

D. CULTURAL AND PALEONTOLOGICAL RESOURCES

This section of the EIR discusses the potential impacts to cultural and paleontological resources that would result from the proposed project. For the purposes of this analysis, cultural resources are defined as both prehistoric and historic-period archaeological resources as well as historic-period (generally 50 years in age or older) buildings, structures, and districts. This section describes the historic setting, previously-identified cultural resources, and cultural resources identified through the course of this analysis within the project area. All applicable federal, state and local regulations for the proposed project are also presented and impacts and recommended mitigation and improvement measures are discussed.

Except where otherwise noted, this section is based on the following: (1) the Historic Resources Evaluation (HRE) prepared by Knapp Architects¹; (2) the National Register of Historic Places (NRHP) Nomination prepared by Page & Turnbull Inc.²; (3) the Historic Resources Evaluation Response (HRER) prepared by the San Francisco Planning Department.³; and the MEA Preliminary Archaeological Review Checklist.⁴

SETTING

The following setting sections outline the background for the resources that were surveyed to determine whether they were present within the project site. Resources previously identified or identified through the course of this proposed project analysis were evaluated to meet specific significance criteria outlined in the subsequent Regulatory Setting section. Only resources that meet the aforementioned criteria are considered for potential project impacts.

PREHISTORIC SETTING

Indigenous peoples have likely occupied the Bay Area since the late Pleistocene. Little evidence for this occupation has been found. However the oldest evidence for humans in the City of San Francisco was

¹ Knapp Architects, 2009, *Historic Resource Evaluation Report Fairmont Hotel 950 Mason Street*, August. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

² Page & Turnbull, 2001, *National Register of Historic Places Nomination prepared by Carolyn Kiernat*. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

³ San Francisco Planning Department, 2010, *Historic Resource Evaluation Response: 950 Mason Street: The Fairmont Hotel*, March 12. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

⁴ San Francisco Planning Department, 2009, *MEA Preliminary Archaeological Review Checklist: 950 Mason Street: The Fairmont Hotel*, December 16. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

found approximately 75 feet below the modern ground surface (CA-SFR-28), during the construction of the Bay Area Rapid Transit (BART) tunnel at the western end of the Downtown District (Civic Center BART), and estimated to be approximately 5,000 years old. The majority of known prehistoric-era sites in the City of San Francisco are no more than 2,000 years old, and are found buried at depths of approximately 10 to 20 feet below ground surface along the margins of the bay and in the South of Market area. Few prehistoric sites are documented in the interior part of the City. It is not clear whether this is a reflection of prehistoric-era settlement preferences, lack of systematic archaeological investigation, or a combination of changes of landscape over time that have buried or otherwise obscured resources, coupled with a lack of excavation to depths likely to reveal any such buried resources.

While systematic surveys conducted in the early 20th century by N. C. Nelson resulted in the documentation of 425 shellmounds adjacent to the Bay, his survey occurred well after Yerba Buena Cove had been filled and the area heavily developed by the built environment.

Terminal Pleistocene (13,500–11,600 BP)

No prehistoric sites dating from this period have as yet been discovered in the San Francisco Bay Area. The nearest Terminal Pleistocene site is the Borax Lake site (CA-LAK-36). Assumedly populations were small and highly mobile. The archaeological signature of such groups would be faint and geographically sparse and easily disturbed by geological processes such as erosion, rising sea level, and alluvial burial.

Early Holocene (11,600-7700 BP)

Early Holocene human populations are known from a few Bay Area sites, such as at Los Vaqueros reservoir (CA-CCO-696) and Santa Clara Valley (CA-SCL-178). Communities from this period were semi-mobile hunter-gatherers who in addition to tools, used some “site furniture” such as manos and milling slabs. Human burials from this period have also been investigated. There are no documented Early Holocene sites in San Francisco.

Middle Holocene (7700-3800 BP)

Middle Holocene sites are more widespread in the San Francisco Bay Area and are evidenced by substantial settlements, isolated burials, distinct cemeteries, milling slabs, mortars and pestles, and the fabrication and use of shell beads and other ornaments. Differences in burial treatment such as differential distribution of shell beads and ornaments are interpreted as evidence of possible social stratification. The expansion of San Francisco Bay’s estuaries and tidal wetlands seems to have resulted in a shift toward coastal and maritime resource exploitation. As mentioned above, San Francisco has one Middle Holocene

site (CA-SFR-28), consisting of the remains of a young woman found in marsh deposits 75 feet below the surface.

Late Holocene (3800–170 BP)

It is the Late Holocene that has left the strongest archaeological record of prehistoric populations in San Francisco. This period is marked by the establishment of the large shellmounds. Artifact assemblages are characterized by bone awls (indicating appearance of coiled basketry), net sinkers, mortars (probably indicating greater consumption of acorns), Olivella shell beads, the appearance of the bow and arrow that replaced the atlatl and dart technology, and diverse beads and ornaments, such as incised bird bone tubes. There is some indication of a greater exploitation of deer, sea otter, mussels, and clams. There is growing indication of shellmounds as planned, constructed landscapes on sites of ancestral, or at least, mortuary importance.

Within the past 30 years or so, the body of work on the prehistoric northern San Francisco peninsula has expanded, as archaeological sites are uncovered during construction or development activities within the City. Approximately 50 prehistoric archaeological sites have been documented within the northern San Francisco peninsula and Yerba Buena Island; the majority of these were within ½ mile or less from the historic margins of San Francisco Bay. The great majority of prehistoric sites are shell midden sites which have their greatest concentrations in the South of Market Area (13 sites) and the Hunters Point-Bayview-Candlestick Point-Visitacion Valley area (14 sites). A third area of apparent intense prehistoric occupation was on the terraces of Islais and Precita Creeks just above their broad tidal estuary. Prehistoric sites documented along the northern bayshore appear to be smaller occupation sites or food processing camps. Additional shell midden sites have been located in the Lake Merced area. One of the well-researched shellmounds in San Francisco is CA-SFR-4 on Yerba Buena Island which has been determined to have been first used exclusively as a cemetery site for around three hundred years, and later hosted a more intensive and diverse occupation.

On the assumption that prehistoric resources are one of the most vulnerable components of the City's heritage, the draft Preservation Element of the San Francisco's *General Plan* states that all indigenous archaeological sites shall be presumed to have prima facie significant archaeological research value, including re-deposited or disturbed prehistoric deposits. Disturbed or secondary prehistoric archaeological deposits, under this policy, would be presumed to have potential information value, in the absence of a convincing demonstration to the contrary.

ETHNOGRAPHIC OVERVIEW

The City of San Francisco is part of the coastal region occupied by the Ohlone or Costanoan group of Native Americans at the time of historic contact with Europeans. Although the term Costanoan is derived from the Spanish word *costaños*, or “coast people,” its application as a means of identifying this population is based in linguistics. Costanoan-speaking tribal groups occupied the area from the Pacific Coast to the Diablo Range and from San Francisco to Point Sur. Modern descendants of the Costanoan prefer to be known as Ohlone. The name Ohlone is derived from the Oljon group, which occupied the San Gregorio watershed in San Mateo County.

It is likely that the ancestors of the Ohlone arrived in the Bay region approximately 4000 years before present as evidenced by cultural patterns, and mortuary practices quite distinct from that of the indigenous Hokan-speaking populations whom arrived much earlier than formerly thought. Based on historical linguistics and archaeological evidence, these populations are thought to have introduced a language.

Although interrelated as a linguistic family, the eight Costanoan languages comprised a continuum in which neighboring groups could probably understand each other. However, beyond neighborhood boundaries, each group’s language was reportedly unrecognizable to the other. Each of the eight language groups was subdivided into smaller village complexes or tribal groups with independent political entities, and each occupying specific territories defined by physiographic features. Each group controlled access to the natural resources of their territories, which also included one or more permanent villages and numerous smaller campsites used as needed during a seasonal round of resource exploitation.

The Costanoan tribe that occupied the northern end of the San Francisco peninsula in the late 18th century is known under the general term Yelamu. The Yelamu were divided into three semi sedentary village groups with at least five settlements (Chutchi, Sitlintac, Amuctac, Tubsinte, and Petlenuc) located within present day San Francisco. Yelamu may have also been the name of an additional settlement within the vicinity of Mission Dolores.

Within less than two months after the arrival of the Spanish in 1775 who had begun construction of the first Mission Dolores, all of the Yelamu villages in San Francisco were attacked and burned by an expedition sent by the Ssalson tribe, the Costanoan tribe of the San Mateo area. The Yelamu survivors abandoned all of the San Francisco settlements seeking refuge with other groups in East Bay and Marin. Until they were missionized in the late 18th century, the Yelamu only returned to San Francisco for occasional hunting. The arrival of the Spanish in 1775 generally led to a rapid and major reduction in

native California populations. Diseases, declining birth rates, and the effects of the mission system served to disrupt aboriginal lifeways.

Archaeological study of indigenous peoples of San Francisco includes not only prehistory but the study of Native Americans after Mission Dolores was secularized, especially during the Yerba Buena Period (1835–1848) and the early Gold Rush Period (1848–1853). The place of Native Americans (almost assuredly all former neophytes) within local society at this time has received little investigation. However, the historical record reveals their presence in Yerba Buena and the area around Mission Dolores as construction laborers and livestock keepers.

In the 1990s, some Ohlone groups (e.g., the Muwekma, Amah, and Esselen further south) submitted petitions for federal recognition. Many Ohlone are active in preserving and reviving elements of their traditional culture and actively consult on archaeological investigations.

PALEONTOLOGICAL SETTING

The project site is located within the Coast Range Geomorphic Province, which is composed of a series of northwest-trending ranges separated by parallel river valleys. Topography in the project area is structurally controlled by the San Andreas fault system. The Coast Ranges were formed when fragments of Mesozoic and early Cenozoic rocks that were originally part of oceanic plates were accreted to the North American plate along a subduction zone.

Based on a review of the *Geologic Map of the San Francisco-San Jose Quadrangle* the project site is located within the Mesozoic-age Franciscan Assemblage.⁵ This geologic unit consists primarily of greywacke sandstone and shale, as well as chert (formed from siliceous skeletons of radiolarians), and minor amounts of limestone, greenstone, and serpentinite. Within the Central Belt of the Franciscan Assemblage, where the proposed project site is located, the Franciscan forms a discontinuous jumble of rocks (a melange), resting within a matrix of sheared mudstone. The oldest rocks within this unit date from the late Jurassic period.

⁵ Wagner, D. L., E. J. Bortugno, and R. D. McJunkin, 1991, *Geologic Map of the San Francisco-San Jose quadrangle. California Division of Mines and Geology, Regional Geologic Map Series, Map No. 5.*

HISTORIC SETTING

The following history of the Fairmont Hotel summarizes the information presented in the HRE and Archaeological Review Checklist.^{6,7} The Fairmont Hotel complex is located at the top of Mason Street between Sacramento and California Streets in the Nob Hill neighborhood in San Francisco. Nob Hill was originally the site of many major mansions at the turn of the 20th century. Houses at the top of Nob Hill were owned by the influential and wealthy of San Francisco, including the Crocker, Fair, Stanford, Hopkins, and Flood families. Nob Hill is now composed mostly of residential units and high-end hotels. The Mark Hopkins Hotel is located to the south of the Fairmont Hotel, across California Street. To the west, the Fairmont Hotel complex looks across Mason Street toward Grace Cathedral. The historic cable car lines cross at Powell and California Streets, where a signal booth at the southeast corner helps to control the traffic flow. The cable cars are an important aspect of the site of the Fairmont Hotel complex. Historically, the easy access provided by the cable car system was the reason that the hilltop was desirable to the elite. The neighborhood was given this nickname “Nob Hill” early in San Francisco history. The nickname refers to the “hob nobbers” but can also be interpreted as an uncomplimentary nickname for the “snobs” of the wealthy neighborhood. Though not a recognized historic or conservation district, the area is still noted for its role in the development of San Francisco.

