



*Preserving America's Heritage*

February 20, 2013

Ms. Helene Whitson  
Director  
Save the Laguna Street Campus  
1824 Arch Street  
Berkeley, CA 94709

Ref: *Proposed Housing Development at 55 Laguna Street  
City of San Francisco, California*

Dear Ms. Whitson:

Thank you for your recent correspondence regarding the referenced undertaking. Based on your inquiries, we requested the undertaking's administrative record, including all efforts to comply with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800), from the City and County of San Francisco (City). We understand that HUD has provided Community Development Block Grant funds to the City and pursuant to HUD's environmental regulations at 24 CFR Part 58, the City is acting as the Responsible Entity for compliance with applicable environmental laws, including NHPA. For the purposes of Section 106, the City's Mayor's Office of Housing is the agency official.

The undertaking consists of the construction of 440 housing units and community facilities at the San Francisco State Teacher's College located at 55 Laguna Street. Of these units, 110 units will be available as affordable senior housing. The San Francisco State Teacher's College consists of 5 buildings, which together comprise a historic district listed on the National Register of Historic Places (NRHP) for its significance relating to the history of state normal schools in California and to projects carried out by the Works Progress Administration (WPA). As a result of the undertaking, 3 buildings will be rehabilitated and the remaining two buildings will be demolished. The City determined this undertaking would constitute an adverse effect on the historic district under 36 CFR Part 800.

While the ACHP declined to participate in consultation for this undertaking, the City continued consultation with many consulting parties, including the Save the Laguna Street Campus group. Based on these consultations, a Memorandum of Agreement (MOA) was executed in September 2012 that includes stipulations regarding photographic documentation of the buildings to be demolished and the development of an interpretive program for the history of the WPA-era associations of the building. The MOA also includes the development of a preservation plan prior to any renovation activities that addresses the protection of significant interior features within the buildings, including any WPA-era murals and mosaics. Further, the construction of the new buildings will be compatible with the remaining historic buildings to ensure integrity of setting within the historic district.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004  
Phone: 202-606-8503 • Fax: 202-606-8647 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)

Based on our review of the extensive documentation provided by the City, it appears that the City has appropriately conducted its Section 106 review by seeking and considering the views of consulting parties and the public. Numerous opportunities were provided for consulting parties to engage in consultation and to contribute to the resolution of adverse effects. After considering the comments received from consulting parties and incorporating many of the comments into a mitigation plan, the City executed an MOA that includes adequate mitigation for the undertaking's adverse effects. Accordingly, we see no reason to reopen the Section 106 process for this undertaking, and will consider the MOA and its implementation as appropriate steps to comply with Section 106.

We appreciate your concern in this matter. Should you have any additional input to share with the City regarding this matter, please contact Mr. Eugene Flannery at (415) 701-5598 or via email at [Eugene.flannery@sfgov.org](mailto:Eugene.flannery@sfgov.org). If you have any questions regarding our comments, please contact Ms. Jaime Loichinger at (202) 606-8529 or via email at [jloichinger@achp.gov](mailto:jloichinger@achp.gov).

Sincerely,



Charlene Dwin Vaughn, AICP  
Assistant Director  
Office of Federal Agency Programs  
Federal Permitting, Licensing and Assistance Section