2.6 HISTORIC RESOURCES

2.6.1 CONCURRENCE WITH EIR

Comment

The DEIR includes a comprehensive list of buildings and structures on Yerba Buena Island and Treasure Island that are considered historical resources for purposes of CEQA. Those already listed in the National Register of Historic Places include Building 1 (the Administration Building), Building 2 (the Hall of Transportation), Building 3 (the former Palace of Fine and Decorative Arts), the Senior Officers’ Quarters Historic District (also known as the “Great Whites”), Quarters 10 and its contributing garage (Building 267), and the Torpedo Assembly Building (Building 262).

The DEIR also evaluates thirteen individual extant buildings and structures that have reached 50 years in age. Of those thirteen, two were found to meet the criteria for inclusion in the California Register of Historic Resources (CRHR). The Damage Control Trainer USS Buttercup (housed in Building 341) is determined eligible under Criterion 3 - Design Construction, and the landscape elements that surround Buildings 1, 2, and 3 were found to contribute to the significance of the buildings under California Criterion 1 - Events, for their association with the Golden Gate International Exposition of 1939. Based on the information provided in the DEIR, Heritage concurs with these findings.

With regard to potential impacts on the above-mentioned historic resources, we agree that the proposed rehabilitation of Buildings 1, 2, and 3 will not result in a significant adverse impact, as the project’s Design for Development guidelines require that all work be consistent with the Secretary of the Interior’s Standards for Rehabilitation. Likewise, the proposed project would not alter the contributing landscape areas of Buildings 2 and 3 in a manner that would significantly diminish their ability to contribute to the significance of the resource as it exists now. However, as acknowledged in the DEIR, the proposed project will have a significant and unavoidable adverse impact on the USS Buttercup battleship simulator.

1 Although not included in the DEIR, three previous historic resource surveys of Yerba Buena Island and Treasure Island are referenced in support of its findings. These surveys should be made available for public review in conjunction with the release of the Final EIR. In particular, Heritage would like to see if they contain information about the chapel, completed in 1943, which may potentially be a contributing resource, and which has been the subject of some public comment. (Mike Buhler, Executive Director, San Francisco Architectural Heritage) [18.1b]

Response

This comment expresses general concurrence with the analysis and basic conclusions of the EIR. The previous historic resource surveys referenced in the Draft EIR were and continue to be available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E as part of the record for the EIR. For more information regarding the chapel, see Subsection 2.6.2, Navy Chapel, below.
2.6.2  NAVY CHAPEL

Comments

In addition, retention and preservation of the Base Chapel must be thoroughly explored. This should be done in light of its historic standing: serving the Navy, active duty, reserve and retired – as a site for regular services in addition to thousands of weddings and funerals. As a retired florist I personally serviced innumerable weddings and funerals in the Chapel during the later half of the 1900’s – there is a long tradition here. Certainly, if the concept is one of ‘community’ for 18,500 people, providing a place of worship should be equal to providing an educational institution.  *(Ron Miguel, President, San Francisco Planning Commission)*  [7.7]

8.  Concurring with TIDA Director Elberling, who made his feelings clear at the joint TIDA/Planning Commission meeting on August 12, 2010, the CAB considers the Navy Chapel an historic resource worthy of preservation. The DEIR doesn't address this resource and needs to be amended. The CAB strongly supports a preservation alternative which maintains the Chapel and keeps it on the island.  *(Treasure Island/Yerba Buena Island Citizens’ Advisory Board)*  [8.8]


Of course the Chapel is the key building at issue in this matter, which is located on the site of the proposed Culture Park and thus may not necessarily be demolished, although the Program does not include it even as a contingency, which it should, and which the Program addition of 50,000 sq ft to the Program per 2. above would include. The Chapel is currently located where the Plan proposes a “culture park,” but apparently the Chapel is demolished in the process. If that is the Plan, then this needs to be stated clearly.  *(John Elberling, TIDA Board Member)*  [22.4]

Please find attached our petition of 316 signatures to grant the chapel on Treasure Island the same status as the Great White Mansions on Yerba Buena Island and to preserve the building in a manner consistent with the other historic buildings on the base.

For decades the chapel served the millions of navy personnel that were stationed at or departed from Naval Station Treasure Island. For many it was the spiritual heart of the base and provided a non-denominational place for worship and comfort.

In addition, the chapel was one of the first buildings constructed utilizing materials from the deconstructed GGIE exhibits. It is an early expression of sustainable construction practices and reuse.

We, the below signed residents and friends of Naval Station Treasure Island, petition the San Francisco City Planning Department, the Treasure Island Development Authority, and the Historic Preservation Commission to preserve the historic Navy Chapel in a manner similar to the Great White Mansions on Yerba Buena Island. The chapel has been a spiritual home to countless Navy personal, and a site for weddings by current residents of the Island and San Francisco. It holds a special place in the hearts of many. Preserving the chapel will retain a part of the history of naval presence in the bay area and will insure generations to come will enjoy the building.  *(Mark R. Connors, President, Good Neighbors of Treasure Island and Yerba Buena Island)*  [33.1]
2. Comments and Responses

6. Historic Resources

- As to buildings on TI that are now 50 years in age or older that were not studied in the 1997 inventory:

  1. Did the HRE conducted as a part of the environmental review for this DEIR evaluate the Treasure Island Chapel, which according to recent articles in the press has been a fixture on the island since 1943?

  2. Why is the Treasure Island Chapel not considered a historic resource for purposes of evaluating the impacts of the Proposed Project?

  3. Please include an evaluation of this potential historic resource. (Vedica Puri, President, Telegraph Hill Dwellers) [39.45]

3. It may be that the Navy’s survey of pre-1947 historic resources is sufficient for CEQA review. But it is not in compliance with the City’s higher standards for review of architectural/historic resources. Either the EIR needs to incorporate such a review - as it does for post-1947 buildings - or include as a condition that such a City-standard review will be conducted for pre-1947 buildings prior to their final disposition. (John Elberling, TIDA Board Member) [22.3]

When I looked at the historic section, I couldn’t find a church in the EIR. I couldn’t find a single mention of a Treasure Island Church, and I tried to understand this. The historic methodology was, the document relies on the Navy’s evaluation of historic resources for everything built before 1947, and just kind of includes that as if it’s a done deal. But as it notes, the Navy’s methodology is not the same as the City’s, that the City practices under our planning, you know, requirements and so on. And -- but it only applied those new standards to buildings built after 1947. So neatly, the Treasure Island Church, because it existed before 1947, just doesn’t get considered. It’s like it doesn’t exist. That the Navy did not identify it as a historic resource.

And in looking at all these issues, and public assembly and so on, I was really struck with the fact that that church, obviously, played an important role in the history of the island all through the era of World War II, the Korean war, the Vietnam war, when it was a very central focus of community for the military personnel, who are certainly a part of the history of Treasure Island in San Francisco. And I really find its omission inexplicable in my mind.

So I just wanted it noted, that the Navy’s assessment cannot be relied on as satisfactory for our local approval process. We have our own standards and they should be applied to the pre-1947 buildings as well as the post-1947 buildings. And perhaps that can help solve, at least, part of the problem that I referred to earlier. (John Elberling, TIDA) [TR.23.8]

Response

Although the EIR finds that the chapel does not qualify as a historic resource for CEQA purposes, as more specifically described below, the Treasure Island Development Authority (“TIDA”) and Treasure Island Community Development, LLC (“TICD”) recognize that there is public concern regarding the possible removal of the Chapel. In response to public concern, TIDA and TICD have revised the Proposed Project to retain the Chapel in its current location and incorporate it within the proposed Cultural Park open space. Revisions to the EIR to reflect this change are described below, following a discussion of the historic resource evaluation.
As discussed in EIR Section IV.D, Cultural and Paleontological Resources, on p. IV.D.20, in 1997, the Navy completed a comprehensive survey and evaluation of Naval Station Treasure Island (“NSTI”) resources on Treasure Island and Yerba Buena Island, as part of Section 106 compliance for the transfer of Navy property out of Federal ownership (the “1997 Inventory and Evaluation”). The 1997 Inventory and Evaluation evaluated the Chapel (Building 194, built in 1943) and found that the building does not qualify for listing in the National Register:

Although a handsome building, the Treasure Island chapel does not appear to be a significant example of its type, whether considered in the context of Navy chapels, churches from the 1940s, or even in the more limited context of military chapels from World War II. The Navy has a long tradition of building excellent chapels; dozens of Navy-built chapels have been listed in the National Register. Many of these chapels were designed by private architects, including many of the nation’s best-known firms. Within this context, the Treasure Island chapel does not appear to represent a significant example. It is not the work of a master designer; very little is known of the firm of Blanchard and Maher, architects for the building. Neither is the building significant as an example of ecclesiastical design from the era, whether civilian or military in origin. Many military chapels from World War II were temporary in design; a chapel was included among the standardized plan sets used in cantonment design. Not uncommonly however, chapels were among the key buildings treated to a custom design, in recognition of the importance of the building. There are many noteworthy World War II-era chapels still in existence, including the Navy-designed chapel at the Naval Air Station in Alameda, which has been determined eligible for listing in the National Register as a contributing element to a historic district. Although a handsome and largely unmodified building, the chapel at Naval Station Treasure Island does not appear to qualify for listing in the National Register.

For similar reasons, the Chapel is likewise not eligible for inclusion in the California Register of Historical Resources (“CRHR”) under CRHR Criterion 3 (Design/Construction). It does not “embody the distinctive characteristics of a type, period, or method of construction, or represent the work of an important creative individual, or possess high artistic values.”

Although associated with World War II, the most significant historical event of the 20th century, which also had a transformative effect on California history, research has not uncovered any evidence that this resource played a sufficiently significant or central role in any of the decisive, transformative, or cataclysmic events of World War II that could justify inclusion of the Chapel in the National Register of Historic Places (“NRHP”) or California Register of Historical Resources based on NRHP Criterion A (Events) and the corresponding CRHR Criterion 1 (Events).

1 United States Department of the Navy, Cultural Resources Inventory and Evaluation Investigations, prepared by JRP Historical Consulting Services, January 1997.
2 1997 Inventory and Evaluation, p. 3-25.
Since its construction, the Chapel has been the site of numerous rites of passage marking important life events (e.g., christenings, weddings, and funerals). The use of the Chapel for these purposes, however does not establish a sufficient association with important events or persons in United States or California history to justify its inclusion in the National Register of Historic Places or California Register of Historical Resources based on NRHP Criterion B (Persons) and the corresponding CRHR Criterion 2 (Persons).

