

Synthesis of 2007 Draft San Francisco General Plan Preservation Element Comments

	General Comments	Source(s)	Action Taken/ARG Recommendation	Notes	Planning Input needed
1.	More about <i>why</i> policies are put forth and how relate to legal/professional standards of historic preservation practice	NTHP	ARG reviewed model preservation elements from other cities. Davis and Santa Clara do not have legal section. San Diego and Riverside have basic similar to SF.		
2.	Greater reference to programs, laws, codes, legal basis	NTHP	Revisions made.		
3.	Language re: acknowledge contexts and resources associated with diverse populations	NTHP, Templeton	Revision made.		
4.	Add policy re: cultural diversity	LPAB 11-7-07	Policy 1.6 added.		
5.	Add Policy re: maintaining funding for staff and to carry out plan; Policy re: increasing funding	NTHP; Comm. Mtng.	ARG reviewed model preservation elements from other cities--does not appear to be standard component.		Planning Dept. Input needed.
6.	Use "historic resource" instead of architectural references; mention parks, open space and cultural landscapes; streetscapes	NTHP; FOMC; LPAB 11-7-07; P&T	Historic resource defined to include landscapes in addition to building, sites, structures, and objects. Architectural references changed to "historic resources" where appropriate.		
7.	Include need for maintenance (original design intent) as part of policy for historic cultural landscapes and parks	FOMC	Language added to policy 2.10 and the corresponding implementation measure.		
8.	Include references to the Secretary of the Interior's Standards for Cultural Landscapes	FOMC	Guidelines for the Treatment of Cultural Landscapes added where appropriate.		
9.	How will this Element be cross-referenced and integrated into the City's CEQA enabling legislation and policies?	NTHP	Selected Preservation Elements from other cities were reviewed and served as models. While some explain CEQA and its relevance to historic resources, they did not appear to contain any reference to their city's CEQA enabling legislation. Additional language on CEQA added to the "Legal Basis," "State Context" and regarding the OHP and its role.		
10.	Objective 3 and its supporting Policies are well written and should be a model for other parts of the Element; also the Opposite: Objective 3 should be re-written in same voice as the other sections	NTHP; Comm. Mtng.	Document revised for consistent voice.		
11.	Add a Policy similar to 3.1 (re: GIS) but for historic resources	NTHP	Added policy similar to 3.1 for historic resources.		
12.	Implementation Plan will need to be reviewed for CEQA issues	City Attorney	City staff will address.		
13.	LPAB's role should be strengthened	Comm. Mtng.; Horton	ARG action pending outcome of election.		
14.	Add specific language about contributory buildings in Districts	Comm. Mtng.	Policy 1.3 has information on districts and contributors. "Individual resource" "district" "district contributor" added to		

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			glossary.		
15.	Add Policy re: using General Fund for other preservation activities	Comm. Mtng.	Per City staff comments on feasibility, no changes were made.		
16.	Include more prescriptive language, too discretionary, vague regulation	Comm. Mtng.	Per City staff comments on appropriateness, no changes were made.		
17.	Include a definition of demolition; work with DBI to make it consistent	Comm. Mtng.; Horton	Definition added to glossary		
18.	Address neighborhood character and seismic retrofit – adaptive use strategies	Comm. Mtng.	Neighborhood reference added to introduction. Revision made; cross referenced with Community Safety Element of the General Plan.		
19.	Look at other Preservation Elements from other jurisdictions	Comm. Mtng.	ARG has reviewed preservation elements from Riverside, San Diego, San Juan Bautista, Davis, and Santa Clara.		
20.	State that Preservation Element will be equal to other mandatory General Plan Elements	Comm. Mtng.	ARG has reviewed all other General Plan Elements and does not find a similar statement. The Preservation Element is not one of the General Plan Elements required by State law.		
21.	Research how other cities have taken their Element through CEQA/EIRs	Comm. Mtng.	Major Environmental Assessment and the City Attorney will make that decision.		
22.	Discuss the public benefits of historic preservation	Comm. Mtng.	Revision made.		
23.	Detail inventory database: maps, links to status of properties and pending permits, include significant trees	Comm. Mtng.	Added policy similar to 3.1 regarding GIS for historic resources. Individual trees (not component of a cultural landscape) are not part of historic resource surveys or city, state, or federal lists for historic resources and have not been included.		
24.	Grey areas to be clarified: contributory buildings outside district boundaries; should Structures of Merit category be eliminated?; facadism as demolition; definition of demolition	Comm. Mtng.	Definition of contributing buildings defined in Policy 1.3 and in glossary. Decisions on Structures of Merit category beyond scope of this element. Demolition defined in response to #17. Facadism added to glossary		Planning Dept. input needed regarding eliminating Structure of Merit
25.	Add discussion of mitigation for demolitions, meaningful, such as fees or historic designations	Comm. Mtng.	ARG reviewed model preservation elements from other cities. Discussion of mitigation measures is too specific for a preservation element.		
26.	Weave in discussion of parks, streetscapes, gardens, cultural landscapes	Comm. Mtng.	Cultural landscapes defined in document. Parks, streetscapes, and gardens not individually addressed because they would fall under cultural landscapes.		

