground floor.

¹⁰ <https://www.history.com/news/brown-v-board-of-education-the-first-step-in-the-desegregation-of-americas-schools>

¹¹ Examiner September 2, 1962

¹² Examiner September 20, 1962

¹³ Examiner September 2, 1962

¹⁴ Examiner August 24, 1964.

¹⁵ Examiner December 11, 1962

¹⁶ 1915 Sanborn map. San Francisco Public Library Digital Archives.

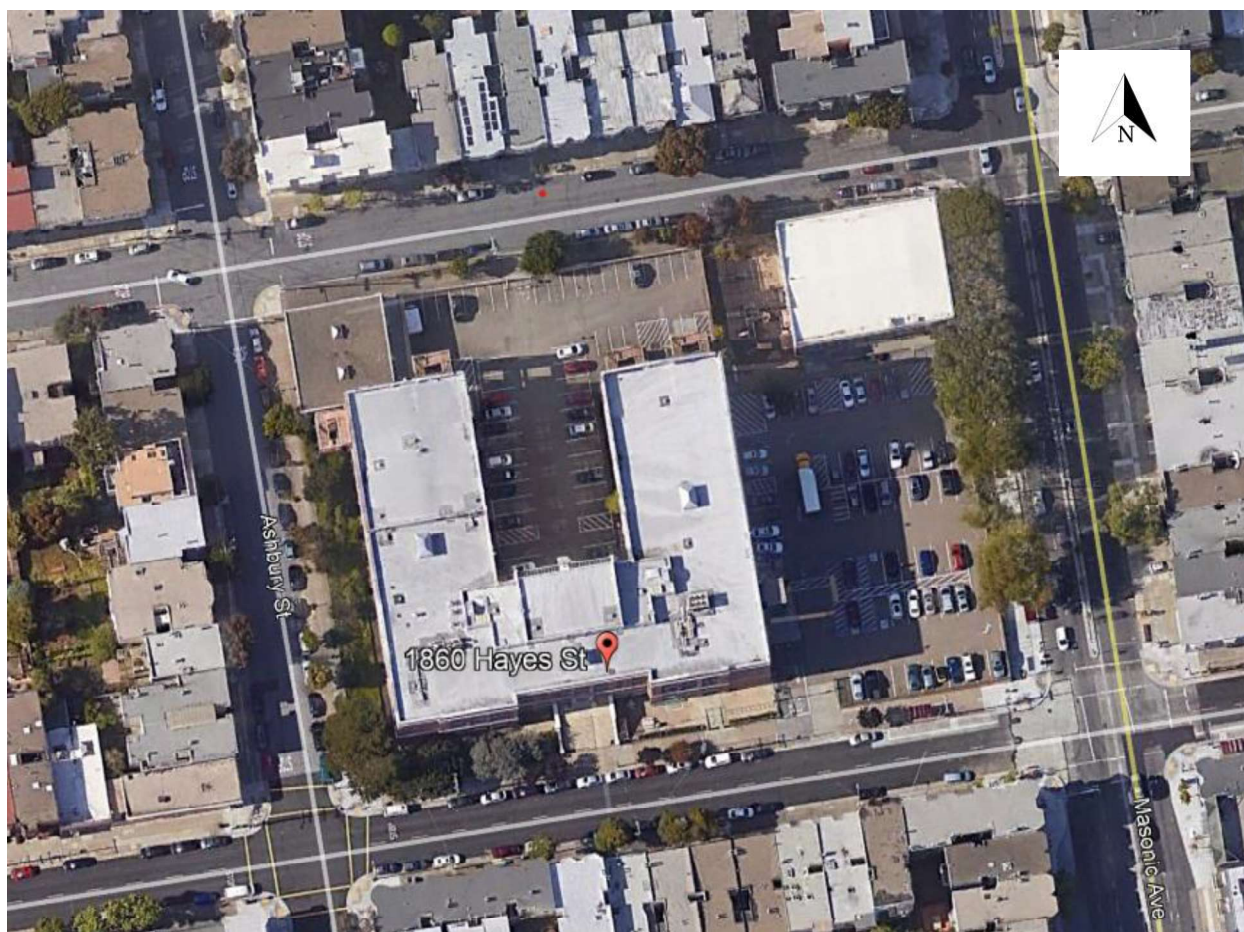


Figure 6: Aerial view of the subject property. Photo courtesy of GoogleEarth Pro. Image date 2018.