The Chapel dates from a relatively recent historic era that is well documented in the historic record. Study of its physical characteristics, features, and materials is therefore unlikely to yield any important information of broad scientific or historical interest that is not already readily available in the documentary record. For this reason, the Chapel is not eligible for listing in the National Register of Historic Places or California Register of Historical Resources based on NRHP Criterion D (Information Potential) and the corresponding CRHR Criterion 4 (Information Potential).

No new information about the historic or architectural significance of the Chapel has surfaced since preparation of the 1997 Inventory and Evaluation that would call for revisiting its analysis and conclusions regarding the Chapel. As such, the EIR for the Proposed Project continues to rely on the analyses and conclusions of the 1997 Inventory and Evaluation. Demolition of the Chapel would not result in a significant impact on an historical resource under CEQA.

Nevertheless, in effort to respond to public comments, TIDA and TICD have revised the Proposed Project to retain the Chapel in its current location, and incorporate it within the proposed Cultural Park open space, as stated above. The EIR Summary Chapter, Chapter II, Project Description, Section IV.A, Land Use and Land Use Planning, and Section IV.J, Recreation, are revised to reflect the retention of the Chapel as follows (deleted text is shown in strikeout and new text is underlined):

The first full paragraph on EIR p. S.56 is revised as follows:

Under the No Ferry Service Alternative, up to 5,100 residential units would be constructed, 2,900 fewer than with the Proposed Project. While the same amount of retail space would be developed, there would also be less neighborhood-serving retail than in the Proposed Project. Residential parking would also be reduced to about 8,255 parking spaces. Most other land uses would be the same as with the Proposed Project: 100,000 sq. ft. of office space; 500 hotel rooms, including 50 on Yerba Buena Island; adaptive reuse of about 311,000 sq. ft. of Buildings 1, 2, and 3 with retail, light industrial/food production, and entertainment uses; landside facilities to support the approved expanded Clipper Cove Marina; retention and continued use of the existing chapel for general assembly and non-denominational religious activities; new landside and waterside launch facilities at the existing sailing center on Treasure Island Sailing Center; and reuse or reconstruction of the existing Treasure Island elementary school at its current location.
The third sentence of the first full paragraph on EIR p. II.9 is revised as follows:

Current non-residential uses include offices, a small restaurant, a convenience store, several event venues, a guard shack, warehouse/storage/manufacturing facilities, a childcare center, a fire station and fire training academy, a wastewater treatment plant, a gymnasium, film production facilities, a chapel, and a yacht club.

The following new bulleted item is added to the listing under the heading “E. Development Plan Characteristics” on EIR p. II.16, to follow the sixth item (“Rehabilitation of the historic buildings on Yerba Buena Island”):

- Retention and continued use of the existing chapel in its existing location for general assembly and non-denominational religious activities;

The first paragraph under the heading “Island Center District” on EIR p. II.21 is revised as follows:

The Island Center District would occupy the southern portion of Treasure Island and would abut the southern/southeastern boundary of the Jobs Corps campus. This new neighborhood would include a dense mix of retail, restaurant, office, hotel, residential, transit, and community services uses. The Ferry Terminal and intermodal Transit Hub would be located in the Island Center at the southwestern shore of Treasure Island. A pedestrian link is planned between the Ferry Terminal and Clipper Cove, with pedestrian paths around and connecting to corridors through Buildings 1, 2 and 3, the historic structures (see Figure II.10: Proposed Street System, p. II.41). Buildings 1, 2, and 3 would be adaptively reused for commercial and recreation/entertainment uses. As part of the adaptive reuse, Building 111, which is an addition to Building 3, would be demolished. The existing chapel would be retained in its current location and used for general assembly and non-denominational religious activities.

The last bulleted item on EIR p. II.31 is revised as follows:

- A 3-acre Cultural Park adjacent to Building 1. The park would include a future building site for a cultural institution, such as a museum, of up to 75,000 sq. ft. The existing chapel would be retained in its current location.

The paragraph under the heading “Institutional and Public Services” on EIR p. II.33 is revised as follows:

The Development Program would provide space for a variety of community programs in the historic former Administration Building (Building 1), in some of the proposed residential buildings, and in a new 35,000-sq.-ft. building near Pier 1 expected to provide space for recreational or interpretive center activities. Space for public offices, such as TIDA, and childcare also would be provided. Space for an up to 75,000-sq.-ft. museum or other cultural institution is planned in the Cultural Park north of Building 1. The existing chapel, on the site of the proposed Cultural Park, would be retained in its current location and used for general assembly and non-denominational religious activities. The existing public grammar school on Treasure Island, now closed, would be improved or rebuilt as a K-8 public school in coordination with the San Francisco Unified School District. The existing wastewater treatment plant would be replaced by the SFPUC (as
discussed below in “Proposed Utilities”). A recycling program would be established, and a recycling center/corporation yard would be provided. A joint police/fire station would be provided on Treasure Island. The existing Job Corps facility would remain in use in its current location on Treasure Island, under the jurisdiction of the U.S. Department of Labor.

The fifth and seventh bulleted items under the heading “Phase 4 (Building Construction and Associated Infrastructure)” on EIR p. II.82 are revised as follows (the sixth bulleted item is shown for context):

- Development of the Cultural Park and museum around the existing Navy chapel, which would be retained;
- Renovation of Building 3 on Treasure Island;
- Development of the Senior Officers’ Quarters Historic District and landscaping improvements on Yerba Buena Island;

The paragraph under the heading “Community and Institutional Uses” on EIR p. IV.A.8 is revised as follows:

Community and institutional uses on Treasure Island include educational, religious, public service, and public works facilities. Educational facilities consist of a former elementary school, a portion of which is occupied by the Glide Foundation’s YouthBuild Program, the San Francisco Sheriff’s Five Keys Charter School, and the San Francisco Police Department’s motorcycle training unit. Other educational facilities include the Life Learning Academy, the Treasure Island Clubhouse of the Boys and Girls Clubs of San Francisco, and a child development center. There is an existing chapel on the north side of California Avenue, in the southwest quadrant of the island. Public service facilities include a fire station, fire training academy, a police station, and a post office. The educational and public service facilities are concentrated in the interior of the island in the northwest quadrant. Existing public works facilities include two emergency power generators, steam plant substations, a wastewater treatment plant, and one water storage tank for both domestic and firefighting use.

The second paragraph on EIR p. IV.A.15 is revised as follows:

The Proposed Project, which includes Treasure Island and Yerba Buena Island, consists of a total of up to 8,000 dwelling units, up to 140,000 sq. ft. of new commercial retail space, up to 100,000 sq. ft. of new office space, and up to 500 hotel rooms (see Table IV.A.2). Buildings 1, 2, and 3 on Treasure Island would be rehabilitated and converted to approximately 311,000 sq. ft. of commercial, retail, entertainment, and community services space. The existing chapel would be retained in its current location and continue to be used for general assembly and non-denominational religious activities. In addition, the Proposed Project would include approximately 300 acres of open space in the form of athletic fields, bicycle and pedestrian paths, parks, playgrounds, plazas, shoreline trails, stormwater wetlands, an approximately 20-acre Urban Agricultural Park, and wildlife habitat. Approximately 220 acres of open space would be on Treasure Island, and the remaining 80 acres would be on Yerba Buena Island.
The sixth sentence of the first paragraph under Impact LU-3 on EIR p. IV.A.24 is revised as follows:

Existing buildings to be retained and reused as part of the Proposed Project include Historic Buildings 1, 2, and 3 and the existing chapel would be retained and adaptively reused as part of the Proposed Project, thus maintaining some of the existing land use character of the vicinity.

Figure IV.B.10: Proposed Representative Massing Diagram, on p. IV.B.20, is amended by showing the retention of the chapel. The revised figure is shown on the following page.

Item No. 9 in Table IV.J.1: Proposed Parks and Open Space, on EIR p. IV.J.13, is revised as follows:

**(Revised) Table IV.J.1: Proposed Parks and Open Space**

<table>
<thead>
<tr>
<th>Parks and Open Space</th>
<th>Description of Use</th>
<th>Acres (approximate)*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Treasure Island</td>
<td>Plaza designed to connect the Cityside District with the Transit Hub and Clipper Cove; includes potential site for a museum or other cultural institution and the existing chapel, which would be retained</td>
<td>3</td>
</tr>
</tbody>
</table>

The first paragraph under Impact RE-1 on EIR pp. IV.J.16-IV.J.17, is revised as follows:

Development of the parks and recreational facilities would require construction activities, which could vary depending on the location and type of work. Existing structures on identified park sites would require demolition, except for the existing chapel on the site of the proposed Cultural Park. The chapel would be retained in its current location. Sites would be cleared and graded, and utilities (electrical, water, sanitary sewer, and storm drainage), hardscape (e.g., concrete, asphalt, stone, walls, sport-court and play area surfacing, decking/boardwalks), and site furnishings (e.g., benches, picnic tables, drinking fountains, play equipment, fencing, artwork, lighting) would be installed. New structures (e.g., restrooms, picnic/shade shelters, kiosks, pavilions, overlooks, piers) would be constructed or existing structures would be renovated. If sites are proposed to include cultural or educational institutions or other buildings, such as a museum or an environmental education center, developable pads would be constructed. Site planting would include installation of irrigation systems and would focus on re-vegetation and restoration of native plant communities, where possible. The natural open space on Yerba Buena Island would be managed under a Habitat Management Plan (“HMP”), and construction activities in these areas would generally be limited to those for revegetation, creation of trails, removal of invasive species, and other low-impact activities.

Figure IV.N.2: Areas of Proposed Geotechnical Improvements, on p. IV.N.26, is amended by showing the retention of the chapel, designating the area around the chapel as an area not proposed for densification, and indicating that vibration control methods of densification would be used around the chapel. The revised figure is shown on p. 2.6.10.
PERIMETER GEOTECHNICAL IMPROVEMENTS AS - NEEDED

DEVELOPED AREAS TO BE DENSIFIED

CAUSEWAY GEOTECHNICAL IMPROVEMENTS AS - NEEDED

VIBRATION CONTROL METHODS OF DENSIFICATION TO BE USED NEAR EXISTING STRUCTURES

AREAS NOT PROPOSED FOR DENSIFICATION

SOURCE: CMG, ENGEO
2.6.3 IMPACT ON BUILDINGS 1, 2, AND 3

Comments

3. Mitigation measures referencing TIDA review seem inadequate. Shouldn’t the process of review and what it should consider be stated in the mitigation? At a minimum, review for compliance with the Secretary’s Standards should be referred to the city’s Historic Preservation Commission for its recommendations. The consultation process would be formalized by an agreement between TIDA and the City of San Francisco. (Hisashi Sugaya) [21.3]

An objective look at the photo views contained in the DEIR conclusively shows that the new buildings constructed in the vicinity of the historic buildings on TI would effectively bury Buildings 2 & 3 behind the proposed new high-rise buildings, and that Building 1 would be obscured and dwarfed by the tallest buildings on the Island. These scenic resources would thus be significantly altered. The statement contained in the DEIR that the tallest building on TI, a 650-foot tall tower rising behind Building 1 would “reinforce the centrality of Building 1” is a desperate attempt to avoid a finding of significant impact that simply does not work by any objective standard. The only conclusion that can be reached is that the proposed new construction on TI would significantly alter existing features considered scenic resources, and would alter the visual character and visual quality of these scenic resources. Further comments regarding these impacts are contained in the comments under Historic Resources, below. (Vedica Puri, President, Telegraph Hill Dwellers) [39.37]

Impact CP-5: The DEIR concludes that impacts upon historical resources from their reuse and rehabilitation under the proposed Redevelopment Plan would be “Less than Significant.”

