

From: [Stan Hayes](#)
To: [Peskin, Aaron \(BOS\)](#); [Chan, Connie \(BOS\)](#); [Dorsey, Matt \(BOS\)](#); [Engardio, Joel \(BOS\)](#); [Mandelman, Rafael \(BOS\)](#); [Melgar, Myrna \(BOS\)](#); [Preston, Dean \(BOS\)](#); [Ronen, Hillary \(BOS\)](#); [Safai, Ahsha \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Walton, Shamann \(BOS\)](#); [Board of Supervisors \(BOS\)](#)
Cc: [Gibson, Lisa \(CPC\)](#); [Richard Drury](#)
Subject: SUPPORT for Appeal of Determination of Exemption From Environmental Review – Proposed Project 2395 Sacramento Street Project (File 231285)
Date: Monday, February 5, 2024 9:07:59 AM
Attachments: [THD Com Ltr BOS 2395 Sacto Appeal FINAL 2-4-24.pdf](#)

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

Dear President Peskin and Members of the Board of Supervisors,

On behalf of the Telegraph Hill Dwellers, please accept the attached letter in SUPPORT of the above-cited appeal of a determination of exemption from environmental review under the California Environmental Quality Act (CEQA) issued as a General Plan Evaluation by the Planning Department for a project at 2395 Sacramento Street.

We are concerned that this determination, if upheld, could set a sweeping precedent that would invite similar exemptions of many future such projects.

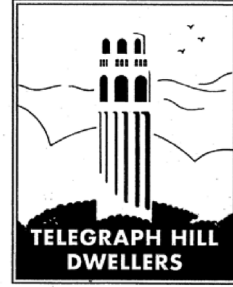
Sincerely,

Stan Hayes

President
Telegraph Hill Dwellers

February 4, 2024

President Aaron Peskin and
San Francisco Board of Supervisors
Attn: Angela Cavillo, Clerk of the Board
San Francisco City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
Via Email: Board.of.Supervisors@sfgov.org



RE: SUPPORT for Appeal of Determination of Exemption From Environmental Review – Proposed Project 2395 Sacramento Street Project (File 231285)

Dear President Peskin and Members of the Board of Supervisors,

On behalf of the Telegraph Hill Dwellers, we are writing to SUPPORT the above-cited appeal of a determination of exemption from environmental review under the California Environmental Quality Act (CEQA) issued as a General Plan Evaluation by the Planning Department for a project at 2395 Sacramento Street. We are concerned that this determination, if upheld, could set a sweeping precedent that would invite similar exemptions of many future such projects.

Project developers are seeking to construct 24 dwelling units by converting Article 10 Landmark No. 115 at 2395 Sacramento Street, historically known as the Lane Medical Library, and by developing an adjacent vacant lot fronting Webster Street. The project would include a seven-story over basement addition at the building's east elevation and a six-story addition to the south of the building. Of the 24 dwelling units, the project would provide 3 low-income units, utilizing the Individually Requested State Density Bonus Program to waive the property's 40-foot height limit, reduce rear yard requirements, and reduce dwelling unit exposure requirements.

Under CEQA Guidelines Section 15183 (Projects Consistent with a Community Plan, General Plan, or Zoning), the Planning Department has determined that the project is exempt from additional environmental review on the grounds that it is consistent with the certified Housing Element Environmental Impact Report (EIR). According to Section 15183(b), however, such exemption cannot be made when an initial study or other analysis shows environmental effects that:

- (1) *“Are peculiar to the project or the parcel on which the project would be located,*
- (2) *Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent,*
- (3) *Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or*
- (4) *Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.”*

Individual projects, such as the one at 2395 Sacramento Street, frequently have unique, project-specific environmental effects, which must be addressed by project-level environmental review. The Housing Element EIR is a programmatic EIR. As such, it does not, nor is it intended to, resolve individual project-specific environmental effects, such as those to designated local landmark properties or National Register-eligible resources.

Analyses must be done to identify and evaluate the significance of such project-specific environmental impacts. The likelihood, if not near certainty, of unique such impacts in individual projects argues strongly against any sweeping blanket reliance on the Housing Element EIR to justify exemptions of project-level environmental review.