The subject property, originally Lowell High School, is comprised of the main four-story U-shaped school building (built 1911-1912), sited primarily in the southwest portion of the 104,840 square-foot parcel (APN 1196001)¹⁷ with an approximately 32,000 square-foot footprint. The 1938-constructed gymnasium is in the northeast corner of the parcel and the annex is in the northwest corner. There are two parking lots. The student lot is rectangular, on the southeast portion of the parcel, south of the gymnasium and east of the main building with access from Hayes Street; the other, the faculty and staff lot, is L-shaped and behind the main building and fills the space between its two rear wings, with access from Grove Street.

The primary façade faces Hayes Street. It is symmetrical and divided into five bays: the widest central bay is recessed and flanked by bays of four rows of three sets of windows which are then flanked by slightly recessed solid brick bays. A string course between the second and third floors made of painted terracotta and brick dentils marks the transition between these two floors the entire width of the primary

¹⁷ San Francisco County Assessor website. <https://sfplanninggis.org/pim/?pub=true>

façade and wraps around onto the street-facing façades of the two wings. The walls are mostly brick with occasional decorative light-colored terracotta accents. The brickwork bond is Flemish with lighter colored stretchers and darker headers, laid in courses of about 15 then broken by a row of soldier-laid brick. The brick sheathing on the first and second floors are laid primarily flat; the brickwork on the third and fourth floors are laid in various vertical planes that create pilasters between the windows which are topped with decorative terracotta capitals. The windowsills protrude slightly, and the bricks are laid in soldier form, vertically with the longer face edge exposed. The lintels are also soldier-laid brick. The brickwork on the lintels and sills is continuous on the walls and visually connects the openings. The brickwork on the two sets of flanking bays and the street-facing elevations of the wings is identical.



Figure 6: Main Entrance. 9/21/2020.

The entablature across the entire façade and wings is generally the same and the roof is flat. The architrave is brick with a pattern of vertical and horizontal bricks set in a series of slightly protruding cross forms. It is topped with a simple flat protruding light terracotta frieze above which is a broad course of brick finally topped with a slender terracotta cornice. The cornice above the two flanking bays in the primary façade is slightly more decorative than that of the rest of the primary facade and the wings – it is not fully flat but is broader and rises to a central peak.

The wide central bay in the primary façade contains the building's main entrance, which is on the second story, accessible by a broad light-colored concrete staircase which ends at a landing four steps below the entry doors. The broad set of stairs are flanked by matching plastered concrete ascending walls; metal railings are adjacent to each of the ascending walls and a third rail is centered within the steps. The

entrance is finally accessed by four double-returned steps. Double green metal and glazed doors are recessed in the opening, topped by three vertical transom windows, separated by matching green metal mullions. The recessed doors are centered in a light terracotta surround with a stepped back reveal. A decorative egg-and-dart pattern is formed into the soffit and on either side of the entrance. Above the soffit is a plain flat frieze with a small light in the center. The cornice consists of a bed molding of a row of dentils then a row of eggs-and-darts; the corona and cymatium are stepped slightly out over the entrance. It is supported on each side by large modillions.

On either side of the large stairway are two sets of tripartite wood windows; the central windows are broader than the side windows and are double hung. The windows are recessed with a brick surround; the windowsill is of the same light-colored terracotta as the entrance surround. The second story windows are of the same design but topped with tripartite transom windows. Three flank each side of the main entrance. The third and fourth floor window patterns differ from those on the second floor but are still symmetrical. From left to right on each floor are a tripartite window with the tripartite transom, then a single double-hung window with a transom light, then three sets of tripartite windows – the middle ones are above the entrance door – then another single double-hung window, and finally a tripartite window with the tripartite transom window. All are recessed with a brick surround and a terracotta sill.