We disagree and do not understand the basis for this conclusion given that the DEIR states, as to the three most significant National Register-listed buildings:

“The specific nature and scope of such alterations have not been determined at this time but may include rehabilitation of the interior, rehabilitation of the exterior, and the addition of features (such as photovoltaic panels on Buildings 1, 2 and/or 3)” and that the rehabilitation of these buildings “may also include building additions.”

The DEIR further states that the Design for Development “establishes zones in which additions occur and the maximum height for the potential additions.”

- Please include in your response to comments a copy of the referenced portions of the Design for Development that establishes these zones in which additions occur and the maximum height for the potential additions to Buildings 1, 2 and 3. Please provide illustrations of the application of these zones and maximum heights as they would apply to each of the National Register listed buildings (Vedica Puri, President, Telegraph Hill Dwellers) [39.49]

- Does the Design for Development establish similar zones and maximum heights for other historic resources on TI and YBI? If so, please include a copy of the referenced portions of the Design for Development and provide illustrations of the application of such zones and heights to these other historic resources. (Vedica Puri, President, Telegraph Hill Dwellers) [39.50]

- Because the nature and scope of the alterations is unknown, there is no adequate basis for the DEIR conclusion that the impacts of future projects to alter historic buildings will have a “Less than Significant” impact. The DEIR improperly relies on TIDA to review the proposed
treatments to historic resources and to determine if the proposed work conforms to the Secretary of the Interior’s Standards. A future review of an unknown project by a non-expert body is an inadequate basis for the DEIR’s conclusion. Please respond to the each of the following questions:

(1) How will review by TIDA be adequate to assure that historic resources will not be impacted by future rehabilitation projects?
(2) Are members of the TIDA Board or its staff required to be trained and experienced experts in the field of historic preservation?
(3) What public notice and process will be required as to each project that would alter or demolish a historic resource?
(4) Did the DEIR consider other more effective ways to mitigate the potentially significant impacts on historic resources, such as requiring project-specific EIRs for each project that proposes to alter a historic property, and requiring review by the City’s Historic Preservation Commission of each such project? Why are these not included in the DEIR? Future project-specific environmental review and review by an expert body within a public review process is the only way these impacts could be adequately mitigated.

- The DEIR contains a general statement that “Buildings 1, 2, and 3 would be rehabilitated and converted to approximately 311,000 sq. ft. of commercial, retail, entertainment, and community services space.” Please respond to the following questions:

(1) How many square feet does each building contain now?
(2) What use is being proposed for each building?
(3) How will the proposed new use impact the interior and exterior of each building?
(4) Are additions planned for each building? How many square feet would be added to each building? (Vedica Puri, President, Telegraph Hill Dwellers) [39.51]

Impact CP-6: The DEIR concludes that proposed alterations to the contributing landscape areas of Buildings 1, 2, and 3 would be “Less than Significant with Mitigation.”

The DEIR reveals that the current plan for landscapes around Building 1 would remove character defining retaining walls and alteration of the driveways west of Building 1 causing:

“a substantial change in the significance of an historic resource, although it is not possible to foresee the ultimate impact from the current concept-level design for the landscape.”

The DEIR further discloses that: “Alterations to the contributing landscapes could result in a significant adverse impact on the individual historic significance of Building 1.”

- Because the nature and scope of the alterations to contributing landscapes is unknown, there is no adequate basis for the DEIR conclusion that this identified “significant impact” be mitigated to “less than significant.” Again, the DEIR improperly relies on a future review by TIDA to review proposed alterations to (and within) the contributing landscape areas to determine if the alterations conform to the Secretary of the Interior’s Standards.

A future review of an unknown project by a non-expert body is an inadequate mitigation measure (M-CP-6). Please respond to the each of the following questions:

(1) Why did the DEIR not consider a Mitigation Measure that would simply require an amendment to the Design for Development requiring that no project shall remove any character defining features of any contributing landscape? The obvious Mitigation Measure is to require that the contributing landscapes be preserved in intact.
(2) How would review by TIDA assure that historic landscapes and resources would not be impacted by future projects?
(3) How would the proposed mitigation measure be enforced and who will enforce it?
(4) Are members of the TIDA Board or staff required to be experienced and trained experts in the field of historic preservation and historic landscapes?
(5) What public notice and process will be required as to each project that proposes to alter or demolish a historic resource or its contributing landscape?
(6) Did the DEIR consider other ways to mitigate the potentially significant impacts on historic resources and their contributing landscapes, such as requiring project-specific EIRs for each project that proposes to alter a historic property, and requiring review by the City’s Historic Preservation Commission of each such project? Future project-specific environmental review and review by an expert body within a public review process is the only way these impacts could be adequately mitigated.

Impact CP-7: The DEIR concludes that proposed new construction within the contributing landscapes of Buildings 1, 2, and 3 would be “Less than Significant with Mitigation.”

Remarkably, the DEIR reveals that the current Design for Development allows new freestanding construction within the contributing landscapes of the National Register listed buildings 1, 2 and 3. How could this impact possibly be mitigated? The DEIR states, once again, that: “the specific design of these new features has not been developed enough at this time to assess their impact.”

And again, the DEIR recommends as a Mitigation Measure (M-CP-7) a future review by TIDA, which would apply the Secretary’s Standards. Based on the fact that the DEIR states that there will be construction of buildings within the contributing landscapes, the Proposed Project would clearly cause a significant impact to these cultural landscapes that could not be adequately mitigated. Please respond to the following comments:

(1) Why did the DEIR not consider a Mitigation Measure that would simply require an amendment to the Design for Development prohibiting any construction of new buildings within the contributing landscapes of Buildings 1, 2 and 3? The obvious Mitigation Measure is to require that the contributing landscapes be preserved in intact and that no buildings be placed within them. Please explain why this would not be the most appropriate approach under CEQA?
(2) Again, the fact disclosed in the DEIR that the “specific design of these new features has not been developed enough at this time to assess their impact” is clear evidence that any such project within the contributing landscapes would require a later project specific EIR. Please explain why this would not be the most appropriate approach under CEQA?
(3) Please respond to all of comments (2) though (5) under Impact CP-6, above, pertaining to review by TIDA. (Vedica Puri, President, Telegraph Hill Dwellers) [39.52]

Impact CP-11: The DEIR concludes that the construction of new buildings in the vicinity of Buildings 1, 2 and 3 would not impair the significance of these historical resources. We completely disagree with this conclusion. A quick look at Figures IV.B.7 (View Point F) and IV.B.8 (View Point G) prove our point visually.

- The first sentence of this discussion states that new buildings are proposed outside of the contributing landscapes sites of Buildings 1, 2 and 3. This directly conflicts with the discussion under Impact CP-7, which specifically addresses the impacts of proposed new
construction within the contributing landscapes of these historic buildings. Please explain this inconsistency between Impact CP-7 and CP-11.

- Figure IV.D.6 is very hard to read and does not provide adequate information. Please add the following to this Figure:
  (1) A key to the colors and patterns used.
  (2) The heights of the three National Register buildings (1, 2 and 3). The lack of this information makes it difficult to compare the heights of the proposed new buildings in the immediate vicinity of the historic buildings.
  (3) The street names.
  (4) All proposed new buildings on the nearby and surrounding blocks – particularly all the proposed new buildings north of the historic buildings should be shown – including the heights of each of them.

- The height differences between the historic buildings and the proposed new buildings are extreme. Please list the heights of each historic building on TI and YBI and compare them to the heights of all proposed new buildings on TI and YBI.

- It appears that Buildings 2 and 3 will be completely hidden from all vantage points off the island. Please provide visual simulations showing these views.

- It appears that Building 1 will be dwarfed and overwhelmed by the buildings surrounding it, including the tallest building proposed on TI, and when viewing Building 1 it will be with the backdrop of the tallest buildings on the Island. Please provide visual simulations showing these views from Telegraph Hill and along the NE Waterfront at night and day. What color will the proposed new buildings be?

The determination of the DEIR that new buildings in the vicinity of Buildings 1, 2 and 3 would not impair the significance of these historical resources is a subjective judgment regarding the relationship of the small scale historic buildings to the adjacent high rise towers – between Buildings 1 and 2 are two towers of 450 feet and 240 feet, and immediately to the north of Buildings 1, 2 and 3 are the tallest buildings on TI, one proposed at 650 feet. (Vedica Puri, President, Telegraph Hill Dwellers) [39.55]

- Please include in the DEIR an objective visual presentation of the transitions between the proposed new buildings and the small scale historic buildings. What materials and colors are anticipated for the new construction? (Vedica Puri, President, Telegraph Hill Dwellers) [39.56]

- Please include in the DEIR an impartial discussion of how the proposed new buildings would comply with each of the following objectives from the San Francisco General Plan:
  
  “Promote harmony in the visual relationships and transitions between new and older buildings” [General Plan Objective 3, Policy 3.1]

  Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development. [General Plan Objective 3, Policy 3.4]

  Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction. [General Plan Objective 3, Policy 3.6]

  Design new buildings to respect the character of older development nearby. [General Plan Objective 12, Policy 12.3]
Include a discussion of how the Proposed Project would “promote harmony in the visual relationships and transitions” between the proposed new buildings and the historic building on TI, including Buildings 1, 2 and 3.

Include a discussion of how the Proposed Project would relate the height of the new buildings to the height and character of the historic building on TI, including Buildings 1, 2 and 3.

Include a discussion of how the design of the proposed new buildings would respect the scale and character of the nearby historic building on TI, including Buildings 1, 2 and 3.

Based on the objectives listed above, discuss the Proposed Project could impair the significance of the National Register buildings on TI as visual and aesthetic resources?

Please discuss how the construction of two new towers between Buildings 1 and 2 (of 450 feet and 240 feet) and a 650 foot high rise immediately north of these low rise historic buildings would be consistent with any of the General Plan policies listed above.