By the late 1860’s, a large single family house occupied the southeast corner of the hotel block with a veranda wrapping around at least the northern and eastern sides of the house. Various sources identify this residence as the Nob Hill mansion of D. Porter from the mid-1870’s to early 1890’s. By the end of the 19th century, the building was identified as the “Casa del Mar” boarding house. A 25-foot high brick and tone retaining wall had been constructed along the western boundary of the residential property which followed a north-south axis through the center of the block.⁸

Originally slated to open in 1906, the Fairmont Hotel was severely damaged and the interior destroyed by the San Francisco earthquake and fire of 1906. The 1906 earthquake and fire devastated the area. The shell of the Fairmont Hotel and the Flood Mansion were all that remained of the area. Under the direction of Julia Morgan, the original Reid Brothers design was completed and the Fairmont Hotel opened almost

⁶ Knapp Architects, 2009, *Historic Resource Evaluation Report Fairmont Hotel 950 Mason Street*, August. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

⁷ San Francisco Planning Department, 2009, *MEA Preliminary Archaeological Review Checklist: 950 Mason Street: The Fairmont Hotel*, December 16. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

⁸ San Francisco Planning Department, 2009, p. 8.

exactly a year after originally planned. The hotel played an important part in San Francisco's history, marking the City's first steps in its return to prosperity after the 1906 earthquake and fire. It also served as an historic meeting place for the United Nations after World War II.⁹

HISTORIC 1906 FAIRMONT HOTEL

The historic 1906 Fairmont Hotel is the earliest portion of the Fairmont Hotel complex constructed in 1906-1907 and is described as having a classical tripartite composition. The historic 1906 Fairmont Hotel underwent various modifications prior to the addition of the 1960s podium and tower structure. The base of the historic building is constructed of granite from the ground to the second floor. Above the granite base, the body of the building is clad in white smooth terra cotta from floors three through six. The top of the building is defined by what were originally a terra cotta entablature, cornice, and parapet.

A penthouse is located above the seventh floor of the historic 1906 Fairmont Hotel and constitutes the eighth floor (see Figure III-2, p. III-10). It was added by D. M. Linnard in 1927. As the NRHP nomination form notes, the penthouse is only visible from the east, because it is set back from the western edge of the historic 1906 Fairmont Hotel building, behind the parapet. The seventh floor and penthouse additions have plaster exterior finishes.

The main entrance to the historic 1906 Fairmont Hotel is along Mason Street. From this entrance, the hotel opens up to the lobby level, which includes the front vestibule, the main lobby, Laurel Court, Gold Room, Venetian Room, French Room, and the Cirque Bar (see Figure III-9, p. III-17). The Arcade level (Level B1), below the Lobby level, contains hotel offices, two restaurant spaces, and the hotel's main kitchen. The Terrace level (Level B2), which is located below the Arcade level, includes the employee cafeteria, the boiler room, the laundry room, several offices, the Vanderbilt Room, the Terrace Room, the Tonga Room and the Club One health club. The Mezzanine (Level 2), the level above the lobby, contains offices, a beauty salon, and meeting rooms. Floors two through seven of the historic 1906 Fairmont Hotel contain 365 guest rooms. As noted above, the penthouse level constitutes the eighth floor.

The façade of the historic 1906 Fairmont Hotel has undergone some minor alterations though the building retains a high level of historic integrity. There are several alterations seen from the exterior that while not original to the 1906 Fairmont Hotel design, have gained significance in their own right.¹⁰ The 1929 D. M.

⁹ Knapp Architects, 2009, p.4.

¹⁰ San Francisco Planning Department, 2010, *Historic Resource Evaluation Response: 950 Mason Street: The Fairmont Hotel*, March 12. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E, p. 10.

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

Linnard penthouse structure and cast iron balconies are alterations that contribute to the historic 1906 Fairmont Hotel's significance; however, alterations that do not contribute to the significance include: the non-historic display windows, entries, signage, awnings, and exterior cladding associated with previous commercial tenant improvements along the California Street façade; and the louvers installed within historic window openings and alterations at the base for service entrances along the Sacramento Street façade. Additionally, the east elevation (facing Powell Street) was altered at the Venetian Room level to make room for a performance stage. The alterations associated with the performance stage have been found not to contribute to the historic 1906 Fairmont Hotel's significance.¹¹

Guest rooms and corridors on floors three through six of the historic 1906 Fairmont Hotel were renovated in 1999–2000. Historic features that remain include doors, door hardware, door frames, moldings, transoms, and cove ceilings. Several bathrooms on the seventh floor retain original fixtures and finishes.

The Cirque Room is in its original location at the southeast corner of the Lobby/Podium Level of the historic 1906 Fairmont Hotel (see Figure III-9, p. III-17). It is discussed here as a notable interior feature of the historic 1906 Fairmont Hotel. The Cirque Room was analyzed in the HRE and HRER as it was initially considered for removal but under the currently proposed project would only undergo minor alteration to modify an existing passageway located at the south of the bar to connect the Cirque Room to existing retail and proposed restaurant spaces to the west.

A portion of the Cirque Room was altered when the entry doors were removed and an exterior window opposite the entry was modified to provide a connection to the Pavilion Room and Halprin garden located on the roof of the 1960 podium structure. The Cirque Room no longer operates as a formal bar and lounge; however, it still retains the majority of its character-defining features including the historic bar, banquettes, murals, moldings, wood paneling, and mirrored columns. The room was restored in 1981 and several new murals were added at that time. Other than the alterations associated with the pass-through, the Cirque Room appears to retain a very good level of historic integrity.

Previous Listings

The historic 1906 Fairmont Hotel is listed as San Francisco Landmark number 185. This local designation includes the exterior of the 1906 Fairmont Hotel, but not the 1960s tower or podium structure.

¹¹ Ibid.

The historic 1906 Fairmont Hotel was nominated¹² and was listed on the National Register of Historic Places (NRHP) in 2002, as building #02000373. Because it was formally listed on the National Register, it is also listed in the California Register of Historical Resources (CRHR). The building is listed in the NRHP by virtue of its national and local significance. It was determined eligible under NRHP Criterion A at a national level, in the area of politics and government, because it was the location for the drafting of the United Nations Charter in 1945. It was also listed under Criterion C at a local level of significance as an excellent example of turn-of-the-century Beaux-Arts Classicism in San Francisco, and as a notable 1906–1907 work of the Reid Brothers Architects. The period of significance for the historic 1906 Fairmont Hotel is 1906–1945.

Similar to the 1987 Landmark evaluation, the NRHP nomination describes the property as featuring two parts: the historic main building and the modern hotel tower and podium wing constructed in 1960–1961. The NRHP nomination stipulated that the Fairmont Hotel tower and podium was considered to be a non-contributing building on the site of the Fairmont Hotel.

As noted above, because the historic 1906 Fairmont Hotel was listed in the NRHP, it is automatically listed in the CRHR and is thus classified as Category A (Known Historic Resource) for the purposes of CEQA and the San Francisco Planning Department’s procedures for identifying historic resources. The Fairmont Hotel podium and tower, which were constructed on the eastern half of the site in 1960, were not included in the 1987 Landmark designation.

REGULATORY SETTING

FEDERAL REGULATIONS AND LAWS

Federal regulations for cultural resources are primarily governed by Section 106 of the National Historic Preservation Act of 1966 (NHPA), which applies to actions taken by federal agencies, including projects that take place on federally controlled land or facilities, require federal agency permits, or receive federal funding. The criteria for determining NRHP eligibility are found in 36 Code of Federal Regulations (CFR) Part 60. Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties and affords the federal Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. Section 301(7) of the NHPA defines an

¹² Page & Turnbull, 2001, *National Register of Historic Places Nomination prepared by Carolyn Kiernat*. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

undertaking as any project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including:

- Those carried out by or on behalf of the agency;
- Those carried out with federal financial assistance;
- Those requiring a federal permit, license, or approval;
- Those subject to state or local regulation administered pursuant to a delegation of approval by a federal agency.

The NHPA also authorizes the Secretary of the Interior to maintain a NRHP and directs the Secretary to approve state historic preservation programs that provide for a State Historic Preservation Officer. The Council's implementing regulations are found in 36 CFR Part 800. The NRHP criteria (contained in 36 CFR 60.4) are used to evaluate resources when complying with NHPA Section 106. Those criteria state that eligible resources comprise districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and any of the following:

- A) Are associated with events that have made a significant contribution to the broad patterns of our history;
- B) Are associated with the lives of persons significant in our past;
- C) Embody the distinctive characteristics of a type, period, or method of construction, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; and
- D) Have yielded or may be likely to yield, information important to history or prehistory.

Archaeological site evaluation assesses the potential of each site to meet one or more of the criteria for NRHP eligibility based upon visual surface and subsurface evidence (if available) at each site location, information gathered during the literature and records searches, and the researcher's knowledge of and familiarity with the historic or prehistoric context associated with each site.

No federal nexus exists for the proposed project, and thus Section 106 is not applicable. However, the previous listing of the historic 1906 Fairmont Hotel in the NRHP and the proposed project's ability to meet the *Secretary of the Interior's Standards* is a consideration for the purposes of the impacts evaluation.

As noted above, the federal level of regulation includes the *Secretary of the Interiors Guidelines for the Treatment of Historic Properties* (Secretary's Standards).

In general, the Secretary's Standards are intended to promote responsible preservation practices to protect important cultural resources and may be applied to all properties identified as historic resources including buildings, sites, structures, objects, and districts. The Secretary's Standards include four treatment approaches: Preservation, Rehabilitation, Restoration, and Reconstruction. The first treatment, Preservation, emphasizes the retention of all original historic materials through conservation, maintenance and repair. Rehabilitation emphasizes the retention and repair of historic materials, but provides more latitude for replacement because it is assumed the property is more deteriorated. Restoration focuses on the retention of materials from the most significant time in a property's history, while permitting the removal of materials from other periods. Reconstruction establishes limited opportunities to re-create a non-surviving site, landscape, building, structure, or object in all new materials.

The Secretary's Standards identify four distinct, but interrelated, approaches to the treatment of historic properties – preservation, rehabilitation, restoration, and reconstruction:

- **Preservation** focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.
- **Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- **Restoration** depicts a property at a particular period of time in its history, while removing evidence of other periods.
- **Reconstruction** re-creates vanished or non-surviving portions of a property for interpretive purposes.

The Secretary's Standards were originally published in 1977 and revised in 1990 as part of Department of the Interior regulations (36 CFR Part 67, Historic Preservation Certifications). They pertain to historic buildings of all materials, construction types, sizes, and occupancy. The Standards encompass the exterior and the interior of historic buildings as well as related landscape features.