The two slightly protruding bays that flank the central bay each contain four rows of three tripartite windows matching those within the central bay. The outside bays, as stated before, are of solid brick and step back slightly.



Figure 7: West-facing elevation. 9/21/2020.

The east and west street-facing elevations repeat the brick and window patterns with a series of regularly placed tripartite windows with tripartite transom windows. Because of the grade change, the bottom story of the west façade is slightly subgrade. Each of these façades has an attached exterior metal staircase; the west façade also has a green metal and glass elevator shaft. The ends of the two wings facing north are solid brick laid in the same Flemish bond and alternating soldier pattern and each has exterior metal staircases attached. There is a secondary entrance on the end of the eastern wing. The rear and two wings of the building form a courtyard that is used for parking. The fenestration of all three inward-facing elevations is identical to the street-facing elevations but the wall surface is light-colored smooth plastered concrete and the windowsills are a darker colored plaster. The central, north facing wall has a shaft in the middle flanked by two sets of the tripartite windows on either side and on each floor. The wall slightly recesses where it joins the wings; in each recessed section are two sets of single double-hung windows topped with a transom window. There is a fifth floor atop this section of the building; the lower half of the wall is solid and topped with clerestory windows.



Figure 8: Central Courtyard. Photograph facing south. 9/21/2020.

The 1938-built gymnasium is two stories. The lower story on the north, east, and south elevation is clad in light-colored plastered concrete above which the rest of the elevations are clad in brick laid in the same pattern as main school building, with terracotta-topped pilasters dividing five windows; four are large multi-light metal windows and the center opening is filled with a decorative diamond patterned material. The north elevation of the first floor contains five sets of 32 light green aluminum replacement windows, the east elevation contains four identical windows, and the south elevation contains four tripartite windows and the entrance. The east elevation is completely windowless and smooth plastered concrete.



Figure 8: Gymnasium main entrance, south elevation. 9/21/2020.

Only three elevations of the single-story annex are visible. The west and north elevation are sheathed in brick also laid in the Flemish bond broken up by occasional rows of soldier-laid brick; the east façade is sheathed in a light-painted plastered concrete. The west and east elevations contain an entrance and four tripartite wooden window sets topped with three transom windows. The north elevation contains four small recessed windows placed at the same height as the transom windows on the east and west elevations. The recessed entrance on the north elevation is protected by a chain-link “barn” door. Much of the brick walls on the north and west elevation have been painted over apparently to hide graffiti.

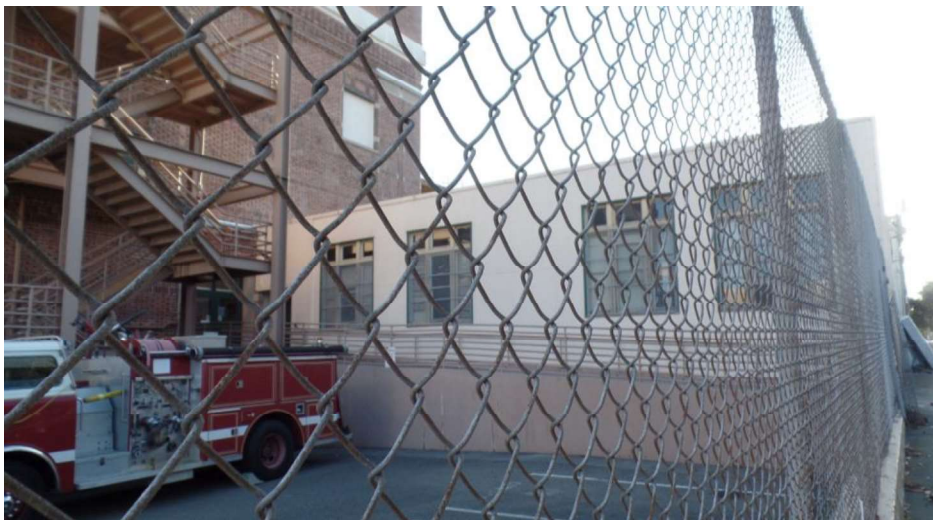


Figure 9: Annex, east elevation. 9/21/2020.