Please include a detailed objective discussion of how the new construction described in the DEIR could alter the integrity of the setting, feeling and association of Buildings 1, 2 and 3.

We agree with the statement in the DEIR that “the new buildings would alter the existing visual, urban, and architectural context of Buildings 1, 2 and 3.” However, we completely disagree with the DEIR’s conclusion that this is not an impact because: “the historic character of this surrounding context has already been altered with the Navy’s occupation of the CCIE site, and later with the Navy’s own demolition and new construction.” Alterations by the Navy were small in scale and did not alter the visual and architectural context of the National Register buildings to a significant degree. The proposed new construction will destroy all remaining visual and architectural context. Please discuss this issue further in the DEIR. (Vedica Puri, President, Telegraph Hill Dwellers) [39.57]

Given this level of uncertainty and absence of accurate, stable and finite project descriptions, particularly as to historic resources and their contribution features, justify the adequacy of the DEIR’s recommended mitigation measures that rely on a future review of an unknown project by a non-expert body?

Why does the DEIR not recommend mitigation measures requiring project-specific EIRs for each individual project that proposes to alter a historic property?

Why does the DEIR not recommend mitigation measures requiring project-specific review of each individual project that proposes to alter a historic property by the City’s Historic Preservation Commission?

Why isn’t a future project-specific environmental review and review by an expert body within a public review process the best way to adequately mitigate these yet unknown potentially significant impacts? (Vedica Puri, President, Telegraph Hill Dwellers) [39.79]

Response

Some comments express general disagreement with the conclusions of the EIR regarding the impact of proposed new construction on Buildings 1, 2, and 3. Potential impacts related to proposed alterations to the contributing landscapes of Buildings 1, 2, and 3 are analyzed and evaluated under Impact CP-6 on EIR pp. IV.D.53-IV.B.54. Potential impacts related to proposed new construction within the contributing landscapes of Buildings 1, 2, and 3 are analyzed and
evaluated under Impact CP-7 on EIR pp. IV.D.54 – IV.D.55. Potential impacts related to proposed new construction outside of the contributing landscapes of Buildings 1, 2, and 3 are analyzed and evaluated under Impact CP-11 on EIR pp. IV.D.58 – IV.D.60. The analysis set forth in the EIR is based on historic resource surveys and investigations performed by experts qualified to perform such analysis.

As discussed in EIR Section IV.D, Cultural and Paleontological Resources, on EIR pp. IV.D.51-IV.D.52, CEQA defines a significant impact on an historical resource.

*CEQA Guidelines* (Section 15064.5(b)) establish the criteria for assessing a significant environmental impact on historical resources. They state, “[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.” The *CEQA Guidelines* define “substantial adverse change in the significance of an historical resource” as a “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” (Section 15064.5(b)(1)). The significance of an historic architectural resource is considered to be “materially impaired” when a project demolishes or materially alters the physical characteristics that justify the inclusion of the resource in the CRHR, or that justify the inclusion of the resource in a local register, or that justify its eligibility for inclusion in the CRHR as determined by the lead agency for the purposes of CEQA (Section 15064.5(b)(2)).

As discussed in EIR Section IV.B, Aesthetics, on pp. IV.B.23-IV.B.27, the implementation of the Proposed Project would result in substantial and transformative changes to the visual character of Treasure Island. Building 1 is about 80 feet tall from the top of its air traffic control tower. Buildings 2 and 3 are approximately 85 feet tall. Under the Proposed Project, a wide range of heights for new buildings is envisioned for Treasure Island from 40 feet to 650 feet, as discussed on EIR p. II.24 and shown in Figure II.6a on EIR p. II.25. Note, however, that the final update to the proposed *Design for Development* that will be considered by TIDA reduces the maximum proposed building height to 450 feet.

Comments request additional visual simulations from various locations (including Telegraph Hill and from the San Francisco waterfront) as presented in the EIR on pp. IV.B.5 - IV.B.14. An additional view from the San Francisco Waterfront on Pier 7 is presented in the response in Subsection 2.4.3, Viewpoints, in Section 2.4, Aesthetics, of this Comments and Responses document. New nighttime visual simulations are presented in the response in Subsection 2.4.4, Nighttime Views and Glare. Buildings 2 and 3 are not prominent from off-island locations, except when viewed from the Bay Bridge East Span (see Figure IV.B.7 on EIR p. IV.B.11), and the Causeway (See Figure IV.B.8 on EIR p. IV.B.13).

As discussed below and on EIR pp. IV.D.58-IV.D.60, Buildings 1, 2, and 3 are considered individual historic resources and do not together constitute an historic district; the setting of each
building is limited to the extant contributing landscape setting around each building. New construction outside of the identified boundaries of the contributing landscape setting of Buildings 1, 2, and 3 would not constitute a material impairment of an historical resource as defined by CEQA because the Proposed Project would not demolish or materially alter the physical characteristics of Buildings 1, 2, or 3 that justify their inclusion in the California Register of Historical Resources.

Buildings 1, 2, and 3 are each listed on the National Register of Historic Places as individual resources. For the purposes of determining how Buildings 1, 2, and 3 should be treated in the EIR’s analysis of impacts, (i.e., each as individual resources, and/or collectively as an historic district), the EIR evaluates the potential collective eligibility of all remaining landscape features and buildings of the Golden Gate International Exposition (“GGIE”) as a potential historic district under CRHR criteria (EIR pp. IV.D.39-IV.D.40). The EIR concludes that the remaining buildings and landscape features do not collectively constitute a coherent historic district and do not retain sufficient integrity to convey their collective significance as an historic district. For this reason, Buildings 1, 2, and 3 are each treated as individual resources for the purposes of evaluation of impacts under CEQA.

The contributing landscapes associated with Buildings 1, 2, and 3 under the National Register of Historic Places nomination are each described on EIR pp. IV.D.40-IV.D.47, and shown on Figure IV.D.3: Building 1 Contributing Landscape Areas, on EIR p. IV.D.43; Figure IV.D.4: Building 2 Contributing Landscape Areas, on EIR p. IV.D.45; and Figure IV.D.5: Building 3 Contributing Landscape Areas, on EIR p. IV.D.47.

The EIR and background Historic Resource Evaluation Report (“HRE”) study the associated contributing landscape setting of Buildings 1, 2, and 3. For each of these buildings, the EIR and HRE identify an extended boundary for the contributing landscape setting under CRHR criteria for the purposes of identifying and evaluating potential effects on individual Buildings 1, 2, and 3 under CEQA.

As part of, and for the purposes of, this EIR, the HRE studies each of the landscapes associated with Buildings 1, 2, and 3. Information on the landscapes associated with each building is based on a review of plans from the Exposition that show the landscape features at a schematic level, historical photographs, and historical aerial photographs. The HRE identifies, describes, and evaluates their significance and integrity. Based on closer study of these features than has been conducted in previous studies, the HRE identifies the particular landscape features that contribute, or do not contribute, to the significance of each building under CRHR criteria, and delineates a boundary for the contributing landscape features associated with each building. This boundary does not modify the existing NRHP site boundary for each building. Rather, it supplements those boundaries for the purposes of this EIR. (EIR p. IV.D.41)
As such, the physical characteristics that justify each building’s eligibility for inclusion in the California Register of Historical Resources are not premised on their existing visual or spatial relationship with each other, or any broader relationship with their wider surroundings. On this basis, the EIR concludes that new construction and alterations outside of the contributing landscape setting would not materially impair the physical characteristics that justify their individual eligibility for inclusion in the California Register of Historical Resources.

Comments raise concern about the visual character of new construction in the vicinity of Historic Buildings 1, 2, and 3 with respect to height, materials, and color and its impact on the significance of Buildings 1, 2, and 3. Specific building design details are not known at this time. As described in EIR Section IV.B, Aesthetics, on p. IV.B.25, as part of the Proposed Project, a Design for Development would be adopted and administered by TIDA. The Design for Development is a regulatory document that would establish design standards and guidelines that would direct future development of the Project Area. The Design for Development articulates the vision for the future visual character of the Project Area. It establishes specific requirements for buildings, streets, open spaces, and parking and loading to encourage high-quality design and materials, an inviting pedestrian orientation, and visual variety and interest while maintaining a cohesive visual identity for the Project Area. As noted on EIR p. IV.B.26, when specific building designs are proposed, TIDA would review them against the standards and guidelines provided in the Design for Development to ensure that they contribute visual interest, texture, and are consistent with the vision for the visual character and quality of the Project Area. The EIR analyzes impacts of new construction on historic resources on Treasure Island and concludes that implementation of approved design guidelines in the draft Design for Development would ensure that the Proposed Project would not cause a significant adverse impact on the visual quality of the Project Area, including Buildings 1, 2, and 3, and its surroundings.

The proposed Design for Development specifies height limitations for the blocks in the immediate vicinity of Buildings 1, 2, and 3. These height limitations are intended to limit the height and scale of new construction in the vicinity of Buildings 1, 2, and 3. The proposed height plan near Buildings 1, 2, and 3 is shown on the following page in (Revised) Figure IV.D.6: Height Plan Near Buildings 1, 2, and 3 (revisions to this figure include adding a legend designating existing and proposed building heights, and labeling surrounding streets). As discussed on EIR pp. IV.D.58-IV.D.59, on block B1: 20 feet (west of Building 1) and below the finish floor (east of Building 1); on block B1-A: 50 feet (east of Building 1); on block M1-A: 50, 70, and 450 feet (between Buildings 1 and 2); on block M1-B: 50, 85, and 240 feet (between Buildings 1 and 2); on block B2: 25 feet (north, west, and south of
SOURCE: TIDA

TREASURE ISLAND AND TERRA DUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISIED) FIGURE IV.D.6: HEIGHT PLAN NEAR BUILDINGS 1, 2, AND 3

2.6.19
Building 2; on block B2-A: 25 and 50 feet (south of Building 2); on block B3: 25 feet (west of Building 3); and on block B3-A: 25, 30, 50, and 125 feet (south of Building 3). The draft Design for Development requires a minimum 20-foot separation between new buildings and the historic buildings.

Buildings 1, 2, and 3 are individual resources, rather than part of an historic district. This proposed new construction would not be within the contributing sites of Buildings 1, 2, and 3, and would not have a physical effect on those historical resources. It would not alter, damage, or demolish them. The Secretary’s Standards apply to work carried out on historic properties; they are not applicable to properties that are not historic and are not within the site of an historic resource or within a historic district. The new construction described in the draft Design for Development would have the potential to alter the integrity of setting, feeling, and association of Buildings 1, 2, and 3, but it would not change their integrity of design, materials, workmanship, or location. The proposed new buildings in the vicinity of Buildings 1, 2, and 3 would not impair the physical characteristics that justify their eligibility for inclusion in the California Register. Although new buildings would alter the existing visual, urban, and architectural context of Buildings 1, 2, and 3, the historic character of this surrounding context has already been altered, first with the Navy’s occupation of the former GGIE site, and later with the Navy’s own demolition and new construction.

