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13 March 2023

Gabriela Pantoja, Senior Planner
San Francisco Planning Department
49 South Van Ness Avenue,
Suite 1400
San Francisco, CA 94103

Re: 369 Valley Street, Earthquake Cottage
Concerns on Variance Application

Dear Gabriela:

We reviewed the latest documents, as noted below, including the latest submitted plans, dated 17 February 2023, from the project sponsor and the only substantive change seems to be that the "Scope of Work" now states that the Earthquake Shack Cottage will be raised seven (7) feet from its current elevation. There appears to be no complete formal response to the concerns and issues that have been raised.

Your Plan Check Letter #2, dated 15 February, 2023, requested several changes be made to the project sponsor's "Historic Preservation and Relocation Plan," dated April 2020. The revised submittal, dated February 2023, shows minimal if any changes (maybe just the date?) in response to your letter.

1. You requested that the project sponsor include a "Historic Preservation architect or engineer" in their planning. The project sponsor provided no additional information as to whether they have engaged such an experienced professional to guide them.
2. You requested that the project sponsor "Specify exact relocation depth." The project sponsor provided additional information but we believe they have come up short in responding to your request. The new plan still continues to state exactly what the 2020 plan said, the Earthquake Shack Cottage will be moved "**approximately** 13 feet north, 20'-0" from the northern edge of the project parcel... [and] **approximately** 3' above existing parking pad [emphasis added]."
3. You requested that the project sponsor "Provide specifications for the building location" during the move. The project sponsor provided no additional information as to how they plan on keeping the existing historic structure out of the way, where it will be stored during construction, protecting it during the full schedule of the proposed work, and how it will be moved into position. We would expect that the Plan would clearly identify the scope that might have a potential impact on the historic resource and how to minimize or eliminate the potential impact.

4. You requested that the project sponsor "Indicate experience relocating historic buildings" regarding "SOLARES House Movers." The project sponsor provided no additional information as to the level of experience of the proposed house movers.
5. You requested that the project sponsor "Provide note that the SF Planning Department will be contacted in the event that additional building materials require repair..." The project sponsor provided no additional information in response as to how they will respond to possible increase in scope based on existing uncovered conditions.

We feel that the project sponsor does not seem to be fully engaged in trying to respond to your straightforward requests for additional information/clarification. With this seeming resistance to providing responses we feel that the Planning Department staff should reject the project sponsor's latest "Historic Preservation and Relocation Plan." In addition their Plan is not referenced into the building permit set - thus there is NO guarantee that the document becomes part of the actual issued building permit. The inspector will not be aware of it - thus there will be no monitoring of proper preservation procedures during construction.

Our main concern is that the project proposes to raise the historic Earthquake Shack Cottage up to a height that completely changes the massing and historic relationship between the existing floor level and the sidewalk/street. This will make the resulting building almost unrecognizable as an Earthquake Shack Cottage. These buildings were built as one-story structures. Converting it into what appears to be a two-story building destroys one of the primary character-defining features of the historic resource. We believe that, if the project sponsor does not modify the proposed scope of work, there should be a full environmental review. At present there is no CEQA exemption in place.

Further, we believe that a genuine preservation plan would include:

- The inclusion of a preservation architect as part of the project team.
- The inclusion of a structural engineer with experience working with historic structures.
- A building mover with experience in moving historic structures.
- A complete Protection Plan of where and how the Earthquake Shack Cottage will be stored while the new structure underneath it is built.
 - the plan should also identify how the Earthquake Shack Cottage will be protected from vandalism, and the elements while it is being stored.
 - the plan should also limit the use of heavy equipment around the historic structure minimally necessary to excavate for the proposed foundation.
- A complete description of the rehabilitation work that needs to occur on the cottage to protect and retain as much historic fabric as possible.
- Identify the need for monitoring of the project by Planning Department staff.
- An acknowledgement that the project sponsor & owner will have all work be compliant with the Secretary of the Interior's Standards for Rehabilitation while utilizing the California Historical Building Code.

We also note that Marc Norton met with the project sponsor on February 13, 2023. At that meeting, the project sponsor agreed to consider an alternative draft building plan that GA, Inc. suggested, which would leave the Earthquake Shack Cottage in its current

location. Mr. Norton submitted that draft building plan to the project sponsor on February 16. Mr. Lannoye, the project architect, initially indicated, "We are open to most of your suggestions, but need to study them a little closer..." Despite repeated inquiries from Mr. Norton, no further communication was received from the project sponsor regarding the alternative draft building plan.

The latest notice is that this project is scheduled for a Variance Hearing on March 22. It seems odd that a Variance Hearing has been scheduled when there appear to be some outstanding preservation issues surrounding the relocation of the historic structure on this property. A petition dated February 14th, 2023 it was the sentiment of all of the adjacent neighbors are opposed to the possibility of granting a variance for the current proposed project.

We look forward to possibly discuss the above concerns with you and hope that further progress can be made on resolving the issues that have been raised.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Garavaglia". The signature is stylized with a large, looping "G" at the end.

Michael Garavaglia, AIA LEED AP BD+C
President
Garavaglia Architecture, Inc.

file: 230313-369-GA letter to Planning.docx