The Secretary's Standards are intended to apply to specific rehabilitation projects in a reasonable manner and take into consideration the proposed project's economic and technical feasibility. The Secretary's Standards consist of ten defining principles in building restoration and rehabilitation:

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent, or related new construction, shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

These defining principles form the basis for protection methods that would be undertaken for the proposed renovation and construction project as it pertains to the historic 1906 Fairmont Hotel, which is listed on the NRHP.

STATE PLANS, POLICIES, REGULATIONS, AND LAWS

CEQA offers directives regarding impacts on historical resources and unique archaeological resources. The *CEQA Guidelines* define a “historical resource” to include more than one category of resources. The

first category is “resource(s) listed or eligible for listing on the California Register of Historic Resources (CRHR).”¹³ Types of historical resources that are eligible are specified in the California Code of Regulations (CCR) Title 14, Division 3, Chapter 11.5. Types of resources eligible for nomination include buildings, sites, structures, objects, and historic districts.¹⁴

A historical resource may be eligible for inclusion in the CRHR, as determined by the State Historical Resources Commission or the lead agency, if the resource:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; or
2. Is associated with the lives of persons important in our past; or
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition, a resource is presumed to constitute a “historical resource” if it is included in a “local register of historical resources” unless “the preponderance of evidence demonstrates that it is not historically or culturally significant.”¹⁵

Another category of “historical resources” is those deemed significant pursuant to criteria set forth in PRC Section 5024.1(g), as follows:

[a] resource identified as significant in an historical survey may be listed in the California Register if the survey meets all of the following criteria:

- (1) The survey has been or will be included in the State Historic Resources Inventory.
- (2) The survey and the survey documentation were prepared in accordance with ... procedures and requirements [of the State Office of Historic Preservation].
- (3) The resource is evaluated and determined by the [State Office of Historic Preservation] to have a significance rating of Category 1 to 5 on [the Department of Parks and Recreation Historic Resources Inventory Form].
- (4) If the survey is five years or more old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historic resources which have become eligible or ineligible due to changed circumstances or further

¹³ CCR, Section 15064.5(a)(1). See also Public Resources Code (PRC) Sections 5024.1 and 21084.1.

¹⁴ CCR, Section 4852.

¹⁵ CCR, Section 15064.5(a)(2).

IV. Environmental Setting, Impacts, and Mitigation
D. Cultural and Paleontological Resources

documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

Resources identified by such surveys are presumed to be historically or culturally significant unless the preponderance of the evidence demonstrates otherwise.

The final category of “historical resources” is an optional one, which a lead agency may opt to consider or not consider. According to the *CEQA Guidelines* Section 15064.5(a)(3):

Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record.

CEQA Guidelines Section 15064.5(b)(3) states that “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 historical resource.”

CEQA requires that the effects of a project on an archaeological resource be taken into consideration and that the archeological resource be evaluated as either an “historical resource” (CCR Section 15064.5(a)) or a “unique archaeological resource” (CCR, Section 15064.5(a)(2)). If a project may affect an archaeological resource then the CEQA Guidelines require that it shall first be determined if the archaeological resource is an “historical resource”, that is, if the archaeological resource meets the criteria for listing in the CRHR. To be eligible for listing to the CRHR under Criteria 1, 2 or 3, an archaeological site must contain artifact assemblages, features, or stratigraphic relationships associated with important events, or important persons, or be exemplary of a type, period, or method of construction (CEQA Guidelines Section 15064.5(a)(1) and (3) and (c)(1) and (2)). To be eligible under Criterion 4, an archeological site need only show the potential to yield important information (United States Department of the Interior 1986). An archaeological resource that qualifies as a “historical resource” under CEQA, generally, qualifies for listing under Criterion “4” of the CRHR (CEQA Guidelines Section 15064.5(a)(3)(D)). An archaeological resource may qualify for listing under Criterion “4” when it can be demonstrated that the resource has the potential to significantly contribute to questions of scientific/historical importance. The research value of an archaeological resource can only be evaluated

within the context of the historical background of the site of the resource and within the context of prior archaeological research related to the property type represented by the archeological resource.¹⁶

If data recovery through excavation is the only feasible mitigation, a data recovery plan that makes provisions for adequately recovering the scientifically consequential information from and about the historical resource shall be prepared and adopted before any excavation is undertaken.¹⁷ Other acceptable methods of mitigation under the *CEQA Guidelines* Section 15126.4 include excavation and curation or study in place without excavation and curation (if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource).

The *CEQA Guidelines* Section 15064.5(e) requires that excavation activities be stopped whenever human remains are uncovered and that the county coroner be called to assess the remains. If the county coroner determines that the remains are those of Native Americans, the California State Native American Heritage Commission (NAHC) must be contacted within 24 hours. At that time, the *CEQA Guidelines* Section 15064.5(d) direct the lead agency to consult with any appropriate Native Americans as identified by the NAHC in a timely manner, and direct the lead agency (or applicant), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains.

LOCAL PLANS, POLICIES, REGULATIONS, AND LAWS

City and County of San Francisco Planning Department CEQA Review Procedures for Historic Resources

San Francisco Preservation Bulletin No. 16 provides guidance for historic evaluation under CEQA. As a certified local government and the lead agency in CEQA determinations, the City and County of San Francisco has instituted guidelines, and a system for initiating CEQA review of historic resources. The San Francisco Planning Department's "CEQA Review Procedures for Historical Resources" incorporates the State's *CEQA Guidelines* into the City's existing regulatory framework. To facilitate the review process, the Planning Department has established categories to determine the baseline significance of historic properties based on their inclusion within cultural resource surveys and/or historic districts. These categories include Category A.1 (Resources listed on or formally determined to be eligible for the CRHR), Category A.2 (Adopted local registers and properties that have been determined to appear, or may become, eligible for the CRHR), Category B (Properties requiring further consultation and review),

¹⁶ California Office of Historic Preservation, 1991, *Preservation Planning Bulletin Number 5*.

¹⁷ CCR, Section 15126.4(b)(3)(C).

IV. Environmental Setting, Impacts, and Mitigation
D. Cultural and Paleontological Resources

Category C (Properties determined not to be historical resources or properties for which the City has no information indicating that the property is an Historical Resource).

The historic 1906 Fairmont Hotel is considered a Category A.1 resource as it is formally listed in the CRHR by virtue of its listing on the NRHP. For this reason, it is a historical resource for the purposes of CEQA. Additional components of the Fairmont Hotel complex were Category B resources (Properties requiring further consultation and review), and are discussed in more detail below.

Article 10 of the Planning Code¹⁸

Per Article 10 of the San Francisco Planning Code, a Certificate of Appropriateness (C of A) is required from the Historic Preservation Commission for alterations to designated City Landmarks and Historic Districts, including:

1. Any construction, alteration, removal or demolition of a structure or any work involving a sign, awning, marquee, canopy, mural, or other appendage, for which a City permit is required, on a Landmark site or in an Historic District;
2. Exterior changes in an Historic District visible from a public street or other public place, where the designating ordinance requires approval of such changes pursuant to the provisions of Article 10; and,
3. The addition of a mural to any Landmark or contributory structure in an Historic District, which is not owned by the City or located on property owned by the City, regardless of whether or not a City permit is required for the mural.

The proposed project would include exterior alterations to the historic 1906 Fairmont Hotel, a listed San Francisco Landmark; therefore, a C of A would be required.¹⁹

San Francisco General Plan

The Urban Design Element of the San Francisco *General Plan* designates numerous policies that seek to guide projects in conjunction with historic preservation goals. Below are the four policies that are most applicable to the proposed project. The proposed project would generally be consistent with the following policies: Urban Design Element Policy 2.4 to preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide

¹⁸ Articles 10 and 11 of the San Francisco Planning Code are in the process of being revised to account for changes that have resulted from the approval of the Historic Preservation Commission (HPC). Proposition J was passed in 2008 which replaced the Landmarks Preservation Advisory Board by creating the new HPC.

¹⁹ Page & Turnbull, 2009, *Certificate of Appropriateness to the San Francisco Planning Department, Fairmont Hotel Revitalization*, Revised November, Case No. 2008.0081A.

continuity with past development; Policy 2.5 to use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings; Policy 2.6 to respect the character of older development nearby in the design of new buildings; and Policy 2.7 to recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character.

The proposed project would be generally consistent with these urban design policies and would preserve the historic 1906 Fairmont Hotel and would include additional renovation. The proposed project design is intended to be visually compatible with existing residential uses and includes building elements to help integrate the proposed new tower, which replaces an existing tower, into the existing fabric of the Nob Hill neighborhood. The proposed new building design would include a prominent atrium entrance at the corner of California and Powell Streets, which would provide another pedestrian access to the site. In addition, the existing blank brick facade on California and Powell Streets would be replaced by a more varied and intricate structure of the proposed podium and mid-rise residential component, providing more visual interest along the street level. New landscaping on the podium courtyard level and sidewalk improvements such as street trees would be included in compliance with the City's urban design guidelines. The compatibility of the proposed residential tower and podium structure with the historic 1906 Fairmont Hotel and the potential Residential Apartment historic district is analyzed in this section.

CATEGORY B RESOURCES: FURTHER REVIEW REQUIRED

The HRE prepared by Knapp Architects identified one Category A (Known Historic Resource) located within the proposed project site: the historic 1906 Fairmont Hotel which was described previously. The HRE focused on several specific architectural features of the property which were age-eligible but were not evaluated or were previously considered non-contributing to the historic Fairmont Hotel as they were less than 50 years old at the time the NRHP nomination was completed in 2001. The features include the podium structure, the tower structure, the Halprin Rooftop Garden, the Cirque Room, and the Tonga Room.

Podium, Hotel Tower, and Lawrence Halprin Garden

The Fairmont podium and tower structures and rooftop garden were constructed in 1960. The podium extends from the east wall of the historic 1906 Fairmont Hotel to the boundaries of the site along Sacramento, Powell, and California Streets. Above the podium structure at the northeast corner of the site is the 23-stories tall hotel tower (see Figure III-2, p. III-10). The hotel tower is accessible from either the

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

rooftop garden from the Pavilion Room to the south, or internally from the historic 1906 Fairmont Hotel through a corridor paralleling Sacramento Street.

The hotel tower is the tallest component of the Fairmont Hotel complex. Engaged pilasters faced in granite divide the tower elevations into bays. Along the street elevations, gray brick infill exists between the pilasters at the base of the tower; above a rusticated marble block facing. There are six bays on both the north (Sacramento Street) and south elevations. The tower is narrower along Powell Street, with two large and two secondary bays. The exterior elevator is centered on the Powell Street façade. The hotel tower's west elevation has small windows along the elevator and service spaces, and is faced with light brown brick.

