



TEAMSTERS LOCAL UNION No. 665

AFFILIATED WITH THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS
& TEAMSTERS JOINT COUNCIL No. 7

July 20, 2026

Tony Delorio
Principal Officer
Secretary-Treasurer

Michael Yates
President
Business Agent

Florencio Sinogui
Vice President
Business Agent

Juan Gallo
Recording Secretary
Business Agent

Robin Terrell
Trustee

Harold Johnson
Trustee

Arthur Hilmoe
Trustee

Joe Matekel
Business Agent

Mark Malouf
Business Agent

Tom Woods
Business Agent

Ron Kelly
Business Agent

Isela Jacques-Ramirez
Office Manager
Bookkeeper

Carla Wong
Titan Operator

David Svoboda
Titan Operator

Peggy Condori
Member Services

Board of Supervisors

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

RE: Board File No. 260657 — Appeal of CEQA Exemption Determination, 1200 Larkin Street (Planning Record No. 2025-011750PRJ)-Matter Tabled by Operation of Law

Members of the Board of Supervisors:

We write concerning our appeal for the above-referenced project. Our appeal under the California Environmental Quality Act (CEQA) has been tabled by operation of law following the project sponsor's July 8, 2026 withdrawal of its project application to establish a Fleet Charging use for autonomous vehicles (AV) at 1200 Larkin and the Planning Department's subsequent rescission of the Planning Approval Letter. While we do not object to the tabling, we write because the two problems our appeal exposed remain unresolved and will recur with the next application. We respectfully ask the Board to:

1. **Close the historic-building loophole legislatively.** Planning Code Section 202.11(d)(3) makes any conditionally permitted use principally permitted in a Historic Building. That provision was designed to encourage adaptive reuse of the City's historic garages and auto-row buildings for housing and neighborhood-serving uses and not to let a 74-stall AV fleet charging facility bypass the Conditional Use (CU) requirement this Board recently enacted city-wide for Fleet Charging. At 1200 Larkin, a use the Board deemed serious enough to require CU review everywhere else in the City, was approved administratively and with no hearing. Only the sponsor's voluntary withdrawal — not any public process — ended the project. We urge the Board to amend Section 202.11 to exclude Fleet Charging from its automatic principally permitted uses in historic buildings just as it currently does for Cannabis Retail, Hotel and Industrial Uses.
2. **Fix the City's analysis of AV traffic under CEQA.** At 1200 Larkin, the Department's own consultant quantified up to 3.35 million annual net new vehicle miles traveled under an AV scenario — including empty-vehicle "deadheading" and mode shift away from transit — and acknowledged that no prescribed methodology exists to analysis impacts of this use under CEQA. The CEQA exemption determination for the project then disposed of transportation impacts in a single sentence about queuing and never mentioned those findings. That is not adequate environmental review. Recent events confirm these impacts are real, not speculative: the December 20, 2025 power outage left roughly 1,600 stalled AV incidents blocking intersections, Muni, and fire apparatus; on July 4, 2026, dozens of AVs gridlocked the Presidio and Marina for hours, with some towed after their batteries died; and just a few days ago another outage forced a citywide AV service suspension. We ask the Board to direct Planning to develop and adopt a transportation analysis methodology under CEQA for AV fleet charging facilities — addressing induced VMT, deadheading, transit

[Main Office](#)



diversion, and emergency operations — before relying on any future categorical exemption for such a project.

The withdrawal at 1200 Larkin Street resolved one project; it did not resolve the policy gap or the analytical gap that still exists. We stand ready to work with the Board and the Planning Department on both.

Respectfully submitted,

Tony Delorio

Tony Delorio
Principal Officer
Teamsters Local Union 665