The parking lots are surrounded by a chain link fence and are elevated above the sloping streets. The retaining walls on the north, east and south sides are painted with colorful murals.

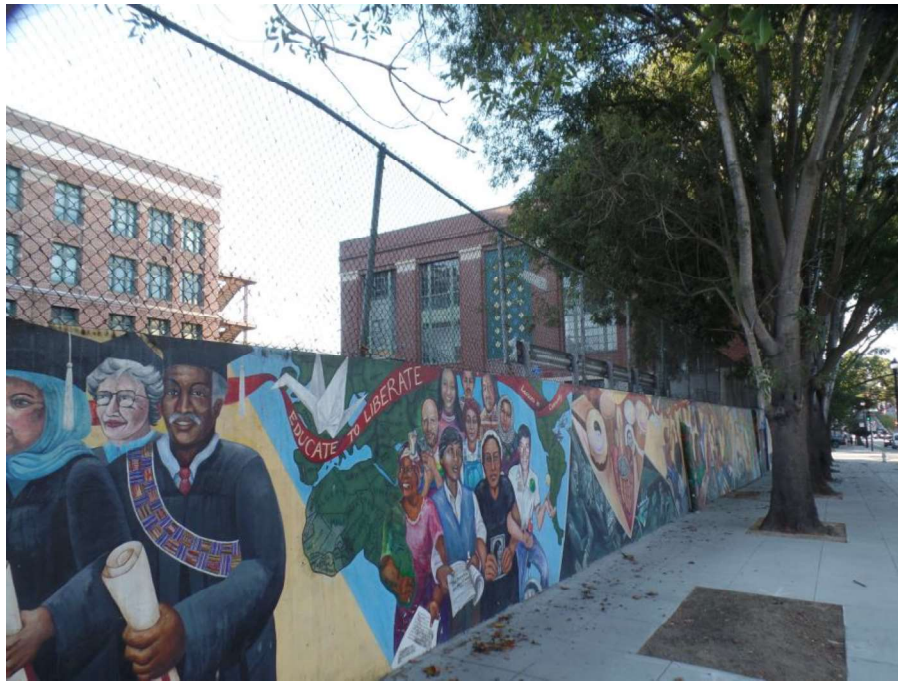


Figure 10: Parking lot and retaining wall mural facing Masonic Avenue. 9/21/2020.

Historic Significance

As stated earlier, CCSF is assuming the John Adams Center is eligible at the local level of significance for the NRHP and the CRHR for the purposes of the Fire Academy Relocation Project only. This assumption is predicated on the likelihood that the property would be found to be eligible for its association with the early establishment of the San Francisco school system (criterion A/1) and for its embodiment of the distinctive characteristics of early San Francisco academic architecture (criterion C/3). It also assumes that the period of significance under A/1 would be 1911-1962, the period spanning between the original construction of the main building as Lowell High School and the year when Lowell High School was relocated; under C/3 the period of significance would be between 1911-1938, when the Hayes Street campus, including the gym, was constructed and completed, including the retrofit and restoration of the main building in 1934-1935. It is also assumed that the historic property boundary is the entire parcel, including the main building, the gym, and the annex. This approach enables an expedited evaluation for the potential for the proposed project to adversely affect the historic property. The following is a brief discussion of the NRHP and CRHR criteria for evaluation.

The National Register Criteria for Evaluation

The National Register of Historic Places (NRHP) is the nation's master inventory of known historic resources. It is administered by the National Parks Service (NPS) in conjunction with the State Historic Preservation Office (SHPO). The National Register includes listings of buildings, structures, sites, objects, and districts possessing historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local levels. The National Register criteria and associated definitions are outlined in the National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation. The following is quoted from National Register Bulletin 15:

Criteria

Generally, resources (structures, sites, buildings, districts, and objects) over 50 years of age can be listed in the National Register provided that they meet the evaluative criteria described below. Resources can be listed individually in the National Register or as contributors to an historic district. The National Register criteria are as follows:

- A. Resources that are associated with events that have made a significant contribution to the broad patterns of history;
- B. Resources that are associated with the lives of persons significant in our past;
- C. Resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant or distinguishable entity whose components may lack individual distinction; or
- D. Resources that have yielded or may likely yield information important in prehistory or history.