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27.	Address the relocation of resources – what should be allowed, change of context, how far you can move them	Comm. Mtng.	Relocation should be assessed on a case-by-case basis. ARG did not address this comment.		
28.	Prudent to do a full EIR for the Element	Comm. Mtng.	Major Environmental Assessment and the City Attorney will make that decision.		
29.	Implementation should have realistic timeframes, allow for long timeline and realistic staff availability	Comm. Mtng.			Planning Dept. input needed for Implementation Plan.
30.	Include other departments in responsibilities, try to partner with other City Agencies	Comm. Mtng.			Planning Dept. input needed for Implementation Plan.
31.	Explore ways to further protect significant parks (through Landmarking or historic districts)	FOMC	Additional language on cultural landscapes added to Policy 2.5 and 2.10.		
32.	Add references to Parkmerced	Goodman	References to current planning issues are too specific for a preservation element.		
33.	Add Policy re: review of all large scale proposed district changes, especially in the western region	Goodman	Protection of historic districts is addressed in Policies 2.2 and 2.3.		
34.	Element is timid, needs to be bold and forward-looking	Horton	ARG edited the Preservation Element to be consistent with standard technical language and to the same level of completion as of other model preservation elements.		
35.	An accounting needs to be made of other studies and surveys done in the past, and known resources should be accessible to the public, planners, and other agencies	Horton	Language added to Policy 1.1. ALSO ADDED TO IMPLEMENTATION MEASURES		
36.	Assess preservation policies in other Elements and Plans and make consistent with this Element	Horton	Revisions made.		
37.	Add Policy about prevention of demolitions, public input or review of serial permits	Horton	These issues are addressed throughout the document. Specifically, the collection of Policies under Objective 2 addresses preservation of historic resources over demolition.		
38.	Implementation should be part of the document and not separate, so that it doesn't get lost/forgotten	Horton	Implementation summaries are included in Element. Full implementation measures are treated in a separate document (the Implementation Plan).		
39.	Edit: "Preservation Staff" references should be replaced with "The Planning Department or other applicable city agencies"	Horton	Revisions made where appropriate.		
40.	Edit: spell out 19 th and 20 th as "nineteenth" etc...centuries	LPAB 11-7-07	Revisions made.		
41.	Look at OHP statewide implementation plan	LPAB 11-7-07	California Statewide Historic Preservation Plan reviewed and information added to document where		

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			appropriate.		
42.	Address issues of meeting Title 24 and compatibility with preservation, maybe add a Policy	LPAB 11-7-07	Statement added regarding Title 24 in Policy 6.3		
43.	Include more about philosophical underpinning that historic resources have intrinsic value	LPAB 11-7-07	Addressed under comment #22.		
44.	Recognize archeological and cultural throughout document instead of just in Objective 3; Sacramento is calling theirs a “Historic and Cultural Resource Element” instead of a “Historic Preservation Element”	OHP	ARG has edited the document to include references to archeology. In general cultural resources are a phrase that covers a broad range of resources. For clarity we have referred to historic resources and distinguished archeological resources where appropriate.		
45.	Expand upon statements to clarify for general public	P&T	ARG has revised document for improved clarity.		
46.	Use NR language such as “clusters” instead of “groupings”	P&T	“District” used wherever possible. “Cluster” use when appropriate.		
47.	Website/outreach should include information about CEQA process, workshops for the public and consultants	P&T	Covered by implementation plan.		
48.	There is no conclusion	P&T	ARG reviewed model preservation elements. None contained conclusions.		
49.	Implementation measures are not adequate; Track changes remove all implementation measures throughout Element	Shanahan	City staff consulted, and implementation measures will be a separate document.		
50.	Element fails to address issues of underrepresented minority groups; SF should follow the lead of the Statewide Historic Preservation Plan and prioritize outreach to underrepresented communities	Templeton	Added to Policy 1.6. ALSO ADDED TO IMPLEMENTATION MEASURES.		
51.	Declare historic preservation a core value, integral	Heritage	Revision made—language added throughout document.		
	Specific Comments				
	Introduction				
52.	Track changes – refer to open space and ROSE element	FOMC	References to cultural landscapes have been included where appropriate. Open spaces are not necessarily historic.		
53.	Track changes – add more detail to this section, various edits	Shanahan	Revision made to introduction.		
54.	Track changes – take out number of Preservation Bulletins	Shanahan	Revision made.		
	Overview History				
55.	Include more (many listed additions)	NTHP	Preservation elements are intended to be brief. Additions added where appropriate.		
56.	Include information about parks, that people lived there after 1906	FOMC	Preservation elements are intended to		

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	Earthquake, track changes suggested		be brief. There are many neighborhood stories that are too specific for a brief overview history.		
57.	Mention GG Park, Track changes suggested	FOMC	Information on founding of Golden Gate Park added.		
58.	Section is old-fashioned	LPAB 11-7-07	This section has been revised to follow periods of development in a table form similar to other elements.		
59.	Edits: p. 2: change “conversion that was often forced, and virtual enslavement” to “conversion and acculturation that was often forced, bound labor”	Cherny	Revision made.		
60.	Edits: p. 4: change “Exposition that same year, all classically” to “Exposition earlier that year, all classically”	Cherny	Sentence removed.		
61.	Add more information about settlement pattern of native people in SF and tribal affiliations, also mention archeological features include historic archaeological features as well	OHP	Revisions made.		
62.	As written emphasizes architectural response to major events; recommend adding info. Re: influence of ethnic groups, cultural groups, labor, etc...Also mention development of neighborhoods, not just buildings	OHP	Revisions made.		
63.	Track changes – add reference to Port and related historic districts, industrial/warehouse/worker housing	Shanahan	Preservation elements are intended to be brief. Additions added where appropriate. Historic district info added.		
64.	Track changes – add reference to Telegraph Hill survival during 1906 Fire; impact of 1939 World’s Fair	Shanahan	Revisions made.		
65.	Track changes – various re: last paragraph needing to avoid being “dated” and not refer to specific bulletins or timelines, need to mention other already finished neighborhood contexts	Shanahan	Listing all neighborhood contexts is too detailed and dated for Preservation Element. ADDED TO IMPLEMENTATION MEASURES.		
	Historic Preservation in SF				
66.	Mention surveys conducted by Heritage	NTHP	Listing all surveys is too detailed for Preservation Element.		
67.	Mention legal contexts	NTHP	Covered in Legal Basis section.		
68.	Include information on past efforts to adopt Preservation Element	NTHP	Does not seem to relevant to preservation policy		
69.	Track changes – include reference to ROSE element	FOMC	Revision made.		
70.	Include discussion of NHPA and national context	Damkroger	Discussed under Legal Basis: Federal Context.		
71.	Mention founding of SF Architectural Heritage	Damkroger	Added Heritage info.		
72.	Track changes – various edits	Shanahan	Revisions made where appropriate.		
	Historic Resources Survey Program				
73.	Re-order discussion of context-based process to beginning and contrast	NTHP	Revision made.		