As noted in the San Francisco Planning Department's HRER, the hotel tower and podium, "does not contribute to the associations that convey the significance of the 1906 Fairmont Hotel."²⁰ The existing podium and hotel tower were designed in 1960 by Mario Gaidano, a prolific Bay Area architect who designed over 700 buildings during his career. The podium and hotel tower's form, materials and detail do not represent important developments in design or construction, and the structures are not known to be associated with historically important events, persons or architecture. Also, "given the amount of work accomplished by the firm, the architect's recent passing in 2003, and the lack of scholarly research associated with his firm's work, it does not appear that sufficient time has passed to guide an objective and thorough analysis of the work of Mario Gaidano, including the existing podium and hotel tower at this time."²¹ Thus for the purposes of CEQA, the podium and hotel tower were determined not eligible for listing to the CRHR and do not currently rise to a level that would justify inclusion as character-defining features of the historic 1906 Fairmont Hotel.²²

The roof of the podium features a 72 foot by 120 foot (8,640 square foot) rooftop garden designed by landscape architect Lawrence Halprin. While most of the garden is not visible from the street level, a portion of the taller trees and higher landscaping are visible. The garden features three canary palms, grass and flower plantings as well as a central fountain. Small trees and benches line the eastern side of the garden. Overall, the rooftop garden features few distinct features and is modest and limited in design. The garden is featured in Halprin's book, *Cities*. According to the book, the garden was designed

²⁰ San Francisco Planning Department, 2010, *Historic Resource Evaluation Response: 950 Mason Street: The Fairmont Hotel*, March 12. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E, p. 3.

²¹ *Ibid*, p. 3.

²² *Ibid*, pp. 2-3.

specifically as a contemporary reference to the historic hotel and inspired by formal Victorian-era garden design.²³ Halprin is best known for public spaces such as Ghirardelli Square, Levi's Plaza, Justin Herman Plaza, and the Franklin Delano Roosevelt Memorial in Washington D. C. The roof garden at the Fairmont podium structure is limited in scale, compared to many of Halprin's well-known public space projects, which tended to not only be multi-leveled, but also more interactive.

Halprin designed spaces in which the public or visitors could interact with the landscape. The podium rooftop garden is not considered to be the most representative of his work compared to two other rooftop gardens from his portfolio: the Simon Roof Garden (1951) and the rooftop gardens at the Northpoint Apartments (1967), both in San Francisco. Also notable are his design applications such as the inclusion of rooftop gardens in the general neighborhood plans in New York City.

While the garden is notable for being designed by Lawrence Halprin, it is not a significant garden within the overall body of his work, and is not a unique or innovative example of his landscape design principles. Therefore, the garden is not significant under the California Register Criteria and is not eligible for the California Register based on his overall body of work. In contrast, the 1951 Simon Roof Garden in San Francisco exhibited Halprin's modernistic approach to landscape design and was the first of his landscape projects to receive international recognition. The roof gardens found on the 1967 Northpoint Apartments also exhibited design features more closely associated with Halprin's significant contribution to modern landscape design. For these reasons the podium rooftop garden at the Fairmont Hotel complex does not rise to a level that would identify it as eligible as a historic resource individually, as a landscape, or as a character-defining contributing feature of the historic 1906 Fairmont Hotel.²⁴

The podium, hotel tower, and Lawrence Halprin's rooftop garden were evaluated by Knapp Architects, with the concurrence of the San Francisco Planning Department and were found not to be historical resources for the purposes of CEQA, and will not be discussed further.

Cirque Room

The HRE prepared by Knapp Architects evaluated the Cirque Room as the previous design plans called for the remodel of this room. However, under the current project design the Cirque Room would be retained. The proposed project would modify an existing doorway at the south end of the bar which leads to a dishwashing room to connect the Cirque Room to the existing retail and proposed restaurant spaces to the west.

²³ Halprin, Lawrence, 1963, revised ed. 1972, *Cities*, pp. 186–187.

²⁴ San Francisco Planning Department, 2010, p. 3.

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

The Cirque Room was designed in 1935 by noted San Francisco architect Timothy Pflueger. His Art-Deco design could be seen in lounges contemporary with the Cirque Room, including the Top of the Mark, the Patent Leather Bar in the St. Francis Hotel, and the Bal Tabarin, which is currently operating as Bimbo's 365 Club. Pflueger is most renowned for his elaborately styled movie palaces, which include the Paramount Theater in Oakland, and the Castro Theater and El Rey Theatre in San Francisco. Pflueger also designed the 24 story Art Deco-styled Pacific Telephone and Telegraph Building in downtown San Francisco, as well as the Federal Building for the 1939 World's Fair.

The Cirque Room and the Bal Tabarin (Bimbo's 365 Club) are the two remaining bars in San Francisco which retain much of Pflueger's original design. The Cirque Room was one of the first public cocktail lounges to open after the end of Prohibition, and Pflueger's first public lounge.

Though other Pflueger lounges are still in use, and the Bal Tabarin (Bimbo's 365 Club) is still in operation as a night club, the Cirque Room is the only bar designed by Pflueger that remains mostly in its original state. As a result of a modification made to connect the historic 1906 Fairmont Hotel with the 1960s podium and tower, the space is divided by a hallway that leads to the Pavilion Room, separated from the bar area by a low marble wall with partitioned glass panels along the top. The flooring in the hallway is marble. The glass partition wall does not reach all the way to the ceiling. The north side of the hallway was once the north wall of the bar features the Bruton murals (discussed below). While there are still extant examples of Pflueger's interior spaces, this may be the most publicly accessible.

The Bruton Sisters were noted Northern California artists. Margaret Bruton (1894–1983), Esther Bruton Gilman (1896–1992), and Helen Bruton (1898–1985) were raised in San Francisco and studied art in California, New York, Europe (mostly Paris), and New Mexico. The restored murals of the Cirque Room are the only remaining Bruton murals visible in the hotel and extend from just below the crown molding to the top of the wainscot, about three and a half feet from the floor. The murals are all circus-themed and depict various animals, acrobats, and people. Unlike the other murals, the ones on the north wall lack the gray bunting which depicts a circus tent along the top of each panel.

The character-defining features of the Cirque Room include the restored Bruton sisters' murals and Pflueger's original design elements: the bar (including the water trough, solid mahogany bar itself, and mirrored bar back), mirrored columns, ceiling, and original lighting (the four down lights with starburst-fresnel patterned glass at the corners of the unmodified freestanding column, the five-faceted, beacon-like fixture above the bar back, and the square, recessed lights regularly spaced in the ceiling coffers). The

banquettes also appears to be character defining features while the carpet and wood window shutters are not character defining features of the Cirque Room.

As noted in the HRE, the association with Pflueger and the Bruton sisters is central to the significance of the Cirque Room and it retains sufficient integrity of location, workmanship, materials, feeling, and design to convey this significance.²⁵ The room represents a key example of Pflueger's interior design portfolio and conveys a strong association with the historic Fairmont Hotel during the subject building's period of significance, 1906–1945. Most important, however, is that the Cirque Room is the only bar designed by Timothy Pflueger that retains the majority of its original form. For the California Register, the Cirque Room and its own associated character-defining features are significant under Criterion 3 and are considered an interior character-defining feature of the historic Fairmont Hotel for the purposes of CEQA 15064.5(a)(3).²⁶

Tonga Room

The Tonga Room occupies the site of the “Plunge,” which was an indoor swimming pool constructed in 1929 at the rear of the Fairmont Hotel.²⁷ The Tonga Room is located on basement level 2 (Terrace Level) of the Fairmont Hotel complex, just east of the Terrace Room. The Tonga Room is accessible from the main lobby, via two curving stairs that lead down from Laurel Court. It is also accessible at grade by an entrance along California Street marked by a backlit sign that reads: “Tonga” in red 1960s-era script. Upon entering the Terrace Level from California Street, visitors are initially greeted by a decorative lava rock niche near the elevators that contains a carved Tiki flanked by Tiki torches.

The Tonga Room proper is composed of the following major spaces: Entry Alcove, Vestibule, Hurricane Bar, Dance Floor, Boat Decks A and B, Lagoon, Canoe House, Island Huts 1 and 2, and the Wharf. The following discussion provides an overview of each of these spaces in detail:

Entry Alcove

From the California Street entrance into the Fairmont Hotel, the first section of the Tonga Room encountered by the visitor is the entry alcove. The entry alcove was remodeled in 1967 along with the rest of the Tonga Room. A maitre d' station is located to the left of the main door along with benches for patrons. More important, the twilight-lit entry alcove sets the tone for guests before they enter the dark, torch-lit Tonga Room just beyond a pair of bi-fold glazed wood doors. The entry alcove features a sloped

²⁵ Knapp Architects, 2009, op. cit., p. 9.

²⁶ San Francisco Planning Department, 2010, p. 2.

²⁷ A portion of the plunge swimming pool remains and is now the Tonga Room “lagoon”.

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

carpeted floor and the walls are clad in black lava rock, bamboo, and Samoan Lauhala mat panels supplied by Oceanic Arts. The heavy beamed ceiling contains a recessed alcove, paneled in Lauhala mats, and a suspended bamboo chandelier. Located between the corridor and the entry alcove is a gilded statue of a Hindu god, possibly Vishnu. Above it is a heavy false beam ceiling with protruding outriggers painted blue. Covered in woven bamboo and red fabric, a sign mounted on the beam reads: “Tonga”. This element appears to date from the 2007–2008 remodel. To the left of this is a cloak room installed in 1945.

Vestibule

The Entry Alcove provides access to the southwest corner of the Tonga Room, where the vestibule connects with the Hurricane Bar to the east (right) and the “Canoe House” to the north, via Boat Deck A, which contains artifacts salvaged from the *S.S. Forester*. Flickering Tiki torches, sconces, and a massive carved Tiki stands opposite the entrance, greeting visitors to the Tonga Room, as do the recorded bird and monkey calls and soft Hawaiian music broadcasted from hidden speakers.

Hurricane Bar

East of the Vestibule is the Hurricane Bar. The Hurricane Bar occupies approximately the southern fifth of the Tonga Room and is composed of four sections: the bar, which is housed within a rectangular niche at the rear of the space, and three seating areas to the north, east, and west. The Hurricane Bar was updated in 2007–08, although most of the 1967 features (finishes were updated in 2007–2008) remain intact. The walls are clad with black lava rock and the bar itself is partially enclosed within a bamboo-framed structure with a Lauhala mat and bamboo ceiling. The bar features staggered shelving displaying the rums and mixers used to create the rum-based Polynesian drinks that the Tonga Room is known for. Behind the bar is a large wood-carved Hawaiian Tiki standing in front of a backlit red translucent panel installed in 2007–2008. An unused lava rock waterfall is located behind the panel. The bar has a contemporary granite bar top in place of the original wood counterpart. There is a red naugahyde-upholstered banquette seating area to the west and to the north is a seating area filled with Chinese-influenced tables and recently reupholstered chairs in red fabric. Located to the east of the bar is a rectangular seating area bounded by red banquettes. The walls of this seating area are clad in fabric and illuminated by compatible suspended incandescent light fixtures.

Dance Floor

A turned wood balustrade separates the Hurricane Bar from the wood maple flooring dance floor. The dance floor is rectangular and bounded on all four sides by turned ship railings possibly salvaged from the *S.S. Forester*. The dance floor also doubles as the staging area for happy hour hors d’oeuvres. The dance floor was remodeled in 2007–2008 and the flooring matches the materials installed in 1967.

Boat Decks A & B

Flanking the dance floor to the east and west are two raised seating areas called Boat Deck A & Boat Deck B, respectively. Boat Deck A features a portion of the mizzen mast, rat lines and rigging, and the ship's wheel. Boat Deck B features a portion of the foremast (originally 80 feet tall) salvaged from the *S.S. Forester*, and wood paneling suggesting the interior of a forecabin. Both decks are elevated above the main floor, accessed by stairs, and bounded by turned ship railings and wharf pilings. Both feature wood floors, brass signal lanterns, and other nautical artifacts, some authentic and others probably reproductions supplied by Oceanic Arts.