The California Register Criteria for Evaluation

The California Register of Historical Resources (CRHR) is the official list of properties, structures, districts, and objects significant at the local, state, or national level. California Register properties must have significance under one of the four following criteria and must retain enough of their historic character or appearance to be recognizable as historical resources and convey the reasons for their significance (i.e. retain integrity). The California Register utilizes the same seven aspects of integrity as the National Register. Properties that are eligible for the National Register are automatically eligible for the California Register.

- 1. Associated with events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States;
- 2. Associated with the lives of persons important to the local, California or national history
- 3. Embodies the distinctive characteristics of a design-type, period, region, or method of construction, or represents the work of a master, or possesses high artistic value; or

4. Yields important information about prehistory or history of the local area, California or the nation.

CRHR criteria are similar to National Register of Historic Places criteria, and are tied to CEQA, so any resource that meets the above criteria, and retains a sufficient level of historic integrity, is considered an historical resource under CEQA.

Historic Integrity

Integrity is the ability of a property to convey its significance. For a property to be eligible for any of the four NRHP or CRHR criteria it must also have retained its historic integrity. Integrity is the retained ability for the property to express its significance. For the purposes of the Fire Academy Relocation Project, CCSF is assuming the John Adams Center is eligible for the NRHP and the CRHR.

Consequently, its integrity of location, design, setting, materials, workmanship, feeling and association has been assessed. The following is a brief discussion on the historic integrity of the property.

Location: The property retains its integrity of location. It has not been moved.

Design: The overall design of the campus has been retained. Review of historic photographs of the main building and the gym, the primary resources that make up the property, indicate little of the exterior of the main building or gym has changed. Alterations to the main building include the addition of exterior metal switch-back staircases and an elevator shaft; it also appears that the doors of the main building have been replaced. The gym is equally intact; the only visible alteration is the infill of the center large windows on the north, east and south elevation with a decorative patterned solid material and the replacement of the first floor windows. These alterations are minimal and easily reversible.

Setting: The property maintains integrity of setting. Review of the 1915 Sanborn Fire Insurance map indicates that the neighborhood was already largely developed by the time the school was built. Review of the current setting by a qualified architectural historian indicates that the neighborhood has changed little since it was developed in the late 19th century and early 20th century.

Materials: Overall the property retains its integrity of materials. Brick, light-colored terracotta, and plastered painted concrete are the primary materials used, along with the wood and glass used for the fenestration. Historic photographs indicate the original materials have not been replaced.

Workmanship: The integrity of workmanship has been retained. The design and construction of the two primary buildings are physical evidence of the period and tradespeople's crafts.

Feeling: The integrity of the feeling of the campus has also been retained. It was built as an academic institution and is still used as a school. It continues to be able to express its aesthetic and historic sense of its time during the periods of significance.

Association: The property retains its integrity of association. As with its retained integrity of feeling, the buildings were built as a school and they still express their historic association with education.

Historic Integrity Summary

The John Adams Center, formerly Lowell High School, retains all seven aspects of integrity.

Character-Defining Features

Character refers to the visual aspects and physical features that comprise the appearance of a historic property. The character-defining elements include the overall shape of the buildings, its materials, craftsmanship, decorative details, as well as its site and environment. Assessment of various features is done according to a prioritized evaluation system. Once the character-defining features have been identified, each is assigned a priority rating to create a sense of the relative historical importance of these spaces and features. A rating scale of “Primary-Important-Contributing-Non-Contributing” is used. In general, this system allows for the analysis of a property as a whole to guide what types of work should be done, and where such work could be completed with the least damage to the historic integrity of the district or the individually eligible building.