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	with documentation of individual resources				
74.	Re-word to clarify benefits of survey re: environmental review, take out “transparent”	NTHP	Revised per comments.		
75.	Track changes: remove “credits” after tax	Damkroger	Agree with City comments, that Mills Act isn’t a tax credit, but the phrase “tax credit” is a quick way to imply tax benefits associated with preservation, and “other incentives” is specified.		
76.	In addition to Bulletin 24, also reference SIS for Archeology and Historic Preservation (foundation for preservation planning)	OHP	Revision made.		
77.	Track changes – various	Shanahan	Revisions made where appropriate.		
	Relationship to Land Use in Planning				
78.	Include information re: role of Element in General Plan and in relation to other Plan elements and Area Plans	NTHP	References to other Plan elements added. ALSO ADDED TO IMPLEMENTATION MEASURES.		
79.	Track changes – reference Standards for Landscapes	FOMC	Revision made.		
80.	Track changes – reference other Elements dealing with landscapes	FOMC	See comment 69.		
	Legal Basis				
81.	Include brief description of how SF works with each law/regulation as a CLG	NTHP	Looked at other preservation elements and description not included.		
82.	Better citation of each law and provisions related to historic resources	NTHP	Looked at other preservation elements and citations not included.		
83.	Track changes – include Standards for Cultural Landscapes	FOMC	<i>The Secretary of the Interior’s Standards for the Treatment of Historic Properties</i> applies to all resource types. <i>Where the Guidelines for Preserving Rehabilitating, Restoring & Reconstructing Historic Buildings</i> are mentioned, <i>The Guidelines for the Treatment of Cultural Landscapes</i> are also mentioned.		
84.	Track changes – reference Policy 2.2 of Planning Code	FOMC	Per City’s comments, Policy 2.2 of the Planning Code not referenced because not all open spaces are historic.		
85.	Track changes – discuss evolution of understanding of historic resources, more emphasis on social history, less elitist, looking at neighborhoods instead of individual bldgs	OHP	OHP paragraph added.		
86.	Track changes – clarify that locally designated properties are not automatically listed on the CR	OHP	The language the OHP comment addresses was revised in a prior draft.		
87.	Track changes – reference Section 4(f), clarify CR	Shanahan	Language on Section 4(f) added.		
88.	Track changes - address Charter Law and General Law	Shanahan	This discussion is too broad for the Preservation Element; more appropriate		

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			in the introduction to the General Plan.		
89.	Track changes - expand on other duties of LPAB, text edits, clarify TDR background, do not refer to Bulletins	Shanahan	NR nomination review added under Landmark duties. CLG requirements added to Historic Preservation in San Francisco. References to specific bulletins removed.		
	Incentives				
90.	Incentive results such as quality rehab and long-term protection (easements) should be described	NTHP	Revisions made.		
91.	Local incentives, and not just financial, should be briefly described	NTHP	See comment 90.		
92.	Track changes – include more info about incentives, delete reference to specific bulletin	Shanahan	See comment 90.		
	Objective 1 MAINTAIN AN INVENTORY OF HISTORIC RESOURCES EVALUATED AS SIGNIFICANT TO SAN FRANCISCO’S BUILT ENVIRONMENT.				
93.	Change title to “Maintain a Complete Inventory of Historic Resources”	NTHP	Revision made.		
94.	Comments also from Historic Resource Survey Program section apply	NTHP	Revision made.		
95.	Track changes: typo and delete “credit” after tax because Mills Act isn’t a credit	Damkroger	See comment 75.		
96.	Relates to Objective 5, should be blended or matched better	P&T	Intent of comment not understood by reviewers.		
97.	Track changes – various edits, discuss context-based survey	Shanahan	Revisions made.		
	• Policy 1.1 Undertake a citywide survey and evaluation of privately and publicly owned structures and sites forty-five years old or older, and conduct periodic updates of the survey.				
98.	Edit: <i>Policy 1.1: Undertake a citywide survey and evaluation of privately and publicly owned structures and sites historic resources forty-five years old or older, and conduct periodic updates of the survey.</i>	NTHP	Revision made.		
99.	Edit “one approach” passage to explain other approaches	NTHP	Revision made.		
100.	Implementation language should match Policy statement re: context-based	NTHP	REVISION MADE TO IMPLEMENTATION MEASURES.		
101.	Add sentence at end stating “City is committed to generating a complete citywide survey of historic resources”	NTHP	Revision made.		
102.	Add language to prioritize survey: areas or resource types that are at risk, underrepresented, or under recognized	NTHP	Revision made.		
103.	Track changes – do sites include landscapes?	FOMC	Revised to “historic resources” to be inclusive.		
104.	Track changes – implementation should include cooperation with	Damkroger	REVISION MADE TO		