As discussed on EIR p. IV.B.23-IV.B.24,

New infill construction south of California Avenue in the vicinity of Buildings 1, 2, and 3 would not damage these visual resources of the built environment. Building 1 would continue to be a prominent visual presence, functioning as the visual centerpiece of Treasure Island. Buildings 2 and 3 would become less prominent when viewed from the causeway and from the Bay Bridge east span due to proposed new construction south of these buildings along Clipper Cove and proposed new infill construction west of Building 2. Buildings 2 and 3 would no longer occupy the water’s edge at Clipper Cove. The basic form of Buildings 2 and 3, defined by the wide arched span of their roofs, and architectural features such as the distinctive corner pylons and upper fenestration would continue to be prominent, rising from beyond the proposed new buildings along Clipper Cove.

Likewise, for these reasons, new construction outside of the contributing landscapes of Buildings 1, 2, and 3 would not impair the integrity of setting, feeling, and association of Buildings 1, 2, and 3.
Proposed new development north of California Avenue would not be subject to any special requirements for compatibility with Buildings 1, 2, and 3. Although the specific designs of new buildings on Treasure Island are not yet determined, implementation of the proposed Design for Development would likely result in new buildings that would contrast with the visual and historic character of Buildings 1, 2, and 3 (in terms of height, orientation, materials, color, texture, fenestration, articulation). This differentiation between old and new is intended to emphasize, through contrast, the historic architectural character of Buildings 1, 2, and 3 and enhance their visual prominence within their proposed new visual setting.

With respect to alterations and construction within the contributing landscapes of Buildings 1, 2, and 3, a comment suggests a mitigation measure that would require retention of all contributing features, and prohibition of all new construction and additions within the contributing landscape areas. Although such a measure would be one way to ensure that the existing setting would be preserved, such a measure would be unnecessarily restrictive and is not required to ensure that this potential impact would be mitigated to a less-than-significant level under CEQA. The regulatory program established by the draft Design for Development (p. 293) relies on the following statement in CEQA Guidelines Section 15064.5(b)(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…shall be considered as mitigated to a level of less than a significant impact on the historic resource.”

Conformity with the Secretary’s Standards, as called for by the regulatory program established by the draft Design for Development, and also by Mitigation Measure M-CP-7 on EIR p. IV.D.55, which requires review of new construction within the Contributing Landscape west of Building 1 under the Secretary’s Standards, would ensure that the potential impacts on historic architectural resources resulting from alterations and additions associated with rehabilitation and reuse of Buildings 1, 2, and 3, would be less than significant.

Comments express concern about the process by which TIDA would review designs for alterations and additions to historic architectural resources and new construction within their landscape setting under the Secretary’s Standards, and suggest that a mitigation measure require review of alterations by the City’s Historic Preservation Commission and/or require project-specific environmental review for future alterations to Buildings 1, 2, and 3 and their associated contributing landscape. The Design for Development establishes regulatory standards and a
regulatory procedure for review of alterations to historic architectural resources and new construction within contributing sites of historic architectural resources:³

TIDA has exclusive jurisdiction over design review of proposed treatment to historic resources identified on Treasure Island and Yerba Buena Island. Chapters T5 and Y5 of this Design for Development sets forth requirements for design related to historic resources, including requirements that rehabilitation of resources listed on the National Register of Historic Places comply with the Secretary of the Interior’s Standards for Rehabilitation. TIDA shall conduct review to ensure that any alterations to historic resources on Treasure Island or Yerba Buena Island, or new construction within the contributing sites of such historic resources, as is defined in Chapters T5 and Y5 of this Design for Development, comply with the Standards and Guidelines of that Section. TIDA’s review will be carried out in accordance with the DRDAP [Document Review and Design Approval Process], which shall include special protocol for the review of historic resources. Alterations to Historic Resources undertaken directly by TIDA that are not otherwise subject to the DRDAP process shall also follow the historic resource review protocol described in the DRDAP.

One comment asks whether members of the TIDA Board and its staff are required to be experts in the field of historic preservation. Members of the TIDA Board and its staff are not required to be preservation experts. However, the proposed Design for Development and Design Review and Document Approval Procedure (DRDAP) require for all historic resources identified in the proposed Design for Development (including Buildings 1, 2, and 3), that TIDA consult with a qualified professional preservation architect, planner, architectural historian or other professional experienced in the application of the Secretary’s Standards for Rehabilitation to adaptive reuse projects, on a proposed project’s compliance with the Secretary’s Standards, where the project involves the rehabilitation and reuse of Buildings 1, 2, and 3.⁴ The proposed DRDAP also sets forth the process that would be required for all design approvals, including those involving historic resources. This would ensure that review of proposals for alterations to historic resources is informed by appropriate preservation expertise. Review by the Historic Preservation Commission is not necessary. If TIDA’s review and preservation consultation under the regulatory program established by the proposed Design for Development indicate by substantial evidence that a future specific design for alteration or addition does not conform to the Secretary Standards, such a proposal would require additional project-specific environmental review under CEQA at the appropriate level of CEQA documentation (e.g., Addendum, Supplemental or Subsequent EIR, Initial Study/Negative Declaration/Addendum). If review indicates conformity with the Secretary’s Standards, no significant impact would result and no further environmental impact would be necessary.

⁴ Disposition and Development Agreement, Design Review and Document Approval Procedure, Draft, January 13, 2011, Sections 7.2.4 and 7.3.4.
Comments request an analysis of how new construction in the vicinity of Buildings 1, 2, and 3 would conform to the urban design policies of the San Francisco General Plan. As discussed on EIR p. IV.B.15:

As discussed in Chapter III, Plans and Policies, “San Francisco Plans and Policies,” p. III.1, although Treasure Island and Yerba Buena Island are located within the jurisdictional boundaries of the City and County of San Francisco, they are not included in the San Francisco General Plan (General Plan) and its related planning and policy documents, or in the San Francisco Planning Code (Planning Code).

As discussed in Chapter II, Project Description, “Proposed General Plan and Planning Code Amendments,” p. II.34, the Area Plan, SUD, and Design for Development documents would establish the land use controls and design standards for the Proposed Project. The Proposed Project includes amendments to the text and maps of the General Plan and Planning Code that would identify the geographic and physical boundaries of Treasure Island and Yerba Buena Island, and incorporate the land use controls and design standards specified in the Area Plan, SUD, and Design for Development.

As EIR Chapter III, Plans and Policies, states on p. III.2, the decision-makers will consider whether the Proposed Project is consistent with the goals, policies, and objectives in the General Plan as part of the approval process. This process is distinct from the evaluation of environmental impacts under CEQA. Plan consistency issues are relevant to the CEQA analysis to the extent those issues implicate significant environmental effects. In this case, as explained in the EIR and above, policies concerning the visual relationship of a transition between the Proposed Project and Buildings 1, 2, and 3 are policy issues that will be considered by decision-makers. If the EIR is certified, the decision-makers will also be required to consider and adopt General Plan consistency findings in connection with approval of the Proposed Project.

2.6.4 BUILDING 111

Comments

1. Impact CP-8. The reasoning that “Building 111 does not significantly contribute to the historic character of Building 3” and “Building 111 was included in the NRHP nomination because of its age, not because it was considered an integral feature of Building 3” and “Constructed with less-refined materials, this feature was an addition intended to serve a temporary function as a firehouse during the GGIE” are all flawed.

Why does 111 have to contribute to the historic character of Building 3 in order to have historic significance? Since it was constructed separately as a firehouse, was “completed by the time GGIE opened,” served as the firehouse during the exposition and is still extant today argues for its historic significance separate and apart from it being attached to Building 3. The two buildings functioned separately. It isn’t as though 111 was an addition to Building 3 intending to serve some use supporting those in the larger building. 111 was built as a firehouse and it only happens to be attached to Building 3.
Chapter IX

2. Comments and Responses

6. Historic Resources

You must evaluate Building 111 as its own entity, not as an “integral feature of Building 3.” Of course, it is not such a feature. It was never intended to be that; it is a separate building.

Whether it was constructed “with less-refined materials” is irrelevant. It was a utilitarian building not intended to be of the scale of Building 3 let alone be an addition with architectural details and materials of the Building 3.

Whether Building 3 was to “serve a temporary function as a firehouse during the GGIE” really doesn’t matter. It survived and currently stands. One would think a building, temporary or not, that served as a firehouse for the exposition and which still remains would be considered a historic resource. Using this line of thinking, the remaining earthquake shacks in San Francisco would not have historic significance since they were temporary housing (and also not well constructed). (Hisashi Sugaya) [21.1]

Section D.2 on Historic Architectural Resources is confusing and raises many questions and concerns, especially as to the apparent “opinion shopping” regarding the impacts to Building 3. (Vedica Puri, President, Telegraph Hill Dwellers) [39.42]

Impact CP-8: The DEIR concludes that the demolition of Building 111 would not be a significant impact on this historic resource. This conclusion is obviously based entirely on “opinion shopping” by the project sponsor to get the result desired. The impact on Building 3 of the demolition of Building 111 is significant and can only be avoided by changing the Proposed Project to avoid its demolition.

- Confirm that Building 3 (including Building 111 as a contributing feature) is listed on the National Register of Historic Places.
- Confirm that the HRE determined that the demolition of Building 111 would result in a significant adverse impact on the significance of Building 3 as a historic resource.
- Confirm that the Planning Department’s Preservation Planner initially agreed with the HRE’s conclusion.
- Please explain why Page & Turnbull was hired to “provide additional information about Building 111” in contradiction to the HRE consultant’s conclusion?
- Was Page & Turnbull hired by the environmental consultant, the Planning Department, or by the project sponsor?
- Why does the preparer of this DEIR use this “additional information” to reach the opposite conclusion from that contained in the HRE?
- Does this “additional information” contradict the National Register listing?
- The DEIR fails to reveal on page IV.D.25, in the 4th paragraph, that the project sponsor hired Page & Turnbull to come up with some “findings” to contradict the HRE and National Register listing for Building 3 in order to justify the demolition of a portion of the historic resource.
- Why couldn’t the project be changed to avoid the demolition of this historic resource?
- The DEIR reveals that Page & Turnbull was hired by the project sponsor to avoid a finding that the Proposed Project would cause a Substantial Adverse Impact on a National Register property that could not be mitigated. We disagree with the DEIR’s conclusion that a second opinion, which contradicts the HRE and the National Register listing, constitutes “substantial evidence in light of the whole record to support the conclusion that the removal of the building would be consistent with the Secretary’s Standards, and would not result in a substantial adverse
change in the historic significance of the building.” This kind of opinion shopping degrades the integrity of the CEQA process and should not be the basis for the DEIR’s conclusion that the demolition of a portion of a National Register-listed building would not cause a significant impact that cannot be mitigated. *Vedica Puri, President, Telegraph Hill Dwellers* [39.53]

**Response**

Comments express concerns about the conflicting conclusions among historic resource experts related the impact of removing Building 111, which was constructed as an addition to Building 3. *CEQA Guidelines* Section 15151 states that “Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts.” EIR Section IV.D, Cultural and Paleontological Resources, on pp. IV.D.55-IV.D.56, discloses and describes the main points of disagreement.