Lagoon

The lagoon, a portion of the former "Plunge", is located north of the dance floor and Boat Decks A and B. It descends in depth from north to south and is bounded by a raised bamboo railing. The floor and walls of the lagoon are finished in white ceramic tiles dating to the 1929 Plunge. Artificial rocks historically bounded the pool at the corners and along the sides. Moored at the rear of the lagoon is the band boat, originally called the *S.S. Tonga*. The band boat is made of wood and fiberglass and has a thatched-roof canopy supported by bamboo poles. When the house band performs, the band boat is hauled out to the middle of the lagoon by an underwater cable. When not in use it is "docked" at the wharf at the rear of the lagoon. The ceiling above the lagoon is finished in black-painted acoustical tiles and features a suspended metal water line used to produce the tropical showers that cascade into the lagoon on the half-hour.

Canoe House and Island Huts 1 and 2

Two large dining rooms that comprise the restaurant flank the lagoon north of the dance floor and boat decks A and B. West of the lagoon and north of boat deck A is the "Canoe House," an elaborately ornamented open-air house with a thatched flared roof, carved posts and lintels, and a carved outrigger canoe suspended from the ceiling. The exterior walls feature four large niches containing Lauhala mat panels, carved Tikis, and other Polynesian-themed decor. East of the lagoon and north of boat deck B is another restaurant dining room divided into two sections: Island Hut 1 and Island Hut 2. Both are bamboo-framed structures with Lauhala mat wall coverings and thatched roofs. Potted plants and a large Tiki divide the two dining areas. In addition there are four bamboo-wrapped columns with palapa-style roof coverings located next to the lagoon.

Wharf

At the rear of the lagoon is the wharf, where the band boat docks. Used as an overflow area from the restaurant, the wharf contains a server station and a staging area for the house band. In comparison with the rest of the Tonga Room with its "High Tiki" ornamentation, the Wharf is slightly more utilitarian.

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

Designed to resemble the dock area of a port city, the wharf is a nod to the older nautical theme of the original S.S. Tonga Room. The north (rear) wall of the wharf is clad in weathered gray horizontal shiplap siding and contains two faux windows concealed behind closed shutters. A similarly detailed door is located to the right (east) of the windows. Nautical-themed elements, including oars and ships lanterns, are mounted to the wall. Toward the right side of the wall is a wood sign that reads: “Fairmont Ship Chandlerer.” At the far right corner of the wharf is an open pass-through leading to the server station. The corners of the wharf area are clad in Philippine Lauhala mats and tapa cloth supplied by Oceanic Arts. The wharf is illuminated by suspended hurricane lamps.

Significance

The portion of the building that surrounds the Tonga Room was not specifically evaluated in the 2001 NRHP nomination. Thus, the HRE prepared by Knapp Architects assessed the potential for the Tonga Room to meet significance criteria in its own right. The report found that there were a lack of significant associations of the Tonga Room with historic events and people, but found that it did meet significance criteria for its architectural merits. However, the HRE did not address the threshold issue of whether the Tonga Room is the type of resource that is eligible for the CRHR.

The information used by the San Francisco Planning Department to evaluate the Tonga Room was provided in the HRE by Knapp Architects dated August 2009, and additional information was provided by Christopher VerPlanck dated September 13, 2009.²⁸ The Tonga Room as it generally appears today was designed by Howard Hirsch Interior Design in 1967, which identifies its design as less than 50 years of age. According to the California Register, potential resources less than 50 years of age are eligible for the Register if sufficient time has passed to understand their historical importance. As outlined in the HRE prepared by Knapp Architects and the additional information provided by Christopher VerPlanck, the San Francisco Planning Department believes that there is a sufficient amount of published work and research associated with popular culture in the American postwar period and that sufficient time has passed to objectively evaluate the potential significance of the Tonga Room.²⁹

Historically, the Tonga Room has retained a separate identity and a strong association all of its own. Its association with the broad influence of Polynesian Pop culture in the United States is a stronger tie than its association with the Fairmont Hotel. The San Francisco Planning Department has determined that this

²⁸ VerPlanck, Christopher, 2009, *950 Mason Street – The Tonga Room, California Department of Parks & Recreation BSO Form*, September 13. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E, p. 11.

²⁹ San Francisco Planning Department, 2010, p. 7.

association and the unique characteristics of the Tonga Room as it is designed necessitated an evaluation as a potentially individually eligible resource as a collection of objects rather than as a character-defining feature of the larger, and more easily recognized resource, the historic Fairmont Hotel.

The California Register defines an “object” as, “...those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed, as opposed to a building or structure. Although it may be moveable by nature of design, an object is associated with a specific setting or environment.” The California Register also states that an object should be located in an appropriate setting in order to convey its significance. The Planning Department’s HRER concludes that the Tonga Room is an individually eligible resource under the California Register architecture C/3 Criterion as a “collection of objects” that dictate their own significance as related to a specific context described below.³⁰

The Tonga Room represents a rare remaining example of a distinct phase in post-World War II popular culture, and includes a substantial number of its distinctive characteristics. Its use of both real (remnants of S.S. Forester) and faux South Pacific and nautical elements, the swimming pool now converted lagoon, the association with designers noted for their connection with important developments in popular culture, and the variety of features used to create the illusion (such as the simulated thunderstorms) make the Tonga Room a strong example of Tiki design. These features recall the architectural design of other Tiki-themed restaurants.

Escape was part of the original premise of Tiki bar designs; however, a unique feature of the Tonga Room that separates it from the majority of other Tiki bars of the period is that the designers were successful in creating a venue where patrons are encouraged to participate in the Tonga Room experience through the design and placement of the elaborate features. The Tonga Room plays heavily on all sensory perceptions and the patron’s interaction and immersion within the created environment is critical to understanding its significance. The Tonga Room represents a collection of objects that were designed, constructed or manufactured, and located within a specific setting in order to create a stylistic expression and all-encompassing experience. Some elements of the interior that are defined as objects and that contribute to this experience include the half-hourly tropical storm system and its function. Boat Decks A and B, the Canoe House, the Band Boat, the Island Huts 1 and 2 as well as other character-defining features such as

³⁰ Ibid, pp. 6-7.

IV. Environmental Setting, Impacts, and Mitigation
D. Cultural and Paleontological Resources

electric tiki torches and sconces, lava rocks, wood paneling, rattan, and various Polynesian artifacts and statuary.³¹

The Tonga Room is one of the last major, formally-designed Tiki-themed bars in California that remains in its original location; with the great majority of its original interior design and décor intact. Specifically, the San Francisco Bay Area previously featured a greater breadth of Tiki culture. Trad'r Sam's on Geary Boulevard is the only other establishment in the area from the initial era of Tiki design which is still in operation.

The Tonga Room exhibits exceptional importance due to its rarity and as one of the best examples of a “high-style” Tiki bar/restaurant in San Francisco and California. More than a series of decorative Polynesian elements, the Tonga Room creates an outdoor environment within an interior space providing the visitor with a transformative experience to another place and time.³² The Tonga Room, as it is conveyed as a collection of objects depicted in the design by Howard Hirsch Interior Design and manufactured and supplied by Oceanic Arts, appears to be individually eligible under the California Register under the architecture C/3 Criterion. While Hirsch passed away in 1997, the firm exists today and is still known as a highly regarded design firm that specializes in hotel interiors. Oceanic Arts, founded by Bob van Oosting and Leroy Schmaltz, still operates as a supplier of Polynesian-themed products and was responsible for the majority of materials and architectural elements of the Tonga Room. The Tonga Room embodies the distinctive characteristics of a “high-style” Tiki Bar from the post World War II period. The period of significance for the Tonga Room is 1967: the year the Howard Hirsch Interior Design was completed.^{33,34} Given this, the Tonga Room is a historical resource for the purposes of CEQA 15064.5(a)(3).

The Tonga Room is composed of the following major character-defining objects and features. It is important to note that the setting of the objects and features is a crucial component that is required for the resource to convey its significance. The characteristics of the following spaces – Entry alcove, Vestibule,

³¹ Ibid, pp. 6-7.

³² Ibid, p. 8.

³³ Ibid, p 7.

³⁴ VerPlank, 2009, p. 11.

Hurricane Bar, Dance Floor, Boat Decks A and B, Lagoon,³⁵ Canoe House, Island Huts 1 and 2, and the Wharf. The Tonga Room contains the following character-defining objects and features:

- The existing wall applications: including lava rock, wood panel, Lauhala mats, rattan, bamboo and any other materials that date from the 1967 remodel.
- The “architectural” objects: the Canoe House. Island Huts 1-2, the four palapas near the Island Huts, the Hurricane Bar, the Wharf area, Boat Decks A and B, the Lagoon (Plunge Swimming Pool) and the Band Boat. The significant features of the Lagoon are the coping, associated lava rocks, and pool tiles.
- Other character-defining objects and features: the half-hourly tropical storm located above the lagoon, statuary, including the multiple carved Polynesian artifacts such as the numerous Tikis located throughout the space, the canoe located in the Canoe House, the carved balustrades and other elements of the *S.S. Forester*; light fixtures such as the electric tiki torches and sconces; the Vishnu statue near the entrance, and signage near the entrance.
- Features or objects that are not character-defining features include carpeting, some wood flooring, upholstery, ephemeral wall hangings, and furniture.

The Tonga Room retains a high level of historical integrity. The objects associated with its significance, including the overall spatial characteristics of its setting, date from the 1967 remodel. There have been some upgrades to the Tonga Room since 1967: it appears that carpeting, furniture upholstery, the dance floor surface, the bar top on the Hurricane Bar, several wall hangings and light fixtures were replaced or upgraded in a 2007–2008 remodel. These non-contributing alterations present only a limited impact on the ability of the original elements’ location, setting, design, workmanship, materials, association, and feeling to convey their significance. Thus, the Tonga Room is an historical resource for the purposes of CEQA Section 15064.5(a)(3).

Potential Historic District

The area around the Fairmont Hotel is not a designated historic district. However, site visits performed by Planning Department Preservation Staff and additional reconnaissance-level survey work by Garavaglia Architecture of an eight-block area surrounding the block occupied by the Fairmont Hotel complex (nine

³⁵ It is important to note that the Plunge as it relates to the Fairmont Hotel in its historic use as the hotel swimming pool no longer retains enough historic integrity from its 1929–1945 appearance to be considered a character-defining feature of the historic Fairmont Hotel. The Plunge was constructed in 1929 during the Fairmont Hotel’s period of significance as determined and described in the 2001 NRHP nomination. The Plunge closed on August 18, 1945. Only a portion of the pool structure is now used as the lagoon water feature for the Tonga Room and all other associated elements of the Plunge have been removed. Thus, the current condition of the pool is associated more with the Tonga Room as a “lagoon” water feature than with the former Plunge of the Fairmont Hotel.