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	private and neighborhood groups		IMPLEMENTATION MEASURES.		
105.	Track changes – remove reference to age (45 years old) and base significance on historic context	OHP	ARG agrees with the city. The survey methodology is to look at age eligible properties: this proposal would substantially burden the survey process. Statement about exceptional properties under 45 years of age included.		
106.	Track changes – various additions and edits, discussing specific plan of action for citywide survey; re-write last paragraph	Shanahan	Revisions made.		
	<ul style="list-style-type: none"> Policy 1.2 Prepare a citywide historic context statement to inform an overall understanding of San Francisco’s built environment. 				
107.	Edit: <i>Policy 1.2: Prepare a citywide context statement to inform an overall understanding of San Francisco’s historic built environment.</i>	NTHP	Revision made.		
108.	New paragraph suggested – see page 5 of NTHP comments	NTHP	Revisions made.		
109.	This should be Policy 1.1	NTHP; Shanahan	Revision made.		
110.	Track changes – edit Policy statement to make clear that thematic (discontiguous districts) are also recognized	Damkroger	ARG agrees with City. This is done through the phrase “and/or historical context” and references to themes in the narrative of the policy.		
111.	Implementation should include outreach programs and include discussion of new Planner position	Comm. Mtng.	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
112.	Track changes – edits and add reference to neighborhood surveys	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	<ul style="list-style-type: none"> Policy 1.3 Collect and evaluate information about areas with concentrations of historical resources that share physical qualities and/or historical context. 				
113.	Suggest re-wording as “potential historic or conservation district”	NTHP	Revisions made.		
114.	Clarify what constitutes a historic district in the Policy statement	NTHP	Revisions made.		
115.	Explain why it is important to identify districts as opposed to individual buildings and how districts benefit preservation efforts	NTHP	Revisions made.		
116.	Track changes – add reference to open spaces	FOMC	Reference to cultural landscapes added.		
117.	Track changes – edits, word choice, add reference to area context statements	Shanahan	Revisions made where appropriate. See comment 112.		
	<ul style="list-style-type: none"> Policy 1.4 Encourage private developers and property owners to assist in the identification of historic resources. 				
118.	Suggests new language for Policy: “Encourage property owners and development interests to undertake identification and evaluation of historic resources to streamline environmental review processes and take advantage of preservation incentives.”	NTHP	Revision made.		

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119.	Add more information about how the City would encourage this outside of Institutional Master Plans	NTHP	Revision made. ALSO ADDED TO IMPLEMENTATION MEASURES.		
120.	Clarify the IMP process	P&T			Planning Dept. Input needed.
121.	Require that City projects also document resources	P&T	Policy added.		
122.	Track changes – require this instead of encourage, evaluations should be done by Planning or by consultants independent from developers, but paid for by private owners/developers	Shanahan	Suggested edits would change the meaning of the policy. Information added to implementation under Policy 2.1		
	<ul style="list-style-type: none"> • Policy 1.5 Recognize historic resources of exceptional importance that are less than fifty years old. 				
123.	Needs more explanation about why it is important	NTHP	Revisions made.		
124.	Explain 50 year rule and criteria to determine exceptional importance	NTHP; Comm. Mtng.	Revisions made.		
125.	Mention reasons for significance such as architecture and work of master	NTHP	Revision made.		
126.	Track changes – conflicts with Policy 1.1	OHP	Made consistent with Policy 1.1		
127.	Track changes – context statement will include properties less than 50 years old to aid in this	Shanahan	Revision made.		
	Additional Policies suggested under Objective 1:				
128.	<ul style="list-style-type: none"> • Commit to listing eligible properties on California Register and National Register and to designating SF Landmarks 	NTHP	Revision made to Policy 2.5.		
129.	<ul style="list-style-type: none"> • Identify and evaluate significant interiors in public buildings or in publicly accessible private buildings 	NTHP	Added Policy 2.4b		
130.	<ul style="list-style-type: none"> • Identification, evaluation, and designation of resources associated with diverse or underrepresented populations, communities, themes, or resource types will be a priority in the survey program. 	NTHP	Added Policy 1.6		
131.	<ul style="list-style-type: none"> • The Department shall maintain online and at the Planning Information Center the comprehensive Historical Context Statement for San Francisco, including architectural periods and styles, and the various area specific context statements, as they may be changed from time to time. 	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
132.	<ul style="list-style-type: none"> • Track changes: three additional policies 	Shanahan (p. 19)	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
133.	<ul style="list-style-type: none"> • Require City agencies to survey their own properties 	Shanahan	Revision made.		
	Objective 2 PROTECT AND PRESERVE HISTORIC RESOURCES.				
134.	Add language about why preserving historic resources is in the public interest (physically links us to our past; contributes to the distinctiveness	NTHP; Shanahan	Revisions made.		

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	of our community character and unique sense of place; honors and helps us understand the events, people and ways of life that came before us); tourism, sustainability				
135.	Specify that members of the general public and diverse constituencies are encouraged to participate in the process	NTHP	Revision made.		
136.	Track changes – add “landscapes”	FOMC	“Buildings” changed to “historic resources.”		
137.	First sentence, replace “important” with “integral”	Heritage	Revision made.		
	<ul style="list-style-type: none"> • Policy 2.1 Protect individually designated buildings and other historic resources. 				
138.	Edit: <i>Protect individually locally, state, or nationally designated buildings and other historic resources.</i> ; track changes –add “landscapes”	NTHP; FOMC	Revisions made including changing “buildings” to “historic resources.”		
139.	Provide more information about how SF protects historic resources as a CLG in relation to General Plan, Articles 10&11, CEQA and Sect. 106	NTHP	Covered in Legal Basis section		
140.	Define “individually designated” and different listing programs	NTHP	The term is self explanatory. Not necessary to define.		
141.	Clearer explanation of what “protection” entails	NTHP	REVISION MADE TO IMPLEMENTATION MEASURES.		
142.	Add detail about how and where preservation should be integrated with other land use laws	NTHP	Revisions made.		
143.	Wording not strong enough, implies demolition is at top of the list, also should include inappropriate alterations	Comm. Mtng.	Revision made.		
144.	Track changes – add reference to Policy 2.2 open space	FOMC	Language changed to “historic resources” which includes cultural landscapes. Separate policy not needed.		
145.	Track changes – add “inappropriate alterations” and other edits	Shanahan	Revisions made.		
	<ul style="list-style-type: none"> • Policy 2.2 Protect groupings of historic resources that are formally listed as historic or conservation districts. 				
146.	Edit: Protect <u>locally, state, or nationally designated groupings of historic resources that are formerly listed as historic or conservation districts.</u>	NTHP	Revision made.		
147.	State that projects within districts will be reviewed with the Secretary’s Standards	NTHP	Revision made.		
148.	Discuss differences in reviewing projects within districts versus individual resources; are there more tools that could be applied or improved?	NTHP	REVISIONS MADE TO IMPLEMENTATION MEASTURES.		
149.	Discuss how development within districts will be consistent with character; recommend developing design guidelines as part of	NTHP; Damkroger	REVISIONS MADE TO IMPLEMENTATION MEASTUERS.		

