

From: [Jonathan Bünemann](#)
To: [BOS Legislation, \(BOS\)](#)
Subject: File No. 231285 - Appeal of California Environmental Quality Act Determination of Exemption for Environment Review - Proposed 2395 Sacramento Street Project.
Date: Wednesday, January 31, 2024 1:19:27 PM
Attachments: [Northern Neighbors Support 2395 Sacramento Street.pdf](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Clerk of the Board of Supervisors,

Please find attached the Northern Neighbors support letter for the matter
File No. 231285 - Appeal of California Environmental Quality Act Determination of Exemption for Environment Review - Proposed 2395 Sacramento Street Project.

Please let me know if you have any questions!

Jonathan Bünemann,
Northern Neighbors



COW HOLLOW, MARINA, PACIFIC HEIGHTS
LAUREL HEIGHTS, AND THE PRESIDIO

Letter in support of 2395 Sacramento Street

Pacific Heights, January 29th 2024

Dear Supervisors,

Northern Neighbors reiterates our enthusiastic support of the proposed project at 2395 Sacramento Street. This project would convert an underutilized property into 24 new units of housing, including 3 below-market-rate units. This is a net addition of 24 units to our Pacific Heights neighborhood, which is in desperate need of as much housing as possible. Pacific Heights in particular has rare infill development opportunities. As residents, we would be excited to welcome more neighbors and enable them to enjoy this wonderful part of San Francisco.

Both the Historic Preservation and Planning Commissions voted unanimously in support of the streamlined environmental review of this project, with many members expressing excitement about this project for how it thoughtfully incorporates its historic context and preservation. Public comment, including by our members, shows the substantial community support for this project.

With this CEQA appeal, the appellant asks you to politically intervene in a project that has broad city-wide support and many supporters in the neighborhood. The appeal asserts unsupported legal provisions to "nimby" this project's streamlined environmental review under the pretext of historic preservation concerns. As a neighborhood group, Northern Neighbors strongly rejects this, not just because we love this particular project, but also because upholding this appeal would set a dangerous precedent of rejecting General Plan Evaluation as a method of determining environmental impact, thus further escalating building costs in San Francisco.

Based in northern San Francisco and centered around Pacific Heights, Northern Neighbors is a neighborhood group that advocates for more neighbors, more housing, better transit, vibrant business, pedestrian & bike safety. We are long-time residents and newcomers, renters and homeowners, employees and business owners, artists and accountants, high-tech and no-tech, families and individuals, citizens and immigrants, commuters, bus riders, cyclists, pedestrians. We are an affiliated club of YIMBY Action.

Best regards,



Jonathan Buenemann, Northern Neighbors Lead

From: [Jane Natoli](#)
To: [BOS Legislation, \(BOS\)](#)
Cc: [Christopher Nalen](#); [Eduardo Sagues](#)
Subject: Letter regarding File No. 231285 - Appeal of California Environmental Quality Act Determination of Exemption for Environment Review - Proposed 2395 Sacramento Street Project.
Date: Tuesday, January 30, 2024 2:43:17 PM
Attachments: [SF YIMBY LOS.pdf](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

Please see our attached letter regarding the appeal of 2395 Sacramento Street. We continue to support the project and are calling for the Board of Supervisors to reject this CEQA appeal.

Thank you for your attention to this matter!

--

Jane Natoli (she/her)
San Francisco Organizing Director
415-335-9950





SF YIMBY advocates for welcoming communities where everyone can thrive.
sfyimby.org

The Board of Supervisors

City and County of San Francisco

1 Dr. Carlton B. Goodlett Place, City Hall, Room 244,
San Francisco, CA 94102

01/22/2024

RE: Support for 2395 Sacramento Street

Dear Board of Supervisors:

SF YIMBY is pleased to continue to support the proposed project at 2395 Sacramento Street and asks that the Board of Supervisors reject the California Environmental Quality Act ("CEQA") appeal. This project would provide 24 new homes in a high-resource part of San Francisco while adaptively reusing a medical library that has sat empty for some time. This project will also preserve the significant historic features of the building while creating a new use in line with our needs today. It will help address our citywide housing shortage and in particular, our need for more homes in communities like Pacific Heights, which is adjacent to numerous local businesses, jobs, and transportation and has not added much new housing compared to other neighborhoods.

In particular, we are dismayed to see the CEQA utilized in this manner. CEQA is not intended to block dense infill housing like this and yet is too frequently used as a tool

From: info@sfluc.org
To: [BOS Legislation, \(BOS\)](#)
Subject: Support for the Appeal of the Project at 2395 Sacramento Street
Date: Sunday, January 28, 2024 10:21:12 AM
Attachments: [SFLUC's Support of Appeal of 2395 Sacramento Street.pdf](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Please see the attached letter from San Francisco Land Use Coalition in support of the appeal of the project at 2395 Sacramento Street (File No. 231285, Case No. 2022-004172CUA).