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

blocks total), confirms that there are a number of known and potential historic resources located in the area immediately surrounding the project site.³⁶ There are several buildings that warrant consideration as individual resources for their relationship to the Chinese community, such as 242 Joice Street, 827–829 Stockton Street, and 843 Stockton Street, all approximately 0.3 miles northeast of the project site. Along with a number of individually-eligible resources, Garavaglia Architecture identified a potential Social Club Thematic district, a potential Luxury Hotel Thematic district, and a potential Residential Apartment district.³⁷ The identified potential thematic districts would include a number of sites outside of the project study area and would be delineated though discontinuous geographic boundaries. (See Impact I-CP-1c, p. IV.D-39, for discussion regarding the proposed project not having an impact upon the potential discontinuous thematic historic districts, even if it could have an impact upon the potential Residential Apartment district.).

There are two types of residential buildings commonly found within the area: residential hotels and flats or small apartment buildings. Based on the survey work conducted by Garavaglia Architecture, it appears that there is a potential district comprised of residential hotel-type apartments constructed between 1906 and 1929. The potential Residential Apartment district appears to be delineated as an ensemble of buildings with a contiguous boundary: however, based on further research, it may be found that the district may be an expansion of the existing Lower Nob Hill Apartment Hotel National Register District.

The character-defining features associated with the potential historic district of residential apartment hotels include the following:

- The majority of potential contributing buildings are relatively large (20 or more units) masonry buildings within the 4- to 10-story height range.
- Strong stylistic expression in a variety of academic and composite revival styles ranging from Gothic, Renaissance, and Baroque to Art Deco and Art Moderne. Ornamentation is engaged and incorporated into the overall design rather than applied.
- Designed with a tripartite façade arrangement consisting of a base, shaft, and capital; exhibiting elaborate rooflines, cornices, dormers, or parapets; bases feature prominent and highly decorated centralized entries.

³⁶ Garavaglia Architecture, Inc., 2009, *Fairmont Hotel, Nine Block Study Area Reconnaissance Survey Report*. Prepared for CMA Inc. December 11. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

³⁷ *Ibid*, p. 14.

- Within the shaft, a strong sense of verticality and rhythm, through uniform or ganged fenestration patterns and solid to void ratios, bays and architectural details and ornament.
- Most corner buildings have elaborate cornices and are more Classical in design while mid-block buildings exhibit undulating facades to break up their massing and emphasize verticality. These changes in plane are commonly expressed through deep recesses and projections.

As for the smaller flats/apartments, there is a significant representation of this building type with high integrity of design: however it is unclear if this is unique to the area or echoes a general type of development found throughout the City of San Francisco.³⁸ The initial assessment of the December 2009 Garavaglia Architecture survey report is that the surrounding area related to this smaller flats/apartments building type does not represent a historic district, because of the commonality of this type of architecture within the City of San Francisco. The Planning Department concurs with these findings.³⁹

The results of this aforementioned survey are not conclusive and are based solely on an evaluation of the architectural (Criterion 3) merits of the survey area and additional known information at the time of the survey. While additional information may exist that would warrant the identification of a potential California Register eligible district of small flats and apartments in the future, it was not visibly evident through the evaluation by Garavaglia Architecture or site visits conducted by Preservation Planning Staff. Nevertheless, the results of this evaluation still conclude that the area surrounding the Fairmont Hotel site contains a number of California Register-eligible buildings and possesses a visually consistent and cohesive ensemble of residential buildings constructed during the early part of the 20th-Century.⁴⁰

IMPACTS

SIGNIFICANCE THRESHOLDS

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the State *CEQA Guidelines*, which has been adopted and modified by the San Francisco Planning Department. For the purpose of this analysis, the following applicable thresholds were used to determine whether implementing the proposed project would result in a significant impact to cultural resources. The proposed project would result in significant adverse cultural resource impacts if it would:

³⁸ San Francisco Planning Department, 2010, p. 9.

³⁹ Ibid. p. 9.

⁴⁰ Ibid, p. 9.

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

- D.a Cause a substantial adverse change in the significant of a historical resource as defined in *CEQA Guidelines* Section 15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code;
- D.b Cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* Section 15064.5;
- D.c Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or,
- D.d Disturb any human remains, including those interred outside of formal cemeteries.

The following impact analysis for cultural resources is based on two sources of information including the findings and recommendations of the HRE prepared for the project⁴¹ and the HRE prepared by the San Francisco Planning Department.⁴²

For the purposes of this impacts analysis, only certain features of the property are addressed as they are anticipated to be modified under the proposed project. Components of the historic 1906 Fairmont Hotel that would be modified under the proposed project include: possible reconfiguration of guest rooms in floors three through seven, historic California Street Wall, Venetian Room, and Cirque Room. In addition, the Tonga Room and a potential Apartment Residential historic district would be impacted.

The following impact analysis and mitigation measures are pursuant to the requirements of state and local laws and regulations which apply to cultural and paleontological resources. Where appropriate, improvement measures are also identified to further reduce less-than-significant impacts to less-than-significant levels.

PROPOSED PROJECT

The proposed project would include the demolition of the existing tower and podium structure in preparation for new construction on its site. The proposed project would include two main components: the renovation of portions of the historic 1906 Fairmont Hotel building and the construction of a new residential tower and podium structure on the site of the existing tower and podium. The proposed project would include construction of a new 317-foot-tall structure consisting of a 26-story tower and a five-story, 55-foot-tall mid-rise residential component, both above a five-story, 50-foot-tall podium, totaling

⁴¹ Knapp Architects, 2009, *Historic Resource Evaluation Report Fairmont Hotel 950 Mason Street*, August. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

⁴² San Francisco Planning Department, 2010, *Historic Resource Evaluation Response: 950 Mason Street: The Fairmont Hotel*, March 12. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

620,656 gross square feet (gsf) (including about 145,500 gsf of below-grade parking). The new residential tower would be located on the northeastern corner of the site above the podium and enclosing the north side of the podium courtyard. The mid-rise residential component would enclose the podium courtyard level along the east and south sides. The proposed new tower and podium would contain approximately 160 residential units, 3,776 gsf of retail space, and an 80,500 gsf addition to the parking garage.

Potential impacts to the historic 1906 Fairmont Hotel could result from the proposed interior and exterior renovations to that resource during construction on the project site. The project sponsor may also include the possible reconfiguration of guest rooms in the historic 1906 Fairmont Hotel in floors three through seven to consolidate standard rooms to create larger guest rooms. The proposed demolition of the existing hotel tower and podium structure would result in the demolition of the Tonga Room.

IMPACT EVALUATION

Impact CP-1a The proposed project would cause a substantial adverse change in the significance of the 1906 Fairmont Hotel, an historic resource. (Less than Significant with Mitigation) [Criterion D.a]

The following impacts discussion incorporates analysis and procedures outlined in the HRE Response prepared by the San Francisco Planning Department, as well as technical documentation such as the Construction Management Plan⁴³ that outlines work that would be conducted as part of the proposed project and a stabilization plan⁴⁴ that outlines the proposed work in the historic 1906 Fairmont Hotel related to the guest rooms, Cirque Room, and Venetian Room.

Historic 1906 Fairmont Hotel – Guest Rooms

The proposed possible consolidation of guest rooms includes the retention of the character-defining features associated with the guest rooms. The information developed by the project sponsor's historic architect/preservation consultant, Page & Turnbull,⁴⁵ as well as implementation of **Mitigation Measure M-CP-1a**, pp. IV.D-35 to IV.D-36, would address the character-defining features of the historic 1906 Fairmont Hotel in a sensitive manner and appears to conform to the *Secretary of the Interior's Standards for Rehabilitation*. Thus, any potential impacts would be reduced to less than significant.

⁴³ Conversion Management Associates, 2010, *Construction Management Plan*, March. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

⁴⁴ Skaggs, Elisa. Page & Turnbull. February 18, 2010 Memorandum to Glenn Isaacson of CMA, *Re: Interior Renovations: Fairmont Hotel Revitalization and Residential Tower Project*. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

⁴⁵ Ibid.

Historic 1906 Fairmont Hotel Exterior

The exterior character-defining features of the historic 1906 Fairmont Hotel building include all architectural materials, finishes, fixtures, details, windows, and attached structures on all exterior elevations, including rooflines associated with the historic 1906 design as well as the circa 1927 penthouse addition. Work proposed for the exterior of the historic 1906 Fairmont Hotel includes the removal of previously installed insensitive cladding materials on the California Street elevation; the alteration of the loading dock door on the Sacramento Street elevation; the removal of the existing pass-through and the construction of a new connector from the historic 1906 hotel at the location of the Cirque Room to the proposed podium; and repairs to the existing ventilation louvers.

Historically, the main entrance to the historic 1906 Fairmont Hotel has always been a prominent feature from Mason Street. The design details of the Mason Street elevation were carried around the building, as was the application of high quality finished architectural materials. While the lobby off of Mason Street represents the formal welcoming space for the hotel, historic depictions of the hotel's exterior at California and Powell Streets were also commonly presented.

While the existing hotel tower and podium (constructed in the 1960s) has obscured the historic setting of the 1906 Fairmont Hotel, the hotel still retains a high level of historic integrity and is considered a resource for the purposes of CEQA (see Setting discussion above). A portion of the proposed podium structure would increase from the existing 50-feet in height to 105-feet to accommodate the proposed mid-rise residential component with its residential units and design features. The proposed residential tower would be similar in height compared to the existing tower (317-feet) with the exception of the 11-foot-tall mechanical penthouse, which is exempt from the measurement of height under the Planning Code.⁴⁶ The area currently occupied by the passageway to the Pavilion Room would also accommodate additional residential units and a hotel spa.

The east elevation of the historic 1906 Fairmont Hotel would continue to remain visible, particularly from the publicly-accessible areas on the proposed podium rooftop open space (landscaped courtyard). View sheds towards the east elevation from the adjacent public right-of-way would be incrementally diminished by the proposed project, which would impact the integrity of setting and feeling of the identified historic resource. However, in comparing the relationship of the existing podium and tower with the historic 1906 Fairmont Hotel, the additional 11-foot mechanical penthouse for the proposed tower and the mid-rise

⁴⁶ The 11-foot-tall mechanical penthouse is exempt from height measurements under Planning Code Section 260(b)(1)(A)(B).

residential component (55 feet taller than the existing 50-foot-tall podium) would not materially impact the historic hotel in a manner that would no longer convey its significance. All character-defining features associated with the exterior of the 1906 Fairmont Hotel would remain intact and visible. While this impact would be less than significant, implementation of **Improvement Measure I-CP-1a**, pp. IV.D-35 to IV.D-36 recommends that a 20-foot setback of the residential units and spa area located above the California Street Wall would preserve the historic 1906 Fairmont Hotel's integrity of setting and feeling.⁴⁷ Although under CEQA this impact would be less than significant without mitigation, City decision-makers, including the Planning Commission, may impose this measure as a condition of approval on the proposed project where warranted by project effects.

The proposed scope of the work for the exterior rehabilitation work to the historic 1906 Fairmont Hotel as outlined by Page & Turnbull^{48,49} addressed the character-defining features of the historic Fairmont Hotel in a sensitive manner and conforms to the *Secretary of Interior's Standards for Rehabilitation*. Thus, any potential impacts would be reduced to a less-than-significant level.

