



Memorandum

To: Eoanna Goodwin and Kerstin Kalchmayr
San Francisco Recreation and Park Department
49 South Van Ness Avenue, Ste. 1420
San Francisco, CA 94103

Project: Japantown Peace Plaza Renovation and Pagoda Seismic Retrofitting
Project Area of Potential Effects

ARG Project No.: 180520.14

Date: July 11, 2023

Via: Email

From: Jon Rusch and Sarah Hahn, Architectural Historian and Preservation
Planner

Cc: Lorena Guadiana, Mayor's Office of Housing and Community
Development
Allison Vanderslice, San Francisco Planning Department

At the request of the San Francisco Recreation and Park Department (RPD), Architectural Resources Group has prepared an Area of Potential Effects (APE) map for the Japantown Peace Plaza Renovation and Pagoda Seismic Retrofitting Project. The APE map, included with this memorandum as Attachment A, will support the Mayor's Office of Housing and Community Development's compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 Code of Federal Regulations Part 800. Section 106 requires that federal agencies and their delegated entities consider the effects of federal undertakings on properties listed in or eligible for listing in the National Register of Historic Places (National Register). The current project qualifies as a federal undertaking because RPD has been awarded grant funding from the U.S. Department of Housing and Urban Development (HUD). The Mayor's Office of Housing and Community Development has Section 106 authority delegated through a Programmatic Agreement between HUD and the California State Historic Preservation Officer for such undertakings.

Delineation of an APE is an early step an agency must take before identifying the historic properties that have the potential to be affected by an undertaking. As defined in 36 CFR Part 800.16(d), an APE is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” In instances where the undertaking has limited potential to change the visual, audible, and atmospheric characteristics of a project site in a manner that could be discerned from nearby areas, it may be appropriate to limit an APE to the boundaries of that project site. In other instances, an APE may extend beyond a project site and include surrounding properties, which would allow the investigation to consider potential changes in the setting of nearby National Register-listed and -eligible historic properties.

The current undertaking would involve a renovation of the Japantown Peace Plaza and seismic interventions to the Japantown Peace Pagoda. The renovation will include waterproofing, new planting, shade structures, paving, seating, lighting, and potential structural reinforcement of the plaza (if deemed necessary). Additionally, to address seismic safety concerns following a structural analysis, a seismic retrofit is proposed for the Japantown Peace Pagoda. The seismic reinforcement recommendations include the following interventions: steel reinforced tendons/cables that run externally along the long side of each column; stainless steel plate reinforcement added to the connecting joints between existing adjoining concrete roof panels; increased massing/depth on the horizontal roof ringbeams where they are connected to the columns at each; and carbon fiber and several Fiber Reinforced Polymer strips at each column until the third story roof.

In consideration of the activities proposed as part of the HUD-funded undertaking, Architectural Resources Group proposes that the APE should be defined as the boundary of the Japantown Peace Plaza, which corresponds to the legal parcel associated with Assessor’s Parcel Number (APN) 0700/022. The proposed APE also contains APN 0700/023, a parcel surrounding the footprint of the Japantown Peace Pagoda that is entirely encompassed within the larger APN 007/002. Therefore, the boundary of the proposed APE is limited to the extent of work proposed by the project. Because the Japantown Peace Plaza is located on the roof of a parking garage, the plaza renovation will not require any ground disturbance below the floor of the garage structure. Therefore, it is not necessary to consider a vertical APE that extends below ground surface.

An APE that is tightly defined to the project site appears appropriate for the undertaking for the following reasons:

- Renovation of the Japantown Peace Plaza would introduce new amenities that are generally consistent with the types of amenities currently in place (i.e., paving, seating, and lighting), although the new features would have a new design. The renovation does not propose any new large-scale construction that would alter the open character of the plaza’s landscape. Furthermore, previously prepared historical documentation of the plaza explains that the original 1960s-era landscape design of the plaza was extensively renovated during the 1990s and early 2000s, which removed the majority of its original landscape features.¹ For these reasons, it appears unlikely that the proposed renovation would remove features that contribute to the historical settings of surrounding National Register properties, were they to be identified.
- The proposed seismic strengthening of the Japantown Peace Pagoda would involve changes to the structure that are anticipated to be visible to pedestrians within the plaza—specifically the column reinforcement tendons and carbon fiber wrapping. However, it does not appear that the interventions would be plainly discernible from vantagepoints further away, or would represent a visual change so intrusive as to pose a potential effect on the historic setting of any adjacent National Register properties. During the California Environmental Quality Act Review process, the San Francisco Planning Department supported a Categorical Exemption determination for the project (Environmental Case File No. 2019-000895ENV).² Although this determination was separate from the Section 106 review process, the San Francisco Planning Department’s previous review indicates the proposed seismic strengthening would comply with the Secretary of the Interior’s Standards for Rehabilitation and is generally compatible with the historic character of the pagoda and the plaza.
- The project does not propose to alter any components of water and sewer infrastructure that extend beyond the parcel containing the Japantown Peace Plaza.

¹ San Francisco Planning Department, *Draft Landmark Designation Report: Peace Pagoda & Peace Plaza*, April 14, 2015, 24-28

² San Francisco Planning Department, CEQA Exemption Determination, Case No. 2019-000895ENV, Japantown Peace Plaza—1610 Geary Boulevard, February 2, 2023.

- Lastly, delineating a limited APE is consistent with the approach recently taken during Section 106 consultation for a park improvement project in San Francisco. Earlier in 2023, RPD supported Section 106 consultation for the Buchanan Street Mall Renovations project, which received a grant from the National Park Service and therefore was an undertaking subject to Section 106 review. This previous undertaking proposed improvements to the Buchanan Street Mall, including new recreation features, pathways, lighting, seating, and gardens/planting areas—activities that are generally consistent with those proposed by the Japantown Peace Plaza Renovation and Pagoda Seismic Retrofitting Project. RPD’s consultant proposed an APE that was limited to the boundary of the Buchanan Street Mall and did not extend to include adjacent properties.³ Therefore, the previous APE reflects the low potential of this type of park improvement project to diminish the setting of surrounding properties. The State Historic Preservation Officer reviewed and concurred with the APE proposed for the Buchanan Street Mall Renovations project.

³ PaleoWest, *Cultural Resource Assessment for the Buchanan Street Mall Renovations Project, City and County of San Francisco, California*, prepared for the San Francisco Recreation and Park Department, May 12, 2023, 4-5.