Sincerely,

Ozzie Rohm for San Francisco Land Use Coalition



SAN FRANCISCO LAND USE COALITION

January 25, 2024

To: Supervisor Aaron Peskin, Board President
Supervisor Connie Chan
Supervisor Catherine Stefani
Supervisor Joel Engardio
Supervisor Myrna Melgar
Supervisor Dean Preston
Supervisor Matt Dorsey
Supervisor Rafael Mandelman
Supervisor Hillary Ronen
Supervisor Shamann Walton
Supervisor Ahsha Safai

CC: Angela Calvillo, Clerk of the Board
Richard Drury, Lozeau Drury, LLP

Subject: **Support for Appeal of San Francisco Planning Commission’s CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)**

Dear President Peskin and Honorable Members of the Board of Supervisors,

The San Francisco Land Use Coalition supports San Francisco resident, Jonathan Clark’s appeal (“Appellant”) for the proposed CEQA determination for the project located at 2395 Sacramento Street, including all actions related to the redevelopment of a City landmark building (No. 115), the Health Sciences Library, historically known as the Lane Medical Library of Stanford University. We respectfully ask the Board of Supervisors to deny the proposed CEQA exemption and to instead perform adequate environmental review as mandated under CEQA.

We support this appeal for the following reasons:

- With ongoing state housing production laws now coming into effect, it is more important than ever for the City to clarify how it will conduct CEQA evaluations and determinations. As noted on page two of Mr. Clark’s appeal, using the programmatic Housing Element EIR for a specific project concerning a city landmark, one could argue that “CEQA reviews will never be required for any residential project in the City ever again.” CEQA should not be treated as a checklist item open for local editing or streamlining from its important intent, purposes, and requirements. The City needs to withdraw from using the Housing Element EIR as a tool to swat away required CEQA review. This would be a win for our entire city.
- The San Francisco Planning Department (Department) failed to evaluate the building, its full historic significance, and character-defining features in the focused Historic Resource Evaluation (HRE); a full HRE should have been required.

- The Department found that the proposed project meets the Secretary of the Interior's Standards for Rehabilitation, but it clearly does not. The Department failed to assess impacts to any interior spaces in its Secretary's Standards analysis, including impacts to the significant Arthur Mathews murals. These murals should remain in the public realm and a more detailed analysis of how they can be removed safely should be conducted.
- The Department failed to fully evaluate the impacts of the proposed project under CEQA and should have determined that the project required an Environmental Impact Report that would clearly state impacts, put forward feasible project alternatives, and develop meaningful mitigation measures to lessen the identified impacts.

We urge you to uphold this appeal and send the project back to the Planning Department for further environmental evaluation and analysis.

Sincerely,

San Francisco Land Use Coalition

Jerry Dratler – D1, the Richmond District
Sandra Dratler – D1, the Richmond District
Maurice Franco – D2, the Marina
Marlayne Morgan – D2, Cathedral Hill
Bridget Maley – D2, Cow Hollow
Kathleen Courtney – D3, Russian Hill
Chris Bigelow – D3, Russian Hill
Katherine Howard – D4, Outer Sunset
Erica Zweig – D4, Outer Sunset
Ken Rackow – D4, Outer Sunset
Tes Welborn – D5, Haight Ashbury
Bruce Wolfe – D5, Haight Ashbury
George Wooding – D7, Midtown Terrace
Katherin Petrin – D7
Stephanie Peek – D7, Forest Knolls
Bruce Bowen – D8, Dolores Heights
Junona Jonas – D8, Dolores Heights
Gary Weiss – D8, Corbett Heights
Matt McCabe – D8, Noe Valley
Ozzie Rohm – D8, Noe Valley

From: [Robert Cherny](#)
To: [BOS Legislation, \(BOS\)](#)
Subject: Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA
Date: Friday, January 26, 2024 8:56:49 AM
Attachments: [letter to BOS re Lane Library.pdf](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

See attached.

Robert W. Cherny
Professor *emeritus* of History
San Francisco State University



ROBERT W. CHERNY
PROFESSOR EMERITUS OF HISTORY
San Francisco State University
e-mail: robt.cherny@gmail.com

January 23, 2024

San Francisco Board of Supervisors
San Francisco City Hall, Rm. 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

RE: Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)

Dear Supervisors:

I am writing in support of Jonathan Clark's appeal for the proposed CEQA determination for the project located at 2395 Sacramento Street, including actions related to the redevelopment of City Landmark No. 115, the Health Sciences Library, previously the Lane Medical Library of Stanford University.