The character-defining features of the John Adams Center include:

Primary

- The main school building – its siting, design and materials
- The gymnasium – its siting, design and materials

Important

- None

Contributing

- Annex

Non-Contributing

- Play yard
- Parking lots
- Fence
- Murals

California Environmental Quality Act (CEQA)

15064.5. Determining the Significance of Impacts to Archaeological and Historical Resources

(a) For purposes of this section, the term “historical resources” shall include the following:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical

resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

(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:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(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), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

(4) A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall

ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

(5) When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of environmental documents.¹⁸

§ 21084.1. Historical Resource; Substantial Adverse Change

A project 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. A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section.¹⁹

Impacts Analysis

When analyzing whether a proposed project would result in an adverse change to a historical resource, the seven aspects of integrity were considered.

The proposed addition of the three-story fire training tower and apparatus storage shed will not demolish or materially alter those physical characteristics that convey the property's assumed historical significance. The proposed project would not alter the location, design, materials, or workmanship of the property. The feeling and association of the property is that of a school; the proposed project, while part of an academic program, will marginally alter the historic academic character of the property since the school was a scholastic institution that was considered San Francisco's college preparatory high school; the introduction of this training structure is inconsistent with the history of Lowell High School academics. Although the additional buildings will alter the setting, the changes to the feeling, association, and setting are minor and will not adversely impact the historic property. The three-story fire training tower is proposed to be located behind the gymnasium, replacing the non-historic playground. The back

¹⁸ Association of Environmental Professionals, 2018 CEQA: California Environmental Quality Act, Statute and Guidelines, 141–143. Available online: http://resources.ca.gov/ceqa/docs/2018_CEQA_Statutes_and_Guidelines.pdf.

¹⁹ California Environmental Quality Act, Statute and Guidelines, 45. Available online: http://resources.ca.gov/ceqa/docs/2018_CEQA_Statutes_and_Guidelines.pdf.

of the gymnasium has no windows or significant design features, therefore locating the tower in this location would have no impact on the historic gymnasium. The tower is also located behind the main building and does not block any elevation of the building nor will it or the apparatus shed materially alter the main school building. The apparatus shed will block an elevation of the annex, a lesser but still contributing component of the historic property. The blocked elevation is not brick but is clad in painted plastered concrete, a material that indicates the elevation is tertiary. Therefore, the shed will not materially alter the annex.

The potential for the new buildings to impact the larger area in which the historic property is located must also be considered. The new structures would only be visible from residences on Grove Street. The tower would be partially obscured by trees. Evaluation of the potential for the residences to be eligible is beyond the scope of this study, and even if they were historically significant, the proposed project would not have the potential to materially alter any character-defining features of any of the residences. They face an already busy campus, a campus that is generally contemporary with the residences. The addition of two minor structures would only minimally alter the view from the strip of residences.

The Secretary of the Interior's standards for the treatment of historic properties (SOIS) with respect to new exterior additions and related to new construction states that new additions and related new construction that meet the standards can be any architectural style – traditional, contemporary, or a simplified version of the historic building. However, there must be a balance between differentiation and compatibility to maintain the historic character of the significant property. Additions or infill should be placed at the rear of the historic property and be subordinate. It should be appropriately scaled to maintain its character and that of the site and setting.²⁰ While the proposed project does follow the SOIS on most aspects with regard to infill or additions to historic properties, the emphasis of these specific standards is to ensure a design is subordinate and its visibility is minimized. To more closely follow these standards and to ensure the proposed project will not materially alter the setting, CCSF will tint or paint the new structures to better blend in with the brick cladding of the historic property.

Cumulative Impacts

Past alterations to the property have been minimal and reversible. These include the addition of new metal switch-back staircases and an elevator shaft to the main building, replacement first-floor windows and the decorative infill of three large gymnasium windows. The proposed project will not result in cumulative impacts. Future projects that might add more buildings or structures within the historic property boundary could result in cumulative impacts. It is recommended that should any such projects be proposed, the John Adams Center should be fully evaluated for historical significance and the proposed projects be analyzed for their potential to materially alter the property should it be found to be eligible for the CRHR and the NRHP.

cc: Mike Garavaglia, Garavaglia Architecture; John Anderson, Impact Sciences

²⁰ The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings. U.S. Department of the Interior, National Park Service Technical Preservation Services. <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>