Without repeating the arguments here, by reference, we concur with the more detailed appeal and materials filed by Richard T. Drury, Esq., of Lozeau Drury LLP, on behalf of appellant Jonathan Clark.

Please grant the above-cited appeal for 2395 Sacramento Street and refer the project back to the Planning Department for preparation of a proper CEQA document to analyze and mitigate the project's environmental impact.

Thank you very much for your consideration.

Sincerely,

Stan Hayes

President
Telegraph Hill Dwellers

cc: President Aaron Peskin Aaron.Peskin@sfgov.org
Connie Chan Connie.chan@sfgov.org
Matt Dorsey matt.dorsey@sfgov.org
Joel Engardio joel.engardio@sfgov.org
Rafael Mandelman rafael.mandelman@sfgov.org
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Asha Safai Ahsha.Safai@sfgov.org
Catherine Stefani Catherine.Stefani@sfgov.org
Shaman Walton Shamann.Walton@sfgov.org
Lisa Gibson, Environmental Review Officer lisa.gibson@sfgov.org
Richard Drury richard@lozeaudrury.com

From: [Courtney Damkroger](#)
To: [BOS Legislation, \(BOS\)](#)
Cc: [Woody LaBounty](#)
Subject: Item 21 (231285), 2395 Sacramento Street, 2/6/24 BOS hearing.
Date: Tuesday, February 6, 2024 9:08:11 AM
Attachments: [image001.png](#)
[2024 2 6 2395 Sac appeal.docx](#)

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Please see the attached letter regarding Item 21 (231285), 2395 Sacramento Street, at today's BOS hearing.

Thank you,
Courtney Damkroger

5 February 2024

San Francisco Board of Supervisors
San Francisco City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
Attn: Angela Calvillo, Clerk of the Board
Email: bos.legislation@sfgov.org

RE: Support for - Appeal of Determination of Exemption from Environmental Review - Proposed
2395 Sacramento Street Project

Dear President Peskin and Members of the Board of Supervisors:

I write in favor of the appeal of the Planning Department's determination that the project proposed at 2395 Sacramento Street is exempt from environmental review under the California Environmental Quality Act issued as a General Plan Evaluation.

The individually designated Health Sciences Library (formerly Lane Medical Library) is significant for both its Beaux Arts architecture and association with medical history in San Francisco. In reviewing any proposed project involving a designated landmark, it is the Planning Department's responsibility to identify the all of character defining features and to ensure a thorough evaluation of the proposed project's impact on the landmark in order to ascertain whether the proposed project meets the *Secretary of the Interior's Standards*. Given the loss of interior character defining features as a result of the proposed project, the project does not appear to comply with the *Standards*.

I support the appeal because reliance on the Housing Element EIR and General Plan Evaluation for CEQA clearance does not afford historic resources like the Health Sciences Library the necessary evaluation intended under CEQA. Historic and cultural resources around the city, and worldwide, are routinely and successfully adapted to new uses when their character defining features are respected and retained. Approving the use of these exemptions for this project will enable similar application citywide at a time when our historic and culture resources are at significant risk.

I urge you to support the appeal.

Thank you for the opportunity to comment.

Sincerely,
Courtney Damkroger

From: [Steve Pickrell](#)
To: [BOS Legislation, \(BOS\)](#)
Cc: catherine.stefanie@sfgov.org; [StefaniStaff \(BOS\)](#); [Greg Scott](#); carlah@phra-sf.org
Subject: RE: Appeal of Planning Commission CEQA Action for 2395 Sacramento Street
Date: Monday, February 5, 2024 2:45:02 PM
Attachments: [PHRA 2395 Sacramento Appeal.pdf](#)

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Pacific Heights Residents Association
2443 Fillmore Street #178
San Francisco, California 94115-1814

President Aaron Peskin
and San Francisco Board of Supervisors
Attn: Angela Calvillo, Clerk of the Board
City Hall, Room 244
Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
Email: bos.legislation@sfgov.org