Please deny the proposed CEQA exemption and to instead require an adequate environmental review as mandated under CEQA.

As some of you know, I have published books and journal articles on the history of our city. I served for five years on the Landmarks Preservation Advisory Committee, the predecessor of the Historic Preservation Commission, including serving as vice-president and acting president. I have been author, co-author, or peer reviewer for National Register and Historic American Building Survey nominations and historic context statements. I am well familiar with Article 10 and CEQA.

I have reviewed the material relevant to the case before you, and I fully agree with those encouraging you to deny the CEQA exemption on the following grounds:

- The Planning Department failed to evaluate fully the building, its full historic significance, and its character-defining features in its focused Historic Resource Evaluation (HRE); *a full HRE should have been required.*
- The Department found that the proposed project meets the Secretary of the Interior's Standards for Rehabilitation, but *it clearly does not* in part because the Department failed to assess any interior spaces in its analysis.
- The Department failed to evaluate fully the impacts of the proposed project under CEQA. *The Department should have determined that the project required an Environmental Impact Report* clearly stating impacts, presenting feasible project alternatives, and developing meaningful mitigation measures to lessen the identified impacts.


I'd like to comment especially regarding Arthur Mathews's *Health and the Arts* murals in the former reading room. Mathews was one of most prominent artists--arguably the most prominent--in California at the time he created those murals in 1912. His other

work includes twelve murals on the history of California in the rotunda of the state capitol.

The proposal is to remove the Mathews murals. Doing so will create an impact on a historic resource that cannot be mitigated to less than a significant level. The proposed separation of the murals from their historic location in the reading room was not fully evaluated in the CEQA evaluation. The project sponsor has provided no indication how the works will be removed from the wall, where and how they will be stored, and when, where, and how they will be restored to public access.

I want to comment specifically on the mural depicting indigenous healing practices. As I understand it, there is nothing in Matthews's own writing that describes his intent for that mural. Thus, we don't know whether he intended to present the shaman as "primitive" (as in the description you have) or as a respectful representation of the practices of the indigenous people of North America, who had a holistic approach to healing that included herbal remedies and invocation of spiritual intervention. My reading of the mural is the latter--that Mathews intended the depiction to be respectful, similar to the way that Bernard Zakheim later depicted indigenous healing practices in his UCSF murals.

Thank you for your consideration,



Robert W. Cherny

From: dianataylor50@gmail.com
To: [BOS Legislation, \(BOS\)](#)
Cc: richard@lozeaudrury.com; [Barbary Coast Neighbors](#)
Subject: FW: SUPPORT for Appeal of CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)
Date: Thursday, January 25, 2024 11:19:13 PM
Attachments: [BCNA 2395 Sacramento BOS Appeal Ltr_01252024.pdf](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Calvillo,

Attached is a letter to all SF Supervisors in **Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016).**

Thank you for relaying this letter on behalf of our neighborhood.

Respectfully,

Diana

Diana Taylor
President, Barbary Coast Neighborhood Association
P.O. Box 2045
San Francisco, CA 94126
(415) 517.6926
Email: dianataylor50@gmail.com
<http://www.bcnasf.org/>



**BARBARY COAST
NEIGHBORHOOD
ASSOCIATION**

BCNA
P.O. Box 2045
San Francisco, CA 94126
BCNA@bcnasf.org
www.bcnasf.org

January 26, 2024

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Via Email

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Supervisor Matt Dorsey
Supervisor Rafael Mandelman
Supervisor Hillary Ronen
Supervisor Shamann Walton
Supervisor Ahsha Safai

Attn: Angela Calvillo, Clerk of the Board via email - bos.legislation@sfgov.org

San Francisco Board of Supervisors
San Francisco City Hall, Rm. 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

RE: Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)

Dear President Peskin, Honorable Members of the Board of Supervisors, and Clerk Calvillo:

On behalf of the Barbary Coast Neighborhood Association (BCNA), I am writing to support San Francisco resident Jonathan Clark's appeal of the proposed CEQA determination for the 2395 Sacramento Street project. This appeal includes all actions related to the redevelopment of a City landmark building (No. 115), the Health Sciences Library, historically known as the Lane Medical Library of Stanford University. BCNA respectfully asks the Board of Supervisors to deny the proposed CEQA exemption and ensure an adequate environmental review is performed instead, as mandated under CEQA.

Founded in 2006, the [Barbary Coast Neighborhood Association](#) (a non-profit California 501c4 corporation) serves the residents and businesses in the [Barbary Coast](#), the historic northeast waterfront along the Embarcadero from Bay Street in the north to Clay Street in the south along the foot of Telegraph Hill and including Jackson Square.