Venetian Room

The proposed project would rehabilitate the adjacent Venetian Room, which is located on the lobby level, adjacent to an existing, screened mechanical equipment area on the western portion of the existing podium's landscaped courtyard. The Venetian Room was altered in the 1960s to accommodate a stage within the three arched window bays along the east wall of the historic 1906 Fairmont Hotel. These alterations lie outside of the Fairmont Hotel's period of significance. As part of the proposed project, the stage would be removed and the three arched window openings would be reintroduced and the design of the windows and the openings would be compatible with the materials and design of the existing adjacent historic 1906 Fairmont Hotel windows. However, these reconstructed arched windows would operate as double doors that would lead to the new landscaped courtyard area, similar to the original construction and function of this portion of the historic 1906 Fairmont Hotel.⁵⁰

The work pertaining to the Venetian Room is intended to restore both the interior and exterior at the stage location to an appearance more closely equated with its historic condition. Schematic details developed

⁴⁷ San Francisco Planning Department, 2010, pp. 14-15.

⁴⁸ Skaggs, Elisa. Page & Turnbull. November 17, 2009 Memorandum to Glenn Isaacson of CMA, *Re: Temporary Opening at California Street Wall*.

⁴⁹ Page & Turnbull, 2009, Certificate of Appropriateness Appendix to the San Francisco Planning Department, Fairmont Hotel Revitalization, Revised November, Case No. 2008.0081A.

⁵⁰ Skaggs, Elisa. Page & Turnbull. February 18, 2010 Memorandum to Glenn Isaacson of CMA, *Re: Interior Renovations: Fairmont Hotel Revitalization and Residential Tower Project*.

IV. Environmental Setting, Impacts, and Mitigation
D. Cultural and Paleontological Resources

by Page & Turnbull for the stage removal and the exterior rehabilitation appear to be sensitive and conform to the *Secretary of the Interior's Standards for Rehabilitation*. While additional information will be necessary to fully evaluate the scope of work for the Venetian Room, implementation of **Mitigation Measure M-CP-1a**, pp. IV.D-35 to IV.D-36, would reduce this impact to a less-than-significant level.

Historic 1906 Fairmont Hotel – Connection between Terrace Room and New Grand Ballroom

The existing Terrace Room is proposed to be connected through a series of openings to the new Grand Ballroom. The existing Terrace Room does not possess any character-defining features associated with the historic 1906 Fairmont Hotel and the proposed project work for this component appears to avoid adversely impacting any of the character-defining features associated with the historic 1906 Fairmont Hotel. Therefore the Planning Department believes that the proposed scope of work would not result in an adverse impact upon the historic 1906 Fairmont Hotel.⁵¹

Exterior Connections between the historic 1906 Fairmont Hotel and the New Podium and Tower

The proposed connections between the residential tower and podium structures are designed to be incorporated visually and physically with minimal disturbance to the historic 1906 Fairmont Hotel. The information developed by the project sponsor's historic architect/preservation consultant, Page & Turnbull,^{52,53} as well as implementation of **Mitigation Measure M-CP-1a**, pp. IV.D-35 to IV.D-36, would ensure that all construction procedures under the proposed project would avoid alterations of character-defining features of the historic 1906 Fairmont Hotel as per the *Secretary of the Interior's Standards for Rehabilitation* during project implementation. Implementation of this mitigation measure would reduce the impact to exterior connections between the 1906 Fairmont Hotel and the proposed development to a less-than-significant level.

California Street Wall

The historic 1906 Fairmont Hotel featured a pair of two-story wings placed symmetrically on the east elevation of the hotel. Each wing was an extension of the building base extruded towards Powell Street. The California Street Wall is a façade (attached to the existing podium structure), the only remaining element of these wings. A seismic joint would be introduced at the location where the California Street

⁵¹ San Francisco Planning Department, 2010, p. 17.

⁵² Skaggs, Elisa. Page & Turnbull. November 17, 2009 Memorandum to Glenn Isaacson of CMA, *Re: Temporary Opening at California Street Wall*.

⁵³ Page & Turnbull, 2009, Certificate of Appropriateness Appendix to the San Francisco Planning Department, Fairmont Hotel Revitalization, Revised November, Case No. 2008.0081A.

Wall abuts the historic 1906 Fairmont Hotel as part of the proposed project. In addition, the westernmost window closest to street grade would be converted into an egress door. Material at and below the window sill would be removed and a threshold and door would be installed. The proposed project also includes the documentation, removal, salvage, and reconstruction of an approximately 16 x 16 square foot area for temporary vehicle access during the proposed project construction. With the exception of the aforementioned seismic joint and egress door, much of the proposed work on the California Street Wall would constitute a temporary (36 months), short-term impact through the removal, reinstallation, or replacement of the historic fabric of the California Street Wall at the location of the temporary 16 x 16 square foot opening. Proposed plans prepared by Page & Turnbull for the temporary opening are described and is an appendix to the Construction Management Plan and the Request for a Certificate of Appropriateness.⁵⁴ The proposed alteration to historic fabric would be sensitive to the resource and would conform to the *Secretary of the Interior's Standards for Rehabilitation*.⁵⁵ Thus, any potential impacts would be reduced to less than significant.

Cirque Room of Historic Hotel

The Cirque Room within the historic 1906 Fairmont Hotel would undergo minor alteration as a result of the proposed project. An existing passageway located at the south end of the bar, which currently leads to a dishwashing room, would be modified to connect the Cirque Room to the proposed retail/restaurant spaces to the west. Whereas only a small amount of historic material would be affected, the work proposal provided by the project sponsor's historic architect/preservation consultant, Page & Turnbull, would address the character-defining features of the historic resource in a sensitive manner and appears to conform to the *Secretary of the Interior's Standards for Rehabilitation*.⁵⁶ Thus, any potential impacts would be reduced to less than significant.

M-CP-1a: Historical Resource Mitigation Measure; Apply the Secretary of the Interior's Standards

All restoration work, including window and door details; interior repair and finish details; specifications and notations that explain a stabilization and protection plan in order to minimize loss or damage of historic fabric shall be developed by an architect that meets the *Secretary of the Interior's Professional Qualification Standards*. This information shall be included in the site permit sets and final construction

⁵⁴ Conversion Management Associates, 2010, *Construction Management Plan*, March. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

⁵⁵ Skaggs, Elisa. Page & Turnbull. November 17, 2009 Memorandum to Glenn Isaacson of CMA, *Re: Temporary Opening at California Street Wall*.

⁵⁶ Skaggs, Elisa. Page & Turnbull. February 18, 2010 Memorandum to Glenn Isaacson of CMA, *Re: Interior Renovations: Fairmont Hotel Revitalization and Residential Tower Project*.

IV. Environmental Setting, Impacts, and Mitigation
D. Cultural and Paleontological Resources

drawings. All proposed work shall be based on physical and pictorial evidence; all historic character-defining materials shall be retained and repaired when possible. All work associated with the historic 1906 Fairmont Hotel shall meet the *Secretary of the Interior's Standards*.

Venetian Room

All restoration work, including window and door details; interior repair and finish details; specifications and notations that explain a stabilization and protection plan in order to minimize loss or damage of historic fabric shall be developed by an architect who meets the *Secretary of the Interior's Professional Qualification Standards*. This information shall be included in the site permit sets and final construction drawings. All proposed work shall be based on physical and pictorial evidence; all existing historic material should be retained and repaired where possible.

I-CP-1a: New Addition (Podium, Spa Area, Residential Townhouses, and Tower) to the Fairmont Hotel

The residential units and spa area located above the California Street Wall should be set back a minimum of 20 feet. The setback should be clear of all projections and obstructions, such as bays, trellis structures, balconies, and exterior walkways in order to provide visibility of the Powell Street elevation and give visual relief to the California Street Wall below.

Tonga Room

Impact CP-1b The proposed project would cause a substantial adverse change in the significance the Tonga Room, an historic resource (Significant and Unavoidable Impact) [Criterion D.a]

The Tonga Room is located in the existing podium structure proposed to be demolished as part of the proposed project. The proposed demolition would remove all character-defining features of the Tonga Room and this would constitute a substantial adverse change. Relocation of the Tonga Room is not part of the proposed project.

The Tonga Room is not specifically included in the 2001 NRHP nomination of the Fairmont Hotel. However, as previously discussed on p. IV.D-24, based on the HRE prepared by Knapp Architects and the HRE prepared by the Planning Department⁵⁷, the Tonga Room appears to be eligible for the CRHR. The proposed demolition of the Tonga Room would therefore be considered a significant impact to a historic resource under CEQA.

⁵⁷ These documents are available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E

A survey and documentation for the Historic American Building Survey (HABS) (or similar level of photo documentation) would preserve a record of the Tonga Room (See **Mitigation Measure M-CP-1b**, pp. IV.D-37 to IV.D-39). However, this mitigation measure would not reduce the impact to a less-than-significant level. The proposed project would result in a significant and unavoidable impact to the Tonga Room, even with the implementation of **Mitigation Measure M-CP-1b**.

Alternatives to the proposed project as they pertain to the Tonga Room are discussed in more detail in Chapter VI, Alternatives.

M-CP-1b: HABS Level I Documentation, Stabilization, & Salvage

If the affected historic resource (Tonga Room) can neither be preserved at its current site, nor moved to an alternate site and it is to be demolished, a conservation team that meets the *Secretary of the Interior's Professional Qualification Standards* shall document, stabilize, and salvage the character-defining features, associated with the affected historic resource, for their storage in a secure climate-controlled location and in a manner to be protected from accelerated deterioration, theft, vandalism, damage, rodents and pests, or adverse environmental conditions. Character-defining features noted as ephemeral finishes, such as wallpaper and the significant features of the lagoon, which are found in large quantities, do not need to be salvaged in their entirety. They shall be salvaged in quantities suitable for educational purposes and/or replication in an alternate location. The documentation, stabilization, and salvage program shall remove and retain all of the Tonga Room's character-defining features for public information and education, and/or reuse in an alternate off-site location. Demolition may proceed only after character-defining features have been documented in their historic locations and their removal has been completed. A similar process is outlined in the National Park Service's Preservation Brief 31; Mothballing Historic Buildings.⁵⁸ This component shall include three sub-tasks: Conditions Assessment, Stabilization of Character-Defining Features, and Salvage of the Tonga Room. These three sub-tasks are described below:

The documentation shall follow the HABS Level I standards and would consist of the following:

- Drawings: A full set of measured drawings depicting existing or historic conditions: including the locations of all objects identified as character-defining features and their relationship to one another. These drawings may be based on the existing historic drawings associated with the Tonga Room and amended, with all dimensions clearly labeled, to reflect the as-built conditions

⁵⁸ Park, Sharon C., 1993. *Preservation Briefs: 31 Mothballing Historic Buildings*, Technical Preservation Services, National Parks Service: U.S. Department of the Interior. Washington, D.C.

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

and amended accordingly provided that all amendments are based on existing or documentary evidence.

- Photographs: photographs with large-format negatives of exterior and interior views; including views of the band boat docked and extended into the lagoon as well as photographs of the half-hourly thunderstorm; photocopies with large-format negatives of selected historic views where available. Photographs shall follow the HABS/HAER Photographic Specifications. Assuming original drawings of the Tonga Room are available, photographic negatives/prints of the plans shall be produced to archival standards.
- History and description: The written data shall be compiled from the historic resources descriptions and histories prepared for this EIR and incorporate additional research to create a detailed history and context for this resource.