As part of the rehabilitation and reuse of Building 3, Building 111, an addition to Building 3, would be demolished.

The HRE notes that Building 111 is included in the NRHP nomination for Building 3 as a part of Building 3. It was constructed to serve as a firehouse and was complete by the time the GGIE opened. The HRE reasons that demolition of Building 111 would remove a characteristic of Building 3 that conveys the development of the site and its association with the GGIE and that justifies the eligibility of Building 3 for inclusion in the CRHR. On this basis, the HRE concludes that the demolition of Building 111 would result in a significant adverse impact on the significance of the Building 3 historical resource.

The Planning Department has received additional information about Building 111 and its relationship to Building 3, provided in a memo to the project sponsors by historic architectural resource consultants Page & Turnbull. This additional information was not considered by the preparers of the NRHP nomination for Building 3. The Page & Turnbull memo presents supplemental evidence in support of its conclusion that Building 111 does not significantly contribute to the historic character of Building 3, and may therefore be removed without affecting the historic significance of the Building 3 resource. Building 111 was included in the NRHP nomination because of its age, not because it was considered an integral feature of Building 3. Constructed with less-refined materials, this feature was an addition intended to serve a temporary function as a firehouse during the GGIE.

After a review of the information submitted in the HRE as well as the additional information provided by Page & Turnbull, the Planning Department has determined (contrary to the conclusion in the HRE for this impact) that substantial evidence in light of the whole record supports the conclusion that the removal of Building 111 in the manner proposed would be consistent with the Secretary’s Standards, and would not result in a substantial adverse change in the historic significance of the Building 3 historical resource. In view of this finding, this impact would be considered less than significant. No mitigation is required.
As Lead Agency and author of the EIR, the Planning Department has disclosed and considered the conflicting opinions of experts and relied on its staff of historic preservation experts to independently consider the HRE against the additional information provided by historical resource experts Page & Turnbull (retained by the project sponsors). Based on additional evidence that was not available to the preparers of the National Register of Historic Places Registration Form, the Planning Department reviewed the relationship of Building 111 to Building 3, and independently concluded that Building 111 does not significantly contribute to the historic character of Building 3 and may therefore be removed without a significant adverse effect on the Building 3 historical resource.

In response to the comment that Building 111 must be evaluated as its own entity, the National Register of Historic Places Registration Form for Building 3 treats Building 111 as a component of Building 3. Since the time that the nomination form was prepared, no new information about the individual significance of Building 111 has arisen that would call for revisiting Building 111 as a separate resource.

2.6.5 U.S.S. BUTTERCUP AND ALTERNATIVES

Comments

Impact CP-9: The DEIR properly concludes that demolition of the Damage Control Trainer (U.S.S. Buttercup) would be a significant impact on the significance of this historical resource that cannot be mitigated.

As disclosed in the DEIR, the U.S.S. Buttercup (Damage Control Trainer) is a rare and distinctive object, exhibiting specialized design and construction for military training, which is an important aspect of military history. One of only a handful in the US and the only such object on the West Coast, it is significant historic resource. Please respond to the following:

- According to the DEIR, its demolition is unavoidable because it overlaps two development blocks, which cannot be modified without substantial change. Why is its demolition unavoidable? How could the development in those two blocks be changed to avoid the site?
- Please add to the DEIR’s discussion of the “No Project Alternative” consideration of the development of this historic resource as a museum.
- Could the demolition of this historic resource be avoided as a part of the “Reduced Development Alternative”?
- Was the demolition of this historic resource known and considered at the time of the Section 106 consultation? Was it considered as a part of the 2003 EIS? (Vedica Puri, President, Telegraph Hill Dwellers) [39.54]

Although Heritage concurs with the DEIR’s identification of potential historic resources and evaluation of project impacts, we request that the Final EIR further explore creative alternatives and mitigation measures that would reduce or avoid the project’s limited range of significant adverse impacts on cultural resources. (Mike Buhler, Executive Director, San Francisco Architectural Heritage) [18.1a]
Response

The *U.S.S. Buttercup* was identified as an historical resource for the purposes of CEQA in the HRE undertaken specifically for the Proposed Project. It was not identified as an historical resource in any earlier study of historic resources, nor was it considered in those earlier studies. As explained in EIR Section IV.D, Cultural and Paleontological Resources, on EIR p. IV.D.56, retention of the *U.S.S. Buttercup* cannot be accommodated as part of the Proposed Project.

Retention would preclude construction on two development blocks, resulting in a substantially different project than the Proposed Project. While demolition is unavoidable under the Proposed Project, retention of this historic resource may be feasible under certain alternatives. Retention of the resource is considered and analyzed as a component of Alternative C - No Ferry Service Alternative. Retention of the *U.S.S. Buttercup* is also considered under Alternative A - No Project Alternative (which does not preclude reuse of the resource as a museum). Retention of the resource could also feasibly be a component of the Reduced Development Alternative, but as noted above, retention has already been incorporated into Alternative C.

A comment states that the No Project Alternative should consider the development of the *U.S.S. Buttercup* historic resource as a museum. The purpose of the No Project Alternative is to allow decision-makers to compare the effects of the Proposed Project with the effects of taking no action. *CEQA Guidelines* Section 12126.6(e)(3) requires that the No Project Alternative compare the environmental effects of the Proposed Project with the effects of Project Area remaining in its existing state under current conditions (i.e., the environmental setting). Under the No Project Alternative, the *U.S.S. Buttercup* would not be demolished and would be retained as under existing conditions, and no mitigation would be required. It would therefore not be appropriate for the No Project Alternative to consider the *U.S.S. Buttercup* as potential museum space.

A comment requests that the EIR further explore alternatives or mitigation measures to reduce or avoid significant adverse impacts on cultural resources. The only significant impact to historic resources identified in the EIR is the loss of the *U.S.S. Buttercup*. Preservation experts and the EIR preparers explored a range of preservation alternatives during the analysis of alternatives for the EIR. Retention of the *U.S.S. Buttercup* is identified and evaluated under Alternative C - No Ferry Service Alternative. As described in Chapter VII, Alternatives, on EIR p. VII.54, under the No Ferry Service Alternative, the *U.S.S. Buttercup* would be retained. It is assumed under this alternative that the *U.S.S. Buttercup* would be stabilized and repaired in conformity with the *Secretary of the Interior’s Standards for Rehabilitation*, and that the resource would be made accessible to the public as part of the recreational program. For additional information regarding the reasonable range of alternatives, please refer to the response in Subsection 2.21.1, Purpose of Alternatives in EIRs, in Section 2.21, Alternatives, of this Comments and Responses document.
At such time that decision-makers consider whether to approve or disapprove the Proposed Project, they will also consider whether to approve one of the alternatives to the Proposed Project analyzed in the EIR, such as Alternative C, which would retain the U.S.S. Buttercup.

2.6.6 AVENUE OF THE PALMS

Comments

Vol. 1, IV.B.24, Aesthetics: There is no sufficient description of the historic importance of the Avenue of Palms, so the conclusion that it is not considered a Historic Resource for the purpose of this analysis, is an insufficient conclusion. The 2006 EIR Transfer & Reuse of Station TI 3-40 clearly states it to be a resource, why does this EIR fail to identify it? (Kathrin Moore, San Francisco Planning Commission) [20.23]

Response

The discussion in EIR Section IV.B, Aesthetics, of the impact that would result from removing Avenue of the Palms includes a cross reference to Section IV.D, Cultural and Paleontological Resources, for its analysis of the historic and architectural significance of Avenue of the Palms.

The 2005 EIR did not analyze the historic significance of Avenue of the Palms; rather, it notes that correspondence from the California Office of Historic Preservation (“OHP”) leaves open the question of whether features remaining from the 1939 Exposition, such as Avenue of the Palms, would be an historical resource. Page 3-40 of the 2005 EIR states that:

The National Park Service analysis in 1987 concluded that insufficient resources from the exposition existed at Treasure Island to warrant additional eligibility recommendations or listing as an historic landmark. While none of these analyses addressed the historic landscape area of the Avenue of the Palms… the OHP’s letter of March 22, 1984, advised that “the 1939 Exposition is highly significant historically, and any features remaining from that era would have a strong likelihood of eligibility, even if some alteration to them had taken place.” This suggests that the avenue, which was part of the original exposition area, would contribute to the eligibility of the exposition buildings, or could in itself qualify as an historical resource.

The 2005 EIR did not identify Avenue of the Palms as a historical resource. Yet while this question is raised in the 2005 EIR, it is answered in the EIR for the Proposed Project. On EIR pp. IV.D.38- IV.D.40, the historic and architectural significance of Avenue of the Palms is evaluated under three contexts: as a contributor to a potential GGIE landscape historic district; as an individual landscape feature; and as a potential historic district consisting of remaining GGIE landscape features and buildings. In each of these contexts, the EIR concludes that Avenue of the Palms is not eligible for inclusion in the California Register of Historical Resources based on a lack of integrity of design, materials, workmanship, setting, feeling and association. Thus, the conclusion in the EIR for the Proposed Project does not contradict that of the 2005 EIR.
2.6.7 JOB CORPS CAMPUS

Comments

2. Please include an evaluation of the Job Corps site. In numerous EIRs historic resource evaluations include adjacent parcels and even neighborhoods. The evaluation may not find any historic resources, but we don’t know that now and indirect impacts to historic resources could result from construction activities. (Hisashi Sugaya, San Francisco Planning Commission) [21.2]

- Because of the proximity of the proposed new buildings to the Job Corps campus, the buildings within the campus must be evaluated for their historic significance. Even if development would not occur on the campus, the scale and design of the proposed new construction in the vicinity could impact the integrity of setting, feeling and association of the campus buildings, resulting in potentially significant impact.
  (1) Include an evaluation of the historic significance of each of the buildings located within the federal Job Corps campus.
  (2) Analyze all potential impacts of the Project on historic resources within the Job Corps campus, including aesthetic impacts. (Vedica Puri, President, Telegraph Hill Dwellers) [39.46]