With ongoing state housing production laws now coming into effect, it is more important than ever for the City to clarify how it will conduct CEQA evaluations and determinations. As noted on page two of Mr. Clark's appeal, by using the

programmatic Housing Element EIR for a **specific project** concerning a city landmark one could argue “CEQA reviews will never be required for any residential project in the City ever again.”

CEQA should not be treated as a checklist item open for local editing or streamlining from its important intent, purposes, and requirements. The City needs to back away from using the Housing Element Environmental Impact Report as a tool to avoid performing required CEQA reviews.

In summary, the Department failed to fully evaluate the impacts of the proposed project under CEQA, especially the historical aspects. It should have evaluated the project with a **site specific, not programmatic**, Environmental Impact Report that clearly states impacts, puts forward feasible project alternatives, and develops meaningful mitigation measures to lessen the impacts. Accordingly, I urge you to uphold this appeal and send the project back to the Planning Department for further environmental evaluation and analysis.

Sincerely,

Diana Taylor

Diana Taylor
President, BCNA
415.517.6926

cc: Richard Drury, Lozeau Drury, LLP – richard@lozeaudrury.com – appellant’s counsel

From: info@sfluc.org
To: [Peskin, Aaron \(BOS\)](#); [Preston, Dean \(BOS\)](#); [Melgar, Myrna \(BOS\)](#); [Dorsey, Matt \(BOS\)](#); [Ronen, Hillary; Mandelman, Rafael \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [EngardioStaff \(BOS\)](#); [Chan, Connie \(BOS\)](#); [Walton, Shamann \(BOS\)](#); [Safai, Ahsha \(BOS\)](#)
Cc: [Board of Supervisors \(BOS\)](#); [Richard Drury](#)
Subject: Support for the Appeal of the Project at 2395 Sacramento Street
Date: Thursday, January 25, 2024 5:05:10 PM
Attachments: [SFLUC's Support of Appeal of 2395 Sacramento Street.pdf](#)

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Dear President Peskin and Honorable Members of the Board,

Please see the attached letter from San Francisco Land Use Coalition in support of the appeal of the project at 2395 Sacramento Street (File No. 231285, Case No. 2022-004172CUA).

Sincerely,

Ozzie Rohm for San Francisco Land Use Coalition



SAN FRANCISCO LAND USE COALITION

January 25, 2024

To: Supervisor Aaron Peskin, Board President
Supervisor Connie Chan
Supervisor Catherine Stefani
Supervisor Joel Engardio
Supervisor Myrna Melgar
Supervisor Dean Preston
Supervisor Matt Dorsey
Supervisor Rafael Mandelman
Supervisor Hillary Ronen
Supervisor Shamann Walton
Supervisor Ahsha Safai

CC: Angela Calvillo, Clerk of the Board
Richard Drury, Lozeau Drury, LLP

Subject: **Support for Appeal of San Francisco Planning Commission’s CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)**

Dear President Peskin and Honorable Members of the Board of Supervisors,

The San Francisco Land Use Coalition supports San Francisco resident, Jonathan Clark’s appeal (“Appellant”) for the proposed CEQA determination for the project located at 2395 Sacramento Street, including all actions related to the redevelopment of a City landmark building (No. 115), the Health Sciences Library, historically known as the Lane Medical Library of Stanford University. We respectfully ask the Board of Supervisors to deny the proposed CEQA exemption and to instead perform adequate environmental review as mandated under CEQA.

We support this appeal for the following reasons:

- With ongoing state housing production laws now coming into effect, it is more important than ever for the City to clarify how it will conduct CEQA evaluations and determinations. As noted on page two of Mr. Clark’s appeal, using the programmatic Housing Element EIR for a specific project concerning a city landmark, one could argue that “CEQA reviews will never be required for any residential project in the City ever again.” CEQA should not be treated as a checklist item open for local editing or streamlining from its important intent, purposes, and requirements. The City needs to withdraw from using the Housing Element EIR as a tool to swat away required CEQA review. This would be a win for our entire city.
- The San Francisco Planning Department (Department) failed to evaluate the building, its full historic significance, and character-defining features in the focused Historic Resource Evaluation (HRE); a full HRE should have been required.

From: [Katherine Petrin](#)
To: [BOS Legislation, \(BOS\)](#)
Cc: [ChanStaff \(BOS\)](#); [DorseyStaff \(BOS\)](#); [EngardioStaff \(BOS\)](#); [MandelmanStaff \(BOS\)](#); [MelgarStaff \(BOS\)](#); [Peskin, Aaron \(BOS\)](#); [Preston, Dean \(BOS\)](#); [Ronen, Hillary \(BOS\)](#); [Safai, Ahsha \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Walton, Shamann \(BOS\)](#); [Board of Supervisors \(BOS\)](#); richard@lozeaudrury.com
Subject: 2395 Sacramento Street - Support for Appeal of CEQA Action
Date: Thursday, January 25, 2024 4:47:11 PM

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25 January 2024

San Francisco Board of Supervisors
San Francisco City Hall, Rm. 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Attn: Angela Calvillo, Clerk of the Board

RE: Support for Appeal of Planning Commission's CEQA Action
2395 Sacramento Street, APN 0637/015 & 016
File No. 231285, Case No. 2022-004172CUA

Dear President Peskin, Honorable Members of the Board of Supervisors, and Clerk Calvillo,

I support the appeal regarding the CEQA determination for the project at 2395 Sacramento Street.