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

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

The Pacific Heights Residents Association is writing in support of the appellant in the above case, the redevelopment of Lane Medical Library/Webster Hall at 2395 Sacramento Street. We understand that the Board of Supervisors is being asked to hear an appeal of the Planning Commission's recent Determination of Exemption from Environmental Review of the proposed residential redevelopment project at 2395 Sacramento Street. As we expressed in our November 3, 2023 letter to the Planning Commission, we are not opposed to the redevelopment of this site for residential use. We do however believe that the project, as approved thus far, does irreparable harm to an important historic asset in San Francisco, and creates a poor juxtaposition of height, bulk and mass to the numerous historic buildings in the immediate area.

PHRA supports adding housing units in this neighborhood, and has supported other residential redevelopment projects in the recent past. We also support historical preservation of meaningful assets, and we do not believe this project goes far enough to do just that. The shortage of affordable housing in the City, while an undeniable problem, should not cause the Historical Preservation Commission, the Planning Commission, or the City's Environmental Review Officer to reduce protection of these assets. Nor should the City fail to carry out the intent of state environmental protection laws under pressure from a vocal pro-housing lobby. We ask that the Board of Supervisors grant the appeal and require the Planning Department to conduct an appropriate CEQA analysis of the project in hopes it will compel the project owner to produce a design that respects and preserves these irreplaceable assets while providing much needed new housing on the site.

Respectfully,

L. Greg Scott
Steve Pickrell
Pacific Heights Residents Association

Cc: Supervisor Catherine Stefani

Attached as PDF

Pacific Heights Residents Association

2443 Fillmore Street #178

San Francisco, California 94115-1814

www.phra-sf.org

info@phra-sf.org

President Aaron Peskin
and San Francisco Board of Supervisors
Attn: Angela Calvillo, Clerk of the Board
City Hall, Room 244
Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
Email: bos.legislation@sfgov.org

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

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PHRA supports adding housing units in this neighborhood, and has supported other residential redevelopment projects in the recent past. We also support historical preservation of meaningful assets, and we do not believe this project goes far enough to do just that. The shortage of affordable housing in the City, while an undeniable problem, should not cause the Historical Preservation Commission, the Planning Commission, or the City's Environmental Review Officer to reduce protection of these assets. Nor should the City fail to carry out the intent of state environmental protection laws under pressure from a vocal pro-housing lobby. We ask that the Board of Supervisors grant the appeal and require the Planning Department to conduct an appropriate CEQA analysis of the project in hopes it will compel the project owner to produce a design that respects and preserves these irreplaceable assets while providing much needed new housing on the site.

Respectfully,

L. Greg Scott
Steve Pickrell
Pacific Heights Residents Association

Cc: Supervisor Catherine Stefani

From: [zrants](#)
To: [BOS Legislation \(BOS\)](#); [ChanStaff \(BOS\)](#); [DorseyStaff \(BOS\)](#); [EngardioStaff \(BOS\)](#); [MandelmanStaff \(BOS\)](#); [MelgarStaff \(BOS\)](#); [Peskin, Aaron \(BOS\)](#); [Preston, Dean \(BOS\)](#); [Ronen, Hillary \(BOS\)](#); [Safai, Ahsha \(BOS\)](#); [StefaniStaff \(BOS\)](#)
Cc: [Richard Drury](#)
Subject: Support for Appeal of CEQA Action re. 2395 Sacramento Street
Date: Friday, February 2, 2024 1:53:21 PM

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February 2, 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 concerned San Francisco citizen, President of East Mission Improvement Association (EMIA) and Coalition for Coalition Neighborhoods (CSFN) Land Use and Transportation Chair. Most of the neighborhood groups untied around a shared love of the city and its unqued qualities that we feel should be protected for future generations. Protecting landmark buildings is very important. It contributes to the

character of our city and keeps us grounded as we make our way through the trends brought on by economic tests that have unraveled the social fabric of our lives.

I support this appeal as a backstop against wanton demolition of our landmark buildings. 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. 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.”

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,
Mari Eliza, Concerned San Francisco Citizen

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