



SAN FRANCISCO PLANNING DEPARTMENT

October 25, 2010

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

Re: 2008.0968E – North Beach Public Library and Joe DiMaggio Playground Master Plan Project – Draft Environmental Impact Report

Dear Mr. Wycko:

Thank you for the opportunity to comment on the North Beach Public Library and Joe DiMaggio Playground Master Plan Project – Draft Environmental Impact Report. The Historic Preservation Commission held a public hearing on October 6, 2010 and would like to provide the following comments:

- The HPC concurs with the comments made by Mike Buhler, Executive Director of San Francisco Architectural Heritage at the hearing regarding the DEIR (see also letter from San Francisco Architectural Heritage dated October 12, 2010).
- The HPC believes that the DEIR is inadequate in describing the North Beach Library Master Plan goals, content, timing and funding.
- The HPC believes the preservation alternative analysis of the report is inadequate and needs further evaluation. The proposed alternatives do not go far enough to “substantially lessen” any significant adverse impacts to a historic resource. Specifically, the report should include an additional preservation alternative that comes closer to meeting the project objectives of creating a functional, compact library. An alternative that includes both an addition, potentially at the east of the library, and the excavation of the basement level should be studied.
- The HPC believes the DEIR is inadequate because it does not adequately evaluate reasonable re-location, re-organization, re-planning and re-use options for the recreational and open space areas of the site in order to come up with a better preservation solution / option for the library to the same degree that these areas are studied, re-planned and re-organized in the actual project.
- The HPC believes that the proposed landscape design is suburban in feel and the approach of adding open space to the project site is ill-defined.

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

- The HPC believes that the DEIR does not adequately analyze the impacts of such a large scale development on a traditionally developed urban environmental and context.
- On page 246, the HPC disagrees with why the reasoning for rejection of the northern expansion / addition. The HPC believes that an addition that is aligned with or placed in front of the existing building can be found compatible to the historic resource (as evident for the case at Parkside, and the Marina Public Libraries).
- The HPC disagrees that an addition on the northern side would cut off the existing recreation area from the “Triangle.” The HPC also is not convinced that closing Mason Street is a good idea or feasible.
- With regards to Mitigation Measures M-CP-2a, the HPC recommends that the HABS Level II documentation be reviewed and approved by the HPC and/or the Preservation Technical Specialist of the Planning Department.
- With regards to Mitigation Measures M-CP-2b, the HPC recommends that the Interpretive Program be coordinated and written by a historian meeting the professional qualifications of the Secretary of the Interior’s Standards and that the program include information about all of the Appleton and Wolfard libraries. The content of the Interpretive Program should be reviewed and approved by the HPC and/or the Preservation Technical Specialist of the Planning Department.
- With regard to the statement made on page 62 – “The proposed project would not conflict with the Sustainability Plan” the HPC believes that while this may be true, the HPC also believes that re-use of the North Beach Library would be more sustainable.
- With regards to the Merced Branch Public Library, the HPC does not agree that this library has a high degree of integrity given the scope and extent of the on-going alterations to the building and site. As such, the HPC believes that there will be cumulative impacts to the collection of Appleton and Wolfard libraries as a result of the demolition of the North Beach Library.
- With regard to the discussion of the Multiple Property Listing (pages 145 to 155), the HPC believes that the Ortega Library should not be treated as extant and ineligible given the fact that it has already been demolished. As for the Western Addition and the Excelsior Libraries, the DEIR stated that they are ineligible when in fact, the HPC found them to be eligible at the Oct. 7, 2009 public hearing.

HPC Comments on the DEIR – North Beach Branch Public Library and Joe DiMaggio
Playground Master Plan Project

Page 3

The HPC appreciates the opportunity to participate in review of the North Beach Public
Library and Joe DiMaggio Playground Master Plan Project – Draft Environmental Impact
Report.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Chase". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Charles Chase, President
Historic Preservation Commission

CC: HPC

John Rahaim, Planning Director

Michael Jacinto, Planning

Tim Frye, Planning