There are many compelling reasons to uphold this appeal. My letter addresses only the most egregious. The Planning Department's assumption that projects that fall under the Housing Element should be exempt from review under the California Environmental Quality Act (CEQA) is an extremely flawed premise.

The City cannot use the Housing Element Environmental Impact Report (EIR), a programmatic level EIR, as a tool to bypass required CEQA review for individual properties, in this case a designated landmark building. This is a neglect of Planning Department responsibilities.

The Planning Department failed to evaluate the impacts of the proposed project under CEQA. It should have determined that an Environmental Impact Report (EIR) is necessary, outlining potential impacts, proposing feasible alternatives, and developing meaningful mitigation measures to address identified impacts to the cultural asset.

Please support this appeal and return the project to the Planning Department for the appropriate level of environmental evaluation.

Sincerely,
Katherine Petrin

Katherine Petrin Consulting
Architectural History and Preservation Planning
Maybeck Building
1736 Stockton Street, Suite 2A
San Francisco, California 94133

cc: Richard Drury, Lozeau Drury, LLP

From: [Christopher VerPlanck](#)
To: [BOS Legislation, \(BOS\)](#)
Subject: Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA
Date: Thursday, January 25, 2024 1:10:52 PM
Attachments: [2395 Sacramento Letter VerPlanck 01.25.2024.pdf](#)

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Dear Angela,

Please find attached my letter to the Board of Supervisors in regard to the Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA.

Thank you.

--

Christopher VerPlanck, Principal
VerPlanck Historic Preservation Consulting
530 Rockdale Drive
San Francisco, California 94127

c.415.606.0920

chris@verplanckconsulting.com



Virus-free. www.avast.com

Via Email

January 25, 2024

Christopher VerPlanck
530 Rockdale Drive
San Francisco, CA 94127

Supervisor Aaron Peskin, Board President
Supervisor Connie Chan
Supervisor Catherine Stefani
Supervisor Joel Engardio
Supervisor Myrna Melgar
Supervisor Dean Preston
Supervisor Matt Dorsey
Supervisor Rafael Mandelman
Supervisor Hillary Ronen
Supervisor Shamann Walton
Supervisor Ahsha Safai

Attn: Angela Calvillo, Clerk of the Board via email - bos.legislation@sfgov.org

San Francisco Board of Supervisors
San Francisco City Hall, Rm. 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

RE: Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)

Dear President Peskin, Honorable Members of the Board of Supervisors, and Clerk Calvillo:

I am writing to support San Francisco resident Jonathan Clark's ("Appellant") appeal for the proposed CEQA determination for the project located at 2395 Sacramento Street, including all actions related to the redevelopment of a city landmark building (No. 115) – the Health Sciences Library – historically known as the Lane Medical Library of Stanford University. I respectfully ask the Board of Supervisors to deny the proposed CEQA exemption and to instead require the Planning Department to perform adequate environmental review as mandated under CEQA.

My name is Christopher VerPlanck. I am an independent architectural historian and historic preservation consultant. I have been working in San Francisco for 26 years, and I have a great deal of experience in the areas of cultural resource identification and project impact assessment, as well as analyzing projects for compliance with the Secretary of the Interior's Standards (Standards). I have also prepared close to a dozen successful city landmark and historic district applications.

I support this appeal for the following reasons:

- With ongoing state housing production laws now coming into effect, it is more important than ever for the City to clarify how it will conduct CEQA evaluations and determinations. As noted on page two of Mr. Clark's appeal, using the *programmatic* Housing Element EIR for a *specific*

project concerning a city landmark one could result in CEQA reviews never being required for any residential project in the city ever again. CEQA should not be treated as a checklist item open for local interpretation or “streamlining,” which diminishes its original intent, purposes, and requirements. The City needs to stop using the Housing Element EIR as a tool to stop required CEQA review. This is my primary concern about this project.

