



SAN FRANCISCO PLANNING DEPARTMENT

March 23, 2011

Mr. Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Dear Mr. Wycko,

On March 16, 2011, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed Pier 36/Brannan Street Wharf Project. After discussion, the HPC arrived at the comments below:

- The HPC agreed with the assessment made in the DEIR that the proposed project is not compatible with the historic district.
- In reviewing the preservation alternatives, the HPC agreed more information is needed about what is included or excluded in the cost estimate for Alternative B (i.e. tax credits and other incentives for preservation of historic resources).
- The HPC agreed additional preservation alternatives are needed, perhaps a variation of Alternative B that shows retention of more historic fabric.
- The HPC agreed more analysis is needed for generating a leasable and revenue-producing project for the Port to off-set the cost for preservation and rehabilitation as a preservation alternative.
- The HPC is not comfortable with the determination made in the DEIR that there is no cumulative impact simply because the previous projects in the historic district were found to be in compliance with the Secretary of Interior's Standards. The HPC points out that a historic resource, the adjacent pier (Pier 34), has already been lost.
- The HPC agreed documentation of previous and current projects is needed in order to evaluate new proposals and their cumulative impacts to the historic district in the future.
- The HPC noted that there is considerable cost associated with long-term storage / curatorship of salvage materials. The HPC agreed that salvage materials, if and when possible, should be used in on-site interpretive displays.
- The HPC agreed that the Interpretative Program should be prepared by a qualified consultants meeting the minimum qualifications.
- The HPC agreed that the Interpretative Program should include the history of the entire Port of San Francisco Embarcadero Historic District, so that the site is viewed in the broader context of the district to which Pier 36 contributes to.

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- The HPC agreed further clarification is needed for Mitigation Measures (MM) CP-1(b) – identification of what resource is being mitigated.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles Chase".

Charles Chase, President
Historic Preservation Commission