The documentation shall be undertaken by a qualified professional meeting the standards for Architectural History, or Historic Architecture, set forth by the Secretary of the Interior (*Secretary of the Interior's Professional Qualifications Standards, 36 CFR 61*) in consultation with a preservation specialist assigned by the San Francisco Planning Department. The professional in Architectural History or Historic Architecture shall undertake the documentation and submit it for review and approval by the Planning Department's preservation specialist. The project sponsor shall submit the documentation package to the San Francisco Planning Department. The Planning Department shall determine the adequacy of the documentation before any permit for demolition is granted. When complete, the documentation shall be submitted to the History Room of the San Francisco Public Library and to the San Francisco Planning Department.

The conditions assessment and stabilization shall consist of the following:

- An examination of the character-defining features of the Tonga Room to identify the degree of any potential deterioration or if there are significant interior architectural elements that would need special protection during the mothballing period.
- The conditions assessment shall outline any priorities for repairs necessary to stabilize the character-defining features of the property for both the short- and long-term relocation off of Fairmont Hotel property at a storage facility. The conditions assessment shall evaluate the age and condition of Tonga Room's character-defining features.
- The conditions assessment shall rate the architectural features of the Tonga Room on a scale of their importance to the integrity and significance of the resource. Those features of the Tonga room of the highest priority shall receive preference when repairs or protection measures are

outlined as part of the mothballing process. Potential challenges associated with the protection of special features shall be identified, so that appropriate interim solutions can be implemented.

- Stabilization shall address any potential deficiencies in order to curtail the deterioration of the character-defining features of the Tonga Room, while they are removed and stored. This process shall reinforce any features that may be in jeopardy of failure during the salvage process.
- Stabilization would include structural stabilization, pest control, and moisture prevention so that the character-defining features are preserved for educational study or reuse.

The salvage and storage of character-defining features shall consist of the following:

- All identified character-defining features, including those noted as ephemeral finishes, such as wallpaper and the significant features of the lagoon, which are found in large quantities shall be salvaged in quantities suitable for educational purposes and/or replication in an alternate location; and shall be dismantled or removed using the gentlest means possible and shall be packed for long term storage. Additionally, the character-defining features shall be packed and protected from moisture damage and other potential salvage hazards.
- The primary goal of the storage effort shall involve the control of the long-term deterioration of the character-defining features.
- A maintenance and monitoring plan for protection of the character-defining features while in storage and in preparation for use in public information and education, or reuse in an alternate off-site location shall be developed and implemented.
- Once the character-defining features of the Tonga Room are dismantled and stabilized, the project sponsor or a hired custodian specializing in the storage of fine art and fragile objects shall conduct periodic maintenance and surveillance monitoring.
- The maintenance and surveillance monitoring shall consist of monthly checks of storage conditions, packaging, moisture damage, and evidence of pest intrusion etc.
- An annual (every year) conditions report shall be submitted to Planning Department Preservation Staff and the President of the Historic Preservation Commission that summarizes the general conditions of the objects as monitored during the monthly maintenance and surveillance monitoring. If applicable, the report should include any additional stabilization, protection, and/or the remediation of any other potential salvage hazards that transpired over the year.

Impact CP-1c The proposed project could cause a substantial adverse change in the significance of the potential Residential Apartment Historic District (Less than Significant with Mitigation) [Criterion D.a]

As discussed previously (pp. IV.D-27 to IV.D-29), based upon the survey work done by December 2009 Garavaglia Architecture survey report of the eight-block area surrounding the Fairmont project block, it

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

was determined that there are a number of potential historic districts located in the area immediately surrounding the project site, including the potential Social Club Thematic district, the potential Luxury Hotel Thematic district, and the potential Residential Apartment district. The identified potential thematic districts (ie. the potential Social Club Thematic district and potential Luxury Hotel Thematic district) include a number of sites outside of the project study area and would be delineated though discontinuous geographic boundaries. The San Francisco Planning Department has therefore determined that the proposed project would not have an impact upon these discontinuous potential thematic historic districts; however, it could have an impact upon the potential Residential Apartment historic district.

The HRER concludes that the proposed design of the residential tower, mid-rise and podium structure at the Fairmont Hotel complex does not strongly relate to the character-defining features associated with the potential Residential Apartment historic district or the 1906 Fairmont Hotel. As noted previously, based on survey work conducted by Garavaglia Architecture,⁵⁹ this potential Residential Apartment historic district is characterized by relatively large (20 or more units) apartments buildings with no commercial spaces on the lower floors. They range from four to 10 or more stories and are a mixture of wood-frame with a masonry façade and concrete/steel construction. Most have elaborate entrances with marble cladding and detailed reliefs executed in concrete or stucco. Large wood windows predominate, and some have leaded glass accents on the lower floors. Most were constructed between 1906 and 1930 during the post-earthquake, Pan-Pacific Exposition and 1920s building booms. Many are corner buildings that anchor whole blocks. Some are accompanied by dedicated parking structures as well. In addition, the area surrounding the hotel site contains a potential district of residential apartment hotels that features a variety of architectural styles ranging from Gothic, Renaissance, Baroque, to Art Deco and Art Moderne.

The existing podium and tower are not contributors to the potential historic district and removal of the existing podium and hotel tower would not have an adverse impact on the potential Residential Apartment historic district. However, the design of the proposed residential tower and podium would be discordant with the character-defining features and could result in a potentially significant impact to the potential Residential Apartment historic district's integrity of design, setting, and feeling. Implementation of **Mitigation Measure M-CP-1c**, discussed below, would reduce this impact to a less-than-significant level.

⁵⁹ Garavaglia Architecture, Inc., 2009, *Fairmont Hotel, Nine Block Study Area Reconnaissance Survey Report*. Prepared for CMA Inc. December 11. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2008.0081E.

M-CP-1c: Potential Residential Apartment Historic District

The exterior envelope of the proposed podium and tower shall reference the character-defining features of the potential district and the historic Fairmont Hotel without creating a false sense of history. An analysis diagram that provides the basis for the design and those character-defining features that were referenced shall be included as part of the project submitted to the Planning Department prior to project approval to provide a better understanding for the design approach. Additionally, the following revisions to the proposed design shall be implemented:

- The design of the exterior of the proposed podium and tower shall reference the exterior stylistic characteristics of the buildings within the district without creating a false sense of history. Specifically, the proposed exterior cladding materials and finishes shall be contemporary yet compatible with the historic cladding materials and finishes found on contributors within the potential district.
- The overall composition of the proposal shall exhibit a base, shaft, capital façade arrangement. The top and/or roofline of the tower shall exhibit a strong finish or termination as seen elsewhere on contributing buildings within the district and the mechanical penthouse shall be integrated into the overall design;
- The podium shall exhibit a rhythm and scale that strongly relates to the adjacent historic buildings associated with the identified potential historic district that are located along Powell, California, and Sacramento Streets;
- The fenestration pattern along the shaft of the tower shall be redesigned to have a uniform rhythm and organization as exhibited elsewhere in the district;
- The trellis structures attached to the exterior of the proposed podium and tower shall be eliminated from the project; and,
- A visually prominent residential entry shall be introduced on either the Powell or California Street elevations.

Unknown Subsurface Archaeological Resources

Impact CP-2 The proposed project could potentially damage or disturb unknown subsurface archaeological resources. (Less than Significant with Mitigation) [Criteria D.b and D.c]

No prehistoric resources are expected within the project area but features associated with the 19th century D. Parker residence or “Casa del Mar” boarding house may be present. The proposed project would require subsurface excavation for the two additional levels of underground parking. This may have the potential to damage or disturb unknown subsurface archaeological deposits beneath the site. Historic-

IV. Environmental Setting, Impacts, and Mitigation
D. Cultural and Paleontological Resources

period archaeological deposits associated with the former D. Parker residence (c. 1865–1890s) and Casa del Mar boarding house (c.1890s–1906) may be present in the project site. Excavation for the underground parking into previously undisturbed areas could encounter archaeological deposits. Implementation of **Mitigation Measure M-CP-2**, pp. IV.D-42 to IV.D-45 requires archaeological monitoring on the project site by a qualified archaeologist in consultation with the Environmental Review Officer (ERO). This would reduce impacts on archaeological resources to a less-than-significant level.

M-CP-2: Archeological Mitigation Measure II (Monitoring)

Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological monitoring program. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archeological monitoring program (AMP). The archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the project archeologist shall determine what project activities shall be archeologically monitored. In most cases, any soils disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the potential risk these activities pose to archaeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected

resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;

- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with the archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction crews and heavy equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO.

If the ERO in consultation with the archeological consultant determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- B) An archeological data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

If an archeological data recovery program is required by the ERO, the archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The project archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archeological consultant shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research

IV. Environmental Setting, Impacts, and Mitigation

D. Cultural and Paleontological Resources

questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.
- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.
- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.
- *Interpretive Program.* Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains, Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any

discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the draft final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Impact CP-3 The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant) [Criterion D.c]

While various authors have reported the presence of marine invertebrate fossils in the Franciscan Assemblage throughout California, the Franciscan generally does not contain vertebrate fossils. Therefore, the Franciscan Assemblage is considered to have a low paleontological sensitivity. Since no previously recorded fossils have been recovered from the project site, and the project site is located in a rock unit with a low paleontological sensitivity for vertebrate fossils, it is unlikely that unique paleontological resources would be encountered in sediments at the project site, and there would be no impact.⁶⁰⁻⁶¹⁻⁶²

CUMULATIVE IMPACTS

Cultural and paleontological resource impacts are generally localized and site specific. The project's significant unavoidable impact to the Tonga Room is not cumulatively considerable, because it is a localized and site-specific impact. Cumulative future development in the project area would be subject to review on a case-by-case basis, as required by CEQA, and pursuant to the Planning Department

⁶⁰ Jefferson G.T., 1991, *A catalogue of late Quaternary vertebrates from California, part one, nonmarine lower vertebrate and avian taxa*. Natural History Museum of Los Angeles County, Technical Reports, Number 5.

⁶¹ Jefferson, G.T., 1991, *A catalogue of late Quaternary vertebrates from California, part two, mammals*. Natural History Museum of Los Angeles County, Technical Reports, Number 7.

⁶² University of California Museum of Paleontology, 2009, *Museum of Paleontology Database*. Accessed: September 2009.

IV. Environmental Setting, Impacts, and Mitigation
D. Cultural and Paleontological Resources

Preservation Bulletin 16, and the Historic Preservation Commission, similar to the review for the proposed project. This process would reduce the cultural and paleontological impacts of cumulative projects to less-than-significant levels. Therefore, the proposed project would have a less-than-significant cumulative impact related to cultural and paleontological resources.

MITIGATION AND IMPROVEMENT MEASURES

MITIGATION MEASURES

Implementation of **Mitigation Measures M-CP-1a, M-CP-1c, and M-CP-2** above, would reduce potential cultural and paleontological resource impacts to less-than-significant levels. The proposed project would result in a significant unavoidable impact to the Tonga Room, even with implementation of **Mitigation Measure M-CP-1b**.

IMPROVEMENT MEASURES

Implementation of **Improvement Measure I-CP-1a** could be implemented to further reduce less-than-significant impact to the historic 1906 Fairmont Hotel from the new addition (podium, spa area, residential townhouses, and tower). Although not required by CEQA, City decision-makers, including the Planning Commission, may impose this measure as a condition of approval on the proposed project where warranted by project effects.