- The San Francisco Planning Department failed miserably to assess both the building’s historical significance and the project’s impacts, requiring only a focused Historic Resource Evaluation (HRE) for a major project affecting a city landmark. At the very least a full HRE should have been required, including a full architectural description, historic context, and a delineation of all character-defining features.
- Planning Department staff found that the proposed project meets *the Secretary of the Interior’s Standards for Rehabilitation*, but it clearly does not. The Planning Department failed to assess impacts to ANY interior spaces or features in its analysis using the Standards, including potential impacts to the culturally significant Arthur Mathews murals. These murals should ideally remain in the public realm, and not be placed in storage in a city-owned warehouse where they will invariably be destroyed or lost. In addition, a more detailed analysis should be undertaken of how they can be removed safely, as well as the identification of potential new (public) locations.
- Planning Department staff failed to fully evaluate the impacts of the proposed project under CEQA. At the very least this project requires a focused Environmental Impact Report (EIR) that would clearly state the project’s impacts, put forward feasible project alternatives, and develop meaningful mitigation measures to lessen the identified impacts.

I urge you to uphold this appeal and send the project back to the Planning Department for further environmental evaluation and analysis.

Sincerely,



cc: Richard Drury, Lozeau Drury, LLP – richard@lozeaudrury.com

From: [Barbara Heffernan](#)
To: [BOS Legislation, \(BOS\)](#); [ChanStaff \(BOS\)](#); [Catherine.Stefani@sfgov.org](#); [Peskin, Aaron \(BOS\)](#); [EngardioStaff \(BOS\)](#); [Prestonstaff@sfgov.org](#); [DorseyStaff \(BOS\)](#); [MelgarStaff \(BOS\)](#); [MandelmanStaff \(BOS\)](#); [Ronenstaff@sfgov.org](#); [Waltonstaff@sfgov.org](#); [Safai, Ahsha \(BOS\)](#)
Cc: richard@lozeaudrury.com
Subject: 2395 Sacramento Appeal
Date: Thursday, January 25, 2024 12:29:48 PM

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January 25th, 2024

Supervisor Aaron Peskin, Board President
Supervisor Connie Chan
Supervisor Catherine Stefani
Supervisor Joel Engardio
Supervisor Myrna Melgar
Supervisor Dean Preston
Supervisor Matt Dorsey
Supervisor Rafael Mandelman
Supervisor Hillary Ronen
Supervisor Shamann Walton
Supervisor Ahsha Safai

Attn: Angela Calvillo, Clerk of the Board via email - bos.legislation@sfgov.org

San Francisco Board of Supervisors
San Francisco City Hall, Rm. 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

RE: Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)

Dear President Peskin, Honorable Members of the Board of Supervisors, and Clerk Calvillo:

I am writing to support San Francisco resident Jonathan Clark's appeal ("Appellant") for the proposed CEQA determination for the project located at 2395 Sacramento Street, including all actions related to the redevelopment of a city landmark building (No. 115), the Health Sciences Library, historically known as the Lane Medical Library of Stanford University. I respectfully ask the Board of Supervisors to deny the proposed CEQA exemption and to instead perform adequate environmental review as mandated under CEQA.

I am a resident and homeowner in San Francisco and protecting landmark buildings and homes is very important. It contributes to the character of our city. I am on the Board of the Cow Hollow Association and a member of the Pacific Heights Residents Association (PHRA).

I support this appeal for the following reasons:

- With ongoing state housing production laws now coming into effect, it is more important than ever for the City to clarify how it will conduct CEQA evaluations and determinations. As noted on page two of Mr. Clark's appeal, using

the *programmatic* Housing Element EIR for a *specific project* concerning a city landmark one could argue “CEQA reviews will never be required for any residential project in the City ever again.” CEQA should not be treated as a checklist item open for local editing or streamlining from its important intent, purposes, and requirements. The City needs to withdraw from using the Housing Element Environmental Impact Report as a tool to swat away required CEQA review.

- The San Francisco Planning Department failed to evaluate the building, its full historic significance, character-defining features in the focused Historic Resource Evaluation (HRE); a full HRE should have been required to discuss the full history, and all character-defining features.
- The Department found that the proposed project meets *the Secretary of the Interior’s Standards for Rehabilitation*, but it clearly does not. The Department failed to assess impacts to ANY interior spaces or features in its *Secretary’s Standards* analysis, including impacts to the significant Arthur Mathews murals. These murals should remain in the public realm and a more detailed analysis of how they can be removed safely should be conducted.
- The Department failed to fully evaluate the impacts of the proposed project under CEQA and should have determined that the project required a site specific, not programmatic, Environmental Impact Report that would clearly state impacts, put forward feasible project alternatives, and develop meaningful mitigation measures to lessen the identified impacts.

I am urging you to uphold this appeal and send the project back to the Planning Department for further environmental evaluation and analysis.