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	implementation				
150.	Track changes – add “and landscape”	FOMC	Revision made.		
151.	Track changes – address lowering height limits within historic districts to prevent inappropriate additions	Shanahan	This suggestion is not consistent with other model elements.		
	<ul style="list-style-type: none"> • Policy 2.3 Protect resources that, based on professional evaluation, appear eligible for formal designation individually or as part of a grouping. 				
152.	Opening language confusing, makes it sound like unidentified resources are all unattractive, should be clear that just not surveyed/identified yet	NTHP			
153.	Elaborate on guidelines used to identify un-rated resources; any guidelines outside of CEQA?	NTHP	ARG agrees with City comments that it is best not to go into those details since the Element would need to be amended every time guidelines were updated. Reference bulletin on CEQA in implementation.		
154.	Track changes – add “or in terms of landscapes”	FOMC	Language changed to be broader.		
155.	Track changes - note Standards for Landscapes in Implementation	FOMC	CEQA covers historic resources, which includes cultural landscapes. No change made.		
156.	Track changes – edits, new language re: CEQA and staff training	Shanahan	Revisions made except comment regarding department’s CEQA guidelines, which are addressed in Bulletin 16: CEQA Review Procedures. Staff training not found in other cities’ model preservation elements..		
	<ul style="list-style-type: none"> • Policy 2.4 Protect historic resources that are less than fifty years old. 				
157.	Policy should be re-framed to address recent past, including properties over 50 years old, concern about modern materials is similar in 1930s and ‘40s era properties	NTHP; Comm. Mtng.	Revisions made.		
158.	Are there policies the City could implement to encourage greater identification of resources from the recent past?	NTHP	Dealt with in citywide context statement and Policy 1.4.		
159.	Track changes – add “cultural landscapes”	FOMC	Revisions made including changing “architecture” to “historic resources.”		
160.	Should indicate basis for training; note the NR Bulletin re: Preserving the Recent Past	P&T	Too specific for a preservation element.	NPS, Cultural Resource Management, “Preserving the Recent Past.” Collection of essays on recent past—not guidelines.	
	<ul style="list-style-type: none"> • Policy 2.5 Support efforts to pursue formal designation of properties 				

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	determined eligible for listing as City Landmarks or City Historic Districts under Article 10 of the Planning Code.				
161.	Track changes – remove reference to Bulletin 5	Shanahan	Revisions made. Reference to bulletins generalized.		
	• Policy 2.6 Encourage the rehabilitation and adaptive use of historic buildings and other historical resources as an alternative to demolition.				
162.	Edit last sentence: “Such treatment options may also avoid an adverse impact to the property and could therefore negate the need for an Environmental Impact Report as an historic resource under the California Environmental Quality Act (CEQA).”	City Attorney	Revision made.		
163.	Edit Implementation: “If so, a project may be exempt from further environmental review. . .”	City Attorney	Revision made.		
164.	Outline benefits of rehab and explain why city supports it	NTHP	Revisions made.		
165.	Reference environmental sustainability	NTHP	Revisions made.	See 164.	
166.	Discuss livability and sense of place supported by reuse	NTHP	Revisions made.	See 164.	
167.	Discuss incentives for adaptive reuse such as Federal Rehab tax credit	NTHP	Discussed in incentives		
168.	Use a stronger word than “encourage” in Policy	Comm. Mtng.	Revision made.		
169.	What would justify demolition of a historic resource?	Comm. Mtng.	ARG agrees with City comments. There is no general rule that would cover all situations and should be dealt with on a case-by-case basis. No changes made.		
170.	Expand narrative, include discussion of intrinsic value of a building	Comm. Mtng.	Revision made.		
171.	Remove the words “whenever possible”	Comm. Mtng.	Revision made.		
172.	Note that replacement materials are expensive	Comm. Mtng.	Comment not addressed in this policy. Economic benefits of preservation covered in Benefits section.		
173.	Define “demolition”	P&T	Comment not addressed in this policy but addressed in glossary		
174.	Track changes – various edits, reference SIS	Shanahan	Revisions made.		
	• Policy 2.7 Use enforcement powers to prevent demolition by neglect.				
175.	Enforcement also needed for unauthorized alterations, etc...	Comm. Mtng.	Revisions made.		
176.	Is there a way to apply to cultural landscapes?	FOMC	See Policy 2.10.		
177.	Implementation should include evaluation of penalties, making sure penalties deter violations	Damkroger	REVISION MADE TO IMPLEMENTATION MEASURES.		
178.	Track changes – move implementation into Policy narrative	Shanahan	REVISION MADE TO IMPLEMENTATION MEASURES.		
	• Policy 2.8				