Response

The focus of the EIR’s description of setting and analysis of impacts on historic architectural resources is on resources within NSTI and, more specifically, those within the Development Plan Area. No potentially significant impact related to historic architectural resources is anticipated outside of the Project Area as a result of the Proposed Project. All NSTI buildings that were 50 years old or more in 1997, including Job Corps campus buildings, were comprehensively studied and evaluated for their historic and architectural significance in the 1997 Inventory and Evaluation. The 1997 Inventory and Evaluation found no historical resources within the Job Corps campus. Even if such buildings were found individually or collectively eligible for inclusion in the California Register of Historical Resources if studied today, the Job Corps campus buildings would not be directly affected by the Proposed Project, as the Proposed Project does not include any physical changes to the Job Corps campus. In addition, as discussed in EIR Section IV.B, Aesthetics, on p. IV.B.12, the existing visual setting on Treasure Island is characterized by “widely spaced military support facilities of a generally utilitarian character without a strong sense of spatial or design cohesiveness.” Likewise, the Job Corps campus site is not characterized by any cohesive or intact visual context contributing to its significance. As such, project-related changes to the visual setting surrounding the Job Corps campus would not be expected to indirectly result in a material impairment of the historic and architectural significance of the Job Corps campus. For these reasons, no additional study of the historic and architectural significance of the Job Corps campus is required in the EIR.
2.6.8 CALIFORNIA HISTORIC LANDMARK DESIGNATION

Comments

• The DEIR states that Treasure Island was designated as State Historical Landmark No. 987 in 1989, and is therefore included in the California Register of Historic Resources. The DEIR further states that the basis for the island’s designation is its association with GGIE “so only features associated with GGIE would be a part of the State Historic Landmark designation.”

• How does the DEIR come to the conclusion that the basis for the island’s designation State Historical Landmark No. 987 is due only to its association with GGIE and that “only features associated with GGIE would be [emphasis added] a part of the State Historic Landmark designation”? Please explain the basis for this statement.

• What does the State designation include as being the significant buildings, features and periods that are the basis for Treasure Island’s designation as a State Historical Landmark? According to the California Office of Historic Preservation’s website, the island’s history from 1939 to 1944 as the landing site for flights of the China Clipper, as well as its history as a Naval Station also seem to be a part of the recognized historic significance of the island under this designation:

“NO. 987 TREASURE ISLAND-GOLDEN GATE INTERNATIONAL EXPOSITION, 1939-40 - This artificial island was constructed of bay sand in 1936-7. It was the site of the Golden Gate International Exposition, February 18, 1939-September 29, 1940. Tall towers, gigantic goddesses and dazzling lighting effects turned the Island into a "Magic City." The exposition celebrated the ascendancy of California and San Francisco as economic, political and cultural forces in the increasingly important Pacific Region. From 1939 to 1944 the Island was the landing site for flights of the China Clipper. Treasure Island has been a U.S. Naval Station since 1941. Location: Naval Station, Treasure Island, San Francisco” (Vedica Puri, President, Telegraph Hill Dwellers) [39.43]

Response

The State Landmark designation does not specify any particular features that are considered part of or contributing to the significance of the resource. As the title “State Historical Landmark No. 987 Treasure Island – Golden Gate International Exposition, 1939-40” indicates, the significance of the resource is premised on its association with the GGIE. Other associations (as an airport, as a Naval Station, and as an engineering achievement) are noted in the description but are subsidiary to its association with the GGIE under this designation.

As discussed on EIR p. IV.D.29, Treasure Island’s intended subsequent role as an airport was shortly abandoned with the advent of World War II when the Navy took possession of the island. Buildings 1, 2, and 3, will be retained to continue to convey their individual significance as features of the GGIE, and as their brief intended role (though abandoned) as airport facilities after the close of the Exposition.
As discussed in Section IV.D, Cultural and Paleontological Resources, on pp. IV.D.33-IV.D.38, the features of Treasure Island from the Navy’s tenure on the island were studied and evaluated for their eligibility for inclusion in the California Register of Historical Resources. With the exception of the *U.S.S. Buttercup*, they were not found to be eligible as individual resources, and were also not found to be collectively eligible as contributors to a potential Navy historic district on Treasure Island.

As discussed in the 2005 EIR on p. 3-40, at the request of the OHP in 1998, the significance of Treasure Island was considered and evaluated as an engineering achievement. The evaluation concluded that the island did not appear to be a significant example of the dredge-and-fill techniques of the U.S. Army Corps of Engineers, which had been doing similar work throughout the Bay Area, California, and the United States decades before the island was built.

### 2.6.9 IMPACT ON YERBA BUENA ISLAND

**Comments**

- The DEIR fails to evaluate any buildings on YBI that are now 50 years in age or older that were not already studied in the 1997 inventory. The DEIR cannot exclude these from evaluation by simply concluding that they “would not be directly affected by the Proposed Project.” Please respond to the following:
  1. Provide a list of all buildings on YBI that are now 50 years in age or older that were not already studied in the 1997 inventory.
  2. Evaluate each building for its historic significance.
  3. Show the location of each building in proximity to all proposed new development on YBI, including the height and mass of the proposed new buildings.
  4. Evaluate whether the proposed new development on YBI could affect the integrity of the setting, feeling and association of any of these yet-to-be-identified historic resources. *(Vedica Puri, President, Telegraph Hill Dwellers)* [39.47]

**Impact CP-12:** The DEIR finds that new construction within and adjacent to the Senior Officers’ Quarters Historic District on YBI would not have a significant impact on these historic resources because TIDA will review all proposed work to make sure the new construction complies with the Secretary’s Standards.

- Please describe in detail and illustrate graphically exactly what new construction is proposed within the Senior Officers’ Quarters Historic District and where it would be located in relation to the buildings in the district. Please include maps and plans depicting the proposed additions.
- Include the proposed height of any such new construction or additions within the Senior Officers’ Quarters Historic District. Compare the height of proposed new construction or additions to the heights of the buildings within the historic district.
- Please describe in detail exactly what new construction is proposed *adjacent* to the Senior Officers’ Quarters Historic District, including its height and design.
- Why is it necessary to build a parking lot adjacent to the historic district (per statement in DEIR)? Where would a new “fire station” be located?
• In lieu of relying on the TIDA board to ensure that the historic district will be protected from inappropriate, out of scale development, please discuss other, more effective ways to avoid or mitigate potentially significant impacts on these historic resources, including requiring a later project specific EIR for each project that proposes to alter historic district properties or add new construction within the historic district, and requiring review by the City’s Historic Preservation Commission of each such project. As stated previously in these comments, additional project-specific environmental review, together with public review by an expert body is the only way potentially significant impacts could be avoided or adequately mitigated.

• The DEIR states that the historic Nimitz House and Senior Officers’ Quarters will be “adaptively reused.”

• What uses are being programmed for the Nimitz House? For the other Senior Officers’ Quarters? For the Torpedo Assembly building? Discuss how each of these proposed uses would impact the significance of these historic resources?

• What standard will be used for alterations to these historic resources: preservation, rehabilitation or restoration?

The term “adaptive reuse” is vague and insufficient to determine if there will be significant impacts on these historic resources under CEQA/NEPA without later project specific review under CEQA.

Impact CP-13: Whether the Proposed Project could contribute cumulatively to impacts on historic resources on YBI when considered with nearby projects depends on how the resources within the Senior Officers’ Quarters Historic District are treated. Unless each proposed project on YBI is considered by a separate project specific EIR (see discussion under Impact CP-12 above), the impacts of the Proposed Project on this historic district could be cumulatively significant when considered together with those of the Bay Bridge East Span Project and YBI Ramps.

Further, given that the DEIR repeatedly says that: “it is not possible to foresee the ultimate impact from the current concept-level design” we do not believe the DEIR can possibly determine with any certainty what the cumulative impacts of the Proposed Project will be. (Vedica Puri, President, Telegraph Hill Dwellers) [39.58]

Response

There are two structures on Yerba Buena Island now over 50 years old that were not studied in the 1997 Inventory and Evaluation: Building 255, built in 1947, and Building 261, built in 1948. Both buildings are known by the name “Chlorinator,” and both are utilitarian structures. Building 255 houses equipment that was used to boost chlorine in the incoming water supply from the San Francisco main supply line to the Island. Building 261 houses equipment that was used to boost chlorine in the incoming backup water supply from the incoming water supply line from Oakland. The locations of these buildings are shown on the following page:
These buildings have been studied and evaluated in a supplement to the HRE by historic resource consultants Knapp & VerPlanck. Knapp & VerPlanck concluded that these features are ineligible for inclusion in the California Register of Historical Resources. No evidence indicates that they are associated with important historical events or persons sufficient to qualify for inclusion in the California Register of Historical Resources under Criterion 1 (Events) or Criterion 2 (Persons). They are neither unique nor rare examples of public utilities infrastructure, and therefore do not qualify under Criterion 3 (Design/Construction). It is not necessary to evaluate whether the Proposed Project could affect the integrity of the setting or feeling of the buildings on Yerba Buena Island, since there is no evidence that indicates these buildings could potentially qualify for inclusion in the California Register of Historical Resources.

Knapp & VerPlanck, Preservation Architects, Memo, Evaluation Addendum for Chlorinator Buildings 251 and 261, Yerba Buena Island, November 11, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.
As discussed on EIR p. II.22, the Nimitz House and the other Senior Officers’ Quarters of the historic district and the Torpedo Assembly Building would be rehabilitated and programmed for public uses. A parking lot adjacent to the historic district would serve the proposed new public uses. Potential new construction within the Senior Officers’ Quarters Historic District is illustrated and described in the proposed Design for Development on pp. 274-275. The proposed Design for Development Standards Y5, 7, and 15 require that the rehabilitation of buildings and contributing landscape features within the Senior Officers’ Quarters Historic District conform with the Secretary’s Standards, and proposals for any such work would be subject to review under the process described in the response in Section 2.6.3 above. As also noted in the response in Section 2.6.3, CEQA Guidelines Section 15064.5 (b)(3) states that a project conforming to the Secretary’s Standards would generally have a less-than-significant impact on an historical resources; therefore, although specific designs are not currently available for evaluation, enough information is known to conclude that the impact of the rehabilitation would be less than significant.

One comment inquires about the location of a possible fire station on Yerba Buena Island. While no fire station is currently proposed for development on YBI, it is a permitted use for parcel A-3, which sits just outside the boundaries of the Senior Officers’ Quarters Historic District, as shown on Figure Y5d of the proposed Design for Development. While the amount of development proposed for Yerba Buena Island would not require a second fire station, the San Francisco Fire Department requested a location be identified in case one is required should certain development thresholds be exceeded. As discussed in Section IV.L, Public Services, p. IV.L.18, a new joint Police-Fire station would be constructed on Treasure Island in Phase 2 on Block IC4, as shown in Figure IV.A.2: on EIR p. IV.A.17.