Sincerely,
Barbara Heffernan
San Francisco resident

cc: Richard Drury, Lozeau Drury, LLP – richard@lozeaudrury.com – appellant’s counsel

From: [Shayne Watson](#)
To: [BOS Legislation \(BOS\)](#); [ChanStaff \(BOS\)](#); [DorseyStaff \(BOS\)](#); [EngardioStaff \(BOS\)](#); [MandelmanStaff \(BOS\)](#); [MelgarStaff \(BOS\)](#); [Peskin, Aaron \(BOS\)](#); [Preston, Dean \(BOS\)](#); [Ronen, Hillary](#); [Safai, Ahsha \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Walton, Shamann \(BOS\)](#); [Board of Supervisors \(BOS\)](#)
Cc: richard@lozeaudrury.com
Subject: Support for Appeal of CEQA Action re. 2395 Sacramento Street
Date: Thursday, January 25, 2024 10:13:54 AM

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January 25, 2024

San Francisco Board of Supervisors
San Francisco City Hall, Rm. 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Attn: Angela Calvillo, Clerk of the Board (via email)

RE: Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)

Dear President Peskin, Honorable Members of the Board of Supervisors, and Clerk Calvillo,

I'm an architectural historian and a member of the Board of Trustees at the California Preservation Foundation. I write to express my support for the appeal made by San Francisco resident Jonathan Clark regarding the CEQA determination for the project at 2395 Sacramento Street.

In my two decades of experience evaluating historic properties in San Francisco, I have observed a concerning pattern within the San Francisco Planning Department. It appears that the department is neglecting its responsibilities under the California Environmental Quality Act (CEQA), putting our cultural assets at risk of irreversible damage. A similar situation occurred with the Castro Theatre, where the Planning Department failed to thoroughly assess the negative impacts of proposed demolition of interior character-defining features associated with the property's LGBTQ significance.

I stand behind Mr. Clark's appeal for several reasons:

- 1. Need for Clarification on CEQA Review:**

With the implementation of ongoing state housing production laws, it is crucial for the City to clarify its approach to CEQA evaluations. Mr. Clark rightly points out in his appeal that the use of the programmatic Housing Element EIR for specific projects could potentially eliminate the need for CEQA reviews. I believe CEQA should not be treated as a checklist item subject to local editing. The City must refrain from using the Housing Element EIR as a tool to bypass required CEQA review for individual properties.

2.

Need for a Comprehensive Historic Resource Evaluation (HRE):

The Planning Department failed to conduct a comprehensive Historic Resource Evaluation (HRE) for the project at 2395 Sacramento Street. A full HRE should have been mandatory to thoroughly discuss the property's complete history and all character-defining features.

3.

Project's Failure to Meet Secretary of the Interior's Standards for Rehabilitation:

The Department's analysis claimed that the proposed project meets the Secretary of the Interior's Standards for Rehabilitation, but it is evident that this is not the case. There was a lack of assessment of impacts to any interior spaces or features, including the significant Arthur Mathews murals. These murals, with their identified historical significance, should remain in the public realm, and a more detailed analysis on their safe removal is imperative. (This echoes what happened at the Castro Theatre, where the Planning Department exempted an objective and thorough CEQA study of the APE project's negative impacts on interior character-defining features.)

4.

Need for Further Analysis Under CEQA:

The Planning Department failed to fully evaluate the impacts of the proposed project under CEQA. It should have determined that an Environmental Impact Report (EIR) is necessary, outlining potential impacts, proposing feasible alternatives, and developing meaningful mitigation measures to address identified impacts to the cultural asset. (This should have happened at the Castro Theatre as well.)

I respectfully urge you to uphold this appeal and send the project back to the Planning Department for the type of environmental evaluation and analysis intended to protect our city's most valuable cultural assets.

Please don't allow the Castro Theatre and 2395 Sacramento Street to set precedent for how we treat the places that make our beloved San Francisco so unique.

Sincerely,

Shayne Watson

Architectural Historian

Watson Heritage Consulting

California Preservation Foundation, Board of Trustees

Castro LGBTQ Cultural District, Advisory Board

cc: Richard Drury, Lozeau Drury, LLP

From: [Board of Supervisors \(BOS\)](#)
To: [BOS-Supervisors](#); [BOS-Legislative Aides](#)
Cc: [BOS Legislation \(BOS\)](#); [BOS-Operations](#); [Calvillo, Angela \(BOS\)](#); [De Asis, Edward \(BOS\)](#); [Entezari, Mehran \(BOS\)](#); [Mchugh, Eileen \(BOS\)](#); [Ng, Wilson \(BOS\)](#); [Somera, Alisa \(BOS\)](#)
Subject: FW: Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)
Date: Wednesday, January 24, 2024 8:15:50 AM
Attachments: [CEQA Fact Sheet-4.pdf](#)