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	Demonstrate leadership through the preservation, rehabilitation and adaptive use of publicly owned historic resources.				
179.	Edit to policy statement: replace “publicly” with “City” owned	NTHP	Revision made.		
180.	Include more demonstration of commitment through systematic survey of City-owned resources, or consider putting covenants on properties transferred out of City ownership	NTHP	REVISION MADE TO IMPLEMENTATION MEASURES.		
181.	Track changes – insert “designation” in Policy	Damkroger	Revision made.		
182.	Track changes – Edit Policy statement and add requirement for LPAB review, statement about Element	Shanahan	Revisions made.		
	• Policy 2.9 Foster inter-agency communication and collaboration on projects with historic preservation aspects or impacts.				
183.	City planning staff should provide guidance, model policies, and technical assistance to agencies outside jurisdiction	NTHP	Revisions made.		
184.	Emphasize the need for this re: landscape preservation	FOMC	Historic resources includes landscapes.		
185.	Track changes – move implementation into Policy	Shanahan	Combined with NTHP revisions.		
	• Policy 2.10 Recognize and protect non-architectural historic resources.				
186.	Edit: <i>Recognize and protect historic structures, objects, sites, landscapes, and cultural landscapes non-architectural historic resources.</i>	NTHP	ARG agrees NTHP that these property types are represented in the definition of a “historic resource” and a separate policy gives these appearance that these resources are secondary to buildings. POLICY DELETED.		
187.	Use NR and CR terms, and provide examples of each	NTHP	POLICY DELETED.	See 186.	
188.	Explain why it is a necessary distinction for this Policy, may give the appearance that other resources are secondary to buildings	NTHP	POLICY DELETED.	See 186.	
189.	Address infrastructure and transportation resources	Comm. Mtng.	POLICY DELETED.	See 186.	
190.	Track changes – add Rec and Park to implementation	FOMC; Damkroger	POLICY DELETED.	See 186.	
191.	“Non-architectural” is awkward	OHP	POLICY DELETED.	See 186.	
192.	Track changes – move implementation into Policy narrative	Shanahan	POLICY DELETED.	See 186.	
	• Policy 2.11 Collect, archive, maintain, and protect documents and artifacts that are important to the historical understanding of San Francisco’s built environment.				
193.	Recommend separate policy re: public accessibility to information	NTHP	Reviewers appeared to have misunderstood the intent of this policy, which refers to the protection of actual documents and artifacts, not the data collected as part of preservation efforts such as surveys. “Historic Resources” include buildings, structures, sites, objects, and cultural landscapes but not moveable artifacts. Public access to survey information addressed under Policy 1.7.		

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194.	Include discussion of CHRID	NTHP	Too specific for preservation plan		
195.	Track changes – add implementation about working with other departments to gather info about history of SF cultural landscapes	FOMC	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
196.	Add info about how this will be done, and who will have access to the information	P&T	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
197.	Track changes – move implementation into Policy	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	New Policies suggested under Objective 2:				
198.	<ul style="list-style-type: none"> Four new policies suggested 	Shanahan, p. 21	ARG agrees with City that these work better as implementation than a policy. REVISIONS MADE TO IMPLEMENTATION MEASURES		
199.	<ul style="list-style-type: none"> Two new policies suggested 	Shanahan, p. 25	ARG agrees with City that these work better as implementation than a policy. REVISIONS MADE TO IMPLEMENTATION MEASURES		
	Objective 3 PRESERVE ARCHEOLOGICAL RESOURCES WITHIN SAN FRANCISCO AS A UNIQUE, IRREPLACEABLE RECORD OF THE PAST				
200.	Different voice from other Objective sections – should be more concise: also Opposite comment that all of Element should be in this voice	Comm. Mtng.; NTHP	Revisions made where appropriate.		
201.	Edit: drop the apostrophe in “It’s archeological” (second sentence)	Cherny	Revision made.		
202.	Amazing objective, model for other local gov’ts	OHP	No change required.		
203.	Track changes – edits and additional language	Shanahan	Revisions made.		
	<ul style="list-style-type: none"> Policy 3.1 Develop and maintain an archeological GIS (Geographic Information System) of known and expected archeological resources and of their associated documentation. 				
204.	GIS should also be used for historic resources inventory, per Objective 1	P&T	See comment 23.		
205.	Track changes – edits and additional language	Shanahan	Implementation measure kept separate.		
	<ul style="list-style-type: none"> Policy 3.2 Ensure preservation or appropriate treatment of inadvertently discovered archeological resources. 				
206.	Track changes – edit Policy Statement and move implementation into Policy narrative	Shanahan	Implementation measure kept separate.		

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	<ul style="list-style-type: none"> Policy 3.3 All Indigenous archeological sites in San Francisco shall be treated as having prima facie significant archeological value. 				
207.	Implementation should include consultation with tribal representatives	OHP	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
208.	“Prima facie” should be defined	P&T	Revision made.		
209.	Track changes – edit to Policy Statement, move implementation into Policy narrative	Shanahan	Revision made.		
	<ul style="list-style-type: none"> Policy 3.4 Create archeological preservation districts to preserve multiple-feature archeological resources that are prehistorically, historically, or thematically interrelated. 				
	<ul style="list-style-type: none"> Additional Policies suggested under Objective 3: 				
210.	Incorporate archeological resources in the City’s survey and preservation planning efforts	NTHP	Revision made to Policy 3.0.		
211.	Public education program	NTHP	Implementation measure.		
	Objective 4 ENSURE THAT CHANGES IN SAN FRANCISCO’S BUILT ENVIRONMENT RESPECT THE HISTORICAL CHARACTER AND HERITAGE OF THE CITY.				
212.	Explain why the Secretary’s Standards are being adopted	NTHP	Revision made.		
213.	Track changes – include Standards for Cultural Landscapes	FOMC	Revision made.		
214.	Track changes – numerous edits that change the tone and meaning of the Objective	Shanahan	Revisions made in part.		
215.	Clarify statements about “compatibility” and use stronger language about high-quality, contemporary design, and need to differentiate existing from new construction	Heritage	Revision made.		
	<ul style="list-style-type: none"> Policy 4.1 Apply the nationally established Secretary of the Interior’s Standards for the Treatment of Historic Properties for all projects that affect known or potential historic resources. 				
216.	Edit Implementation – delete last sentence (“In order to codify . . .”); Article 10 is separate from CEQA procedures, but a policy could be drafted to specify that properties designated under Article 10 would be subject to review under the Standards.	City Attorney	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
217.	Term “strategies” should be changed to “treatments”	NTHP	Revisions made.		
218.	Track changes – add Standards for Cultural Landscapes to Policy title and to implementation	FOMC	“Historic resources” includes cultural landscapes. SIS Standard’s for the Treatment of Historic Resources includes cultural landscapes. Specific guidelines not mentioned.		