2.6.10 SECTION 106

Comment

- The DEIR refers to Section 106 compliance for Navy actions, including the transfer of Navy property out of federal ownership. Please respond to each of the following questions:

1. When did compliance with Section 106 occur?
2. What is the date of the MOA?
3. What is the term of the MOA?
4. Who were the parties to the MOA?
5. Who signed the MOA on behalf of the City of San Francisco?
6. Did the MOA include a list of historic resources to be protected?
7. What uses were proposed for historic resources on TI and YBI as of the date of the MOA?

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6 Memorandum from Jack Sylvan to Gary Massentani (San Francisco Fire Department), Re: Treasure island and Yerba Buena Island Fire Protection, June 29, 2010.
2. Comments and Responses

6. Historic Resources

(8) Explain in detail the specific provisions of the MOA.

(9) What are the conditions of the MOA as to the treatment of each identified historic resource?

(10) The DEIR states that upon conveyance to TIDA the MOA “expires.” Explain why.

(11) Is TIDA a party to the MOA?

- The DEIR refers to a 1997 Inventory and Evaluation undertaken by the Navy. Since this inventory is now over 13 years old, will the Navy undertake a new independent inventory prior to transfer in connection with its required NEPA and Section 106 compliance?

- The DEIR states that the Navy notified the Advisory Council on Historic Preservation in connection with the proposed conveyance from the Navy to TIDA and “received notification that the Council declined to participate in the consultation.” In what month/year did this notification by the Navy to the Advisory Council occur? Have they been notified in 2010? (Vedica Puri, President, Telegraph Hill Dwellers) [39.44]

Response

The Memorandum of Agreement Between the Department of the Navy and the California State Historic Preservation Officer For the Layaway, Caretaker Maintenance, Interim Leasing, Sale, Transfer, and Disposal of Historic Properties on the Former Naval Station Treasure Island (“MOA”) was executed on June 2, 2003.7

Signatory parties to the agreement were The Navy and the California State Historic Preservation Officer. The City of San Francisco is listed as an “Invited Signatory Party.” The Bay Miwok Band, the California Preservation Foundation, and San Francisco Architectural Heritage are listed as “Concurring Parties” to the MOA. TIDA is not a signatory party to the agreement. No uses were proposed for the buildings upon execution of the MOA. No conditions as to the treatment of historic architectural resources were stipulated in the MOA.

In partial compliance with its obligations under the MOA, the Navy prepared National Register of Historic Places Registration Forms and Historic American Engineering Record (HAER) documents for six properties at NSTI under its MOA obligations. As called for by the MOA, the nominations covered the Senior Officers’ Quarters Historic District, Quarters 10 (with Building 267); Building 262; Building 1; Building 2; and Building 3 (with Building 111). Notice of the Navy’s nomination submission to the Keeper of the National Register was sent to the Mayor of the City of San Francisco on May 7, 2007, as required under 36 CFR 60.9. On February 26, 2008, the Senior Officers’ Quarters Historic District was placed on the National Register of Historic Places, as well as Quarters 10 (with Building 267), Building 1, Building 2, and Building 3 (with Building 11) as individual resources.

7 A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.
Overall, the Navy is in compliance with the terms of the MOA. However, there are some stipulations that are in process or that cannot be completed until the historic properties are transferred out of federal ownership/termination of the MOA. According to the Navy, these are:

1. Coordinate the transfer of documents and photographs with the National Archives.
2. Survey of submerged sensitive areas to determine the presence of potentially significant submerged resources. We’re coordinating with SHPO [State Historic Preservation Officer] on the determination that no significant resources exist in those areas based on the results from Caltrans surveys.
3. Coordinate with SHPO on the licensing and leasing uses of historic buildings that cannot be modified to conform to the Secretary of Interior Rehabilitation Standards. Currently there is none.
4. Report to SHPO on an annual basis of problems and unanticipated issues related to the management of historic properties. This is an ongoing responsibility until the property transfer or termination of the MOA.”

When all of the terms of the MOA have been fulfilled, the Navy will issue a written notification of the termination to all parties.

2.6.11 COAST GUARD

Comment

Summary, page S.1 - Please reformat first paragraph to make it clear you are describing the former NSTI in the discussion of historic resources. Right now reference is to the Island and there are historic resources on property owned by the US Coast Guard (USCG). These are:

- Quarters B and C - Determined to be eligible for listing on the Historic Register in 1997.
- Quarters 8 and 9 - Potentially eligible for listing on Historic Register. (This determination was made by Navy).

Please place a paragraph before the sentence starting, “The Islands also include...” and then reference USCG historical buildings. Or just make it clear you are focusing solely on the NSTI side of YBI for the discussion of historical resources. *(P. M. McMillin, Captain, U. S. Coast Guard)* [10.6]

Section IV, page IV.A.6 - The lighthouse was built by the Lighthouse Board which later became the Lighthouse Service and finally the US Coast Guard. The Army did not build the lighthouse. Please refer to page II.11 of this DEIR for The Cultural Resources Survey for Group San Francisco can be provided for reference.

Section IV, page IV.A.10 - Same as comment 4 above.

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Section IV, page IV.D.6 - There is no mention of the USCG’s history on the Island during the Army period. Please include at a minimum discussion of the 1872 lighthouse.

Section IV, page IV.D.6 - The Lighthouse Board, not the US Army, built the lighthouse keeper’s residence. (P. M. McMillin, Captain, U. S. Coast Guard) [10.9]

Section IV, page IV.D.27 - The US Coast Guard should be listed in the following sentence, “Yerba Buena Island is a natural island that has been used by private parties and by the Army and Navy since the 1840s” The USCG’s presence on the Island dates back to 1872. We have a long history on YBI which should be acknowledged. (P. M. McMillin, Captain, U. S. Coast Guard) [10.10]

Section IV, page IV.D.28 - Lighthouse was built by the Lighthouse Board after receiving a permit for the construction by the War Department. Please see comment 9 and rectify this ownership issue throughout the document. (P. M. McMillin, Captain, U. S. Coast Guard) [10.11]

Section IV, page IV.D.30 - The USCG Historic Districts should probably be mentioned in this portion of the document. Although not in the project area, the boundaries of at least one run to Hillcrest Road and may be impacted by any development of a bike path. Again these sites are not within the Project Area but adjacent to it.

Section IV, page IV.D.61 - Although the USCG’s historic districts are outside the project boundary – any additional work down to City of SF roads may require incursion onto USCG property. In that case, the project may have some impacts on adjacent USCG properties – so a brief mention of these impacts might be warranted in this document. It is believed that any impact to these resources will be slight and wholly able to be mitigated. (P. M. McMillin, Captain, U. S. Coast Guard) [10.12]

Response

The focus of the EIR’s description of setting and analysis of impacts on historic architectural resources is on resources within NSTI and, more specifically, those within the Development Plan Area. No potentially significant impact related to historic architectural resource is anticipated outside of the Project Area as a result of the Proposed Project. See Figure II.2: Proposed Project Area, in EIR Chapter II, Project Description, p. II.8. For this reason, the historic context of Coast Guard resources and potential impacts on these resources are not discussed and analyzed in EIR Subsection D.2, Historic Architectural Resources. In response to comments, the EIR Summary Chapter, Section IV.A, Land Use and Land Use Planning, and Section IV.D, Cultural and Paleontological Resources, are revised as specified below (deleted text is shown in strikeout and new text is underlined).

The last three sentences of the paragraph under the heading “Existing Uses” on EIR p. S.1 are revised as follows:

…The designated historic buildings within the Development Plan Area on the Islands are Buildings 1, 2 and 3 on Treasure Island, and the Torpedo Assembly Building, the Nimitz House, and Quarters 10 and its garage on Yerba Buena
Chapter IX
2. Comments and Responses
6. Historic Resources

Island. In addition, the National Register-listed Senior Officers’ Quarters Historic District is located on Yerba Buena Island; it is comprised of Quarters 1 through 7, a family quarters, associated garages and formal landscaping elements. The Islands also include areas that are not part of the Development Plan Area: U.S. Coast Guard facilities on Yerba Buena Island, a U.S. Department of Labor Job Corps campus on Treasure Island, and Federal Highway Administration (“FHWA”) land occupied by the San Francisco-Oakland Bay Bridge (“Bay Bridge”) tunnel structures on Yerba Buena Island.

The paragraph under the heading “Adjacent Land Uses” on EIR p. IV.A.6 is revised as follows:

The U.S. Coast Guard maintains an active station that covers approximately 39 acres on the southeast side of Yerba Buena Island. This station includes housing, administrative facilities, buoy maintenance facilities, docks, storage, and a lighthouse that was built by the U.S. Army. The station is not part of the Project Area or the Development Plan Area and would not undergo any changes as part of the Proposed Project.

The last paragraph on EIR p. IV.A.10 is revised as follows:

Unlike Treasure Island, Yerba Buena Island is a natural island that features steep slopes and dense vegetation. The island has been used by private parties and by the U.S. Army, and Navy, and U.S. Coast Guard since the 1840s. Land uses on the island include residential, open space, and a portion of the Bay Bridge structure (see Figure IV.A.1).

The last sentence of the first paragraph under the heading “Army Period” on EIR p. IV.D.6 is revised as follows:

In 1875, the Army Lighthouse Board (now the U.S. Coast Guard) constructed the lighthouse, lighthouse keeper’s residence and support buildings; these are still present at the southern end of the island outside of the Development Plan Area.

The second sentence of the last paragraph on EIR p. IV.D.27 is revised as follows:

Although the Navy has managed the portion of Yerba Buena Island under its control and Treasure Island (collectively, Naval Station Treasure Island, or “NSTI”) as a single facility since 1940, the two islands have different histories. Yerba Buena Island is a natural island that has been used by private parties and by the Army, and Navy, and Coast Guard since the 1840s. Treasure Island is an artificial island, constructed in 1936-1937 in the rocky shoals north of Yerba Buena Island.

The third sentence of the first paragraph on EIR p. IV.D.28 is revised as follows:

The context for historic architectural resources on Yerba Buena Island begins with the Army’s occupation of the island in 1867, when the Army asserted a claim and took possession of the island. Troops were stationed on the southeastern part of the island, above a cove near the modern Coast Guard
Chapter IX
2. Comments and Responses
6. Historic Resources

Station. In 1872, the Army Lighthouse Board (now the U.S. Coast Guard) constructed the lighthouse and lighthouse keeper’s residence at the southern end of the island (these buildings still stand, but they are outside of the Development Plan Area)…