Hello,

Please see the attached and below communication regarding **File No. 231285:**

Hearing of persons interested in or objecting to the determination of exemption from environmental review under the California Environmental Quality Act issued as a General Plan Evaluation by the Planning Department on October 23, 2023, for the proposed project at 2395 Sacramento Street.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisor
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:** Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

From: Kathy Howard <kathyhoward@earthlink.net>
Sent: Tuesday, January 23, 2024 6:11 PM
To: Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; ChanStaff (BOS) <chanstaff@sfgov.org>; MandelmanStaff (BOS) <mandelmanstaff@sfgov.org>; MelgarStaff (BOS) <melgarstaff@sfgov.org>; Preston, Dean (BOS) <dean.preston@sfgov.org>; Safai, Ahsha (BOS) <ahsha.safai@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>; DorseyStaff (BOS)

<DorseyStaff@sfgov.org>; info@engardio.com; Peskin, Aaron (BOS) <aaron.peskin@sfgov.org>; Ronen, Hillary <hillary.ronen@sfgov.org>; Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>
Subject: Support for Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, File No. 231285, Case No. 2022-004172CUA (Block/Lot: 0637/015 & 016)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors,

Please support San Francisco resident Jonathan Clark's appeal ("Appellant") for the proposed CEQA determination for the project located at 2395 Sacramento Street, including all actions related to the redevelopment of a City landmark building (No. 115), the Health Sciences Library, historically known as the Lane Medical Library of Stanford University. Please deny the proposed CEQA exemption and instead perform adequate environmental review as mandated under CEQA.

I have seen many projects in which someone (usually a developer or a well-funded special interest group) claimed that CEQA was unnecessary or redundant, a waste of time and money. This is a tired refrain, but unfortunately this cavalier attitude towards the environment is one of the reasons the natural world is so severely degraded. It is vital that we all support CEQA and thorough CEQA reviews if we are going to have any environmental protections, much less any buildings of note left in San Francisco.

As outlined in the appeal, CEQA review is required to analyze environmental impacts that are peculiar to the Project. Historic resource Impacts, vibration impacts, diesel particulate matter health risks, wind impacts, biological impacts, shadow impacts, and pedestrian safety impacts are all peculiar to this Project. Why are the Project sponsors fighting a complete CEQA review? Are they worried that some of these impacts will be discovered following a more adequate environmental review? If that is so, then we should all be concerned about the potential impacts of this Project and insist that more review be undertaken to study them and to propose mitigations to them.

In its [CEQA Fact Sheet](#) (attached) the Sierra Club states that CEQA -

“Helps California protect public health and reach its ambitious environmental goals. The CEQA process has been used to help cut climate pollution, reduce air and water pollution and protect open space, wildlife habitats and farmlands.”

And, furthermore, CEQA -

“Supports California's economic growth. Studies have documented that since its

enactment in 1970, CEQA has not prevented California from building and thriving.”

San Francisco needs thorough CEQA reviews. Please uphold this appeal and send the Project back to the Planning Department for further environmental evaluation and analysis. Thank you for your consideration.

Katherine Howard
District 4



The California Environmental Quality Act

Protects our environment. Keeps Californians healthy. Promotes transparency.



The California Environmental Quality Act (CEQA), passed in 1970 and signed into law by then-Governor Ronald Reagan, is one of the foundational environmental laws in California.

CEQA requires that the environmental impacts of significant projects—from skyscrapers to freeways to sports stadiums—have been publicly disclosed, analyzed and, where feasible, mitigated.

It facilitates compliance with other environmental laws and regulations, and makes sure that responsible parties clean up their pollution.

CEQA BENEFITS

CEQA has a range of benefits for all Californians. It:

- **Sets up an orderly, manageable track that project proponents and residents can follow as projects are developed.** It helps remove surprise and unpredictability from the construction permitting process.
- **Helps California protect public health and reach its ambitious environmental goals.** The CEQA process has been used to help cut climate pollution, reduce air and water pollution and protect open space, wildlife habitats and farmlands.
- **Ensures that environmental justice and equity are part of the development decision-making process.**



- **It's about transparency.** CEQA gives all Californians the opportunity to know what is planned in their communities and then weigh in to help reduce health and environmental impacts.
- **Holds government agencies and developers accountable.** CEQA ensures that public agencies and private proponents comply with air and water standards.
- **Minimizes court challenges to projects.** CEQA allows concerns to be addressed early in the development process. As a result, numerous studies have routinely shown that CEQA litigation occurs for only about 1% of all projects that must comply with the law.
- **Supports California's economic growth.** Studies have documented that since its enactment in 1970, CEQA has not prevented California from building and thriving.
- **Reflects a changing California.** CEQA is a living document and has been amended continuously since its enactment to make the review process function efficiently.

CEQA is working to protect California's environment and communities.

Sierra Club California

909 12th Street, Suite 202, Sacramento, CA 95814

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