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219.	Don't believe SIS are being applied well, not adequate, disagree with implementation to codify their use	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	<ul style="list-style-type: none"> Policy 4.2 Apply the Secretary of the Interior's Standards for the Treatment of Historic Properties for infill construction in known or potential Historic Districts or Conservation Districts to assure compatibility with the character of the districts. 				
220.	Same edit as per Policy 4.1 (City Attorney)	City Attorney	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
221.	Track changes – add Standards for Cultural Landscapes to implementation	FOMC	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
222.	Don't believe concern re: "false historicism" is valid, that it prevents compatible new construction, same comments re: SIS as per Policy 4.1	Shanahan	Revisions made.		
	Objective 5 INCORPORATE PRESERVATION GOALS INTO THE LAND USE DECISION-MAKING PROCESS.				
223.	Suggest edit to second sentence: replace "consider the impact" with "consider the importance"	NTHP	Revision made.		
224.	Track changes – edits, change from "should" to "shall"	Shanahan	Revision made.		
	<ul style="list-style-type: none"> Policy 5.1 Maintain a qualified governing body to oversee City preservation actions. 				
225.	Should include specialists in historic landscape design/interest in preserving cultural landscapes, (see also track changes)	FOMC	Revisions made.		
226.	Track changes – implementation to <i>determine best means</i> to convert Board to Commission (rather than "consider")	Damkroger	Language regarding Commission added.		
227.	Should note the qualifications for each specialty	P&T	ARG agrees with City. The list would be too detailed and might exclude cultural landscape experts.		
228.	Track changes – move implementation into Policy, with edits	Shanahan	Revisions made.		
	<ul style="list-style-type: none"> Policy 5.2 Maintain a City staff of qualified preservation professionals. 				
229.	Should include specialists in historic landscape design/interest in preserving cultural landscapes, (see also track changes)	FOMC	Omitted because there are no Secretary of the Interior's Standards for cultural landscape professionals.		
230.	Track changes – edits, training for all planners	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	<ul style="list-style-type: none"> Policy 5.3 				

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	During the planning process, evaluate the significance of resources that have the potential to be designated individually or as part of a grouping, per the guidelines set forth in Preservation Bulletin No. 16 CEQA Review Procedures for Historic Resources.				
231.	Edit: <i>During the planning process, evaluate the significance of potential historic resources that have the potential to be designated individually or as part of a grouping, per the guidelines...</i>	NTHP	Revision made.		
232.	Specify what types of planning processes this applies to	NTHP	Covered under discussion of Legal Basis.		
233.	Does not specify how Planners reach determinations	P&T	ARG agrees with City, bulletin more appropriate location for technical information.		
234.	Track changes – Edits to remove references to Bulletin 16 and move implementation into Policy	Shanahan	Shanahan comments combined with NTHP. Revisions made.		
	• Policy 5.4 Ensure that historic resource surveys are an integral component of long-range planning and Area Plan efforts.				
235.	Well-written, strong policy	P&T			
236.	Track changes – edits, add statement about designation	Shanahan	Revisions made.		
	• Policy 5.5 Include Historic Preservation Policies in all Area Plans.				
237.	Include general statement about what types of planning considerations a Preservation policy would address as part of an area plan	NTHP	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
238.	Track changes – move implementation into Policy	Shanahan	Revisions made.		
	• Policy 5.6 Consider information about historic resources, as well as the objectives and policies of this Element, in the development of zoning regulations and other regulatory policies.				
239.	Track changes – numerous edits	Shanahan	Revisions made in part.		
	• Policy 5.7 Periodically review historic preservation procedures and guidelines related to CEQA, Section 106, and Articles 10 and 11, and update as needed.				
240.	Track changes – edits	Shanahan	Revisions made.		
	• Additional Policies:				
241.	City will ensure consistency between the Preservation Element and all other General Plan Elements, including subsequent updates	NTHP	Consistency between all General Plan Elements is a goal of the City.		
242.	Add a policy or implementation to amend Article 10 and 11 to allow certain minor projects that meet SIS to be approved by staff rather	Damkroger			Planning Dept input needed.

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	than come before the LPAB.				
	Objective 6 ENCOURAGE HISTORIC PRESERVATION THROUGH INCENTIVE PROGRAMS.				
243.	Track changes – add “cultural landscapes”	FOMC	Revised to “historic resources.”		
244.	Needs elaboration, describe other benefits, Section 209.9(e), also include under Policy 5.6	P&T	Revisions made.		
	• Policy 6.1 Encourage the use of grants, loans, tax mechanisms, or other funding sources for the preservation of historic resources.				
	• Policy 6.2 Educate San Francisco’s decision makers, business leaders, neighborhood groups, and residents about the economic benefits of historic preservation.				
245.	Consider removing or restructuring statement about designation increasing property values, providing supporting information	NTHP	Removed sentence.		
246.	Track changes – mention website in Policy narrative	Shanahan	Revision made.		
	• Policy 6.3 Promote public awareness of the State Historic Building Code.				
247.	Add statement about the City using and promoting the SHBC	NTHP	Revision made.		
248.	Use code language to define SHBC, (example given – p.11 of comments)	NTHP	Revision made.		
249.	Track changes – move end of narrative to the beginning, other edits re: increasing use of the SHBC	Shanahan	Combined with comments from the NTHP.		
	• Additional Policies:				
250.	Are there other incentives the City could offer besides financial? Such as streamlined review processes, etc...	NTHP	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	Objective 7 FOSTER PUBLIC AWARENESS AND APPRECIATION OF SAN FRANCISCO’S HISTORIC RESOURCES.				
251.	Track changes – add “cultural landscapes”	FOMC	Revision made.		
252.	Role of Preservation Tech Specs should be better defined	P&T	Contradicts comments of other reviewers. Change not made.		
253.	TDRs not mentioned in Policy 5.6 or in Objective 7	P&T	Added to 6.1		

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	<ul style="list-style-type: none"> • Policy 7.1 Promote awareness among the public, including visitors, about historic resources in San Francisco. 				
254.	City should work with local groups to develop heritage tourism products and promote heritage tourism	NTHP	Revisions made to policy and/or implementation measures.		
255.	Can information also be disseminated through workshops?	NTHP	Revision made to policy and/or implementation measures.		
256.	Importance of tourism to economy, work with Convention and Visitors Bureau, include more outreach strategies	Shanahan	Covered under Objective 7 and implementation measure.		
	<ul style="list-style-type: none"> • Policy 7.2 Encourage public participation in identification of potential historic resources. 				
257.	Include language about outreach to diverse communities	NTHP	Revision made.		
258.	Include information about mechanisms for the public to submit information	NTHP	Comment addressed in Implementation.		
259.	Consider providing training for lay people to complete DPR 523 forms	NTHP	ARG agrees with City's comment that City staff constraints make this unlikely.		
260.	Track changes – add “cultural landscapes”	FOMC	Changed to “resources” which includes cultural landscapes.		
261.	How will the Planning Department encourage public to submit information	P&T	Comment addressed in Implementation.		
	<ul style="list-style-type: none"> • Policy 7.3 Encourage activities that foster awareness and appreciation of historic events and resources. 				
	<ul style="list-style-type: none"> • Additional Policies: 				
262.	Include policy about public accessibility to information (CHRID) – comment also from Policy 2.11	NTHP	CHRID too specific and not mentioned in the Cal Statewide PP. REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	Objective 8 PROMOTE THE PRINCIPLES OF SUSTAINABILITY FOR THE BUILT ENVIRONMENT THROUGH THE INHERENTLY “GREEN” STRATEGY OF HISTORIC PRESERVATION.				
263.	Edit: <i>Promote <u>Historic Preservation as a Key Strategy in Adhering to the Principles of Sustainability for the Built Environment through the Inherently “Green” Strategy of Historic Preservation.</u></i>	NTHP	Revision made.		
264.	Suggests replacement Objective statement, p. 12 of comments	NTHP	Revision made.		

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265.	Track changes – edits, more details	Shanahan	Language changed per NTHP comments and edits are no longer applicable.		
	<ul style="list-style-type: none"> Policy 8.1 Encourage sustainability of historic resources consistent with the goals and objectives of the Sustainability Plan for the City and County of San Francisco. 				
266.	Edit: <i>Promote Encourage sustainability of preservation, rehabilitation, and adaptive reuse of historic resources as a sustainable practice consistent with the goals and Objectives of the Sustainability Plan for the City and County of San Francisco.</i>	NTHP	Revision made.		
267.	Clarify that rehab is preferable to salvage, not equal	NTHP	Revision made.		
268.	Specify LEED standards	NTHP, P&T	Addressed in Implementation		
269.	Use term “sustainable” instead of “green”	NTHP	“Green” revised to “sustainable” where appropriate.		
270.	Implementation should include update to Sustainability Plan to recognized historic preservation as an important tool	NTHP	Revision made.		
271.	Implementation could include developing a salvage program and partnering on LEED programs	Damkroger	Addressed in implementation.		
272.	Track changes – edit, move implementation into Policy	Shanahan	Revision made.		
273.	Add more details about embodied energy, directly reference the recommendations of the Mayor’s Task Force on Green Building	Heritage	Language changed per NTHP		
	New Policies suggested:				
274.	<ul style="list-style-type: none"> Develop program with Dept. of the Environment.... 	Shanahan, p. 40-41	Addressed in Implementation.		
275.	<ul style="list-style-type: none"> Discourage use of vinyl windows 	Shanahan, p 41	Addressed in Implementation		
	Objective 9 PREPARE HISTORIC RESOURCES FOR NATURAL OR OTHER DISASTERS AND DEVELOP EMERGENCY PREPAREDNESS AND RESPONSE PLANS THAT CONSIDER THESE RESOURCES.				
276.	Edit: <i>Prepare Historic Resources for Natural or Other Disasters ...</i>	NTHP	Revision made.		
277.	Address emergency preparedness and care for parks during emergencies, plan for preservation of cultural landscapes (see also track changes under Policy 9.2)	Comm. Mtng.; FOMC	Cultural landscapes included in “historic resources.”		
	<ul style="list-style-type: none"> Policy 9.1 Preserve, consistent with life safety considerations, the architectural character of buildings and structures important to the unique visual image of San Francisco, and increase the 				

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	likelihood that architecturally and historically valuable structures will survive future earthquakes.				
278.	Edit: replace “earthquakes” with “disasters”	NTHP	9.1 is specifically for earthquakes and 9.2 covers all disasters.		
279.	Places undue emphasis on “visual” aesthetic value of resources	NTHP	Revision made.		
280.	Language should take into account other disasters besides earthquake and fire	NTHP	Policy 9.2 does this.		
281.	Track changes – move implementation into Policy	Shanahan	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
	<ul style="list-style-type: none"> • Policy 9.2 Ensure that historic resources are protected in the aftermath of a disaster. 				
282.	Track changes – passage about parks used as housing during emergencies, protecting parks from harm caused by such use	FOMC	Revision made in part.		
283.	Track changes – involve Office of Emergency Services, Rec and Park, and DPW in implementation coordination	FOMC	REVISIONS MADE TO IMPLEMENTATION MEASURES.		
284.	Track changes – note that Hurricane Katrina in 2005 is the reason New Orleans is mentioned; example does not clarify post-disaster assessment process	Damkroger; P&T	Revision made.		
285.	Track changes – move implementation into Policy	Shanahan	City staff consulted, and implementation measures will be a separate document.		
	Glossary				
286.	Important to meanings of objectives and policies, should be included in the Draft	Shanahan	Revision made.		