



TEAMSTERS LOCAL UNION No. 665

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

May 28, 2026

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Ms. Angela Calvillo, Clerk of the Board of Supervisors
City and County of San Francisco City Hall,
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102

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BOARD OF SUPERVISORS
SAN FRANCISCO
2026 MAY 29 PM 12:35

**RE: Appeal of CEQA Class 32 Exemption Determination — 1200 Larkin Street
(Planning Record No. 2025-011750PRJ; CEQA Case No. 2025-011750ENV)**

Dear Clerk Calvillo and Members of the Board of Supervisors:

On May 8, 2026, the Planning Department issued a Planning Approval Letter allowing the establishment of a 74-stall Fleet Charging facility at 1200 Larkin Street (Project). Over the last several years, the Board of Supervisors has demonstrated a concern about the impacts of Fleet Charging through adoption of new legislation including requiring Conditional Use authorization for Fleet Charging. The proposed Fleet Charging at 1200 Larkin Street avoided the scrutiny that the Conditional Use authorization process affords by relying on a loophole in the Planning Code whereby uses that would normally require a Conditional Use approval can be approved in historic buildings without undergoing Conditional Use approval. While the Planning Approval decision to approve the Project did not identify an end user, we can state with a high degree of certainty that Fleet Charging facilities of this size are intended to be used for autonomous (AV) operations, and AV fleet use is highly foreseeable at this location.

The Planning Approval Letter authorizing the Project relied on an exemption under the California Environmental Quality Act (CEQA). Pursuant to Chapter 31 of the San Francisco Administrative Code and CEQA, the undersigned appeals the Planning Department's April 30, 2026 determination that the Project is categorically exempt from CEQA under Guidelines section 15332 (the Class 32 exemption). This appeal is filed within 30 calendar days of the May 8, 2026 approval action, as identified in the Planning Approval Letter pursuant to S.F. Admin. Code section 31.04(h).

The Project proposes converting an existing two-level vacant automotive-use building at the corner of Bush and Larkin Streets into a 74-stall electric vehicle Fleet Charging facility that will foreseeably serve AV fleets, operating 24 hours per day and

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365 days per year. Planning's reliance on the Class 32 exemption fails on two independent grounds, summarized below. We reserve the right to supplement this appeal with additional briefing, expert analysis, and record evidence prior to the appeal hearing.

I. THE CLASS 32 EXEMPTION FAILS UNDER SECTION 15332(d)

The Class 32 categorical exemption under CEQA Guidelines Section 15332 applies to infill development projects that meet five conditions one of which states: “...(d) approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.” To address CEQA Guidelines Section 15332(d) underlined above, the City relied on a third-party consultant Fehr & Peers to provide a traffic analysis. The Fehr & Peers Transportation Study dated April 29, 2026 (Fehr & Peers Study), was prepared at the Planning Department’s direction and incorporated in the administrative record supporting Planning’s Class 32 CEQA Exemption Determination. The Fehr & Peers Study expressly concludes that the Project will generate up to **3,345,084 annual net new vehicle miles of travel (VMT)** under an AV scenario. (Fehr & Peers Study, Table 4 and Attachment B.) This figure includes 1,739,444 annual VMT from empty-vehicle “deadhead” repositioning and 3,331,035 annual VMT from AV-induced mode shift away from public transit, walking, and bicycling. The Fehr & Peers Study expressly acknowledges that AV uses can induce demand for additional vehicle trips and result in a substantial risk of declining transit use.

This conclusion was summarily ignored by Planning even though it constitutes substantial evidence supporting a fair argument of significant transportation impact from the Project. Under the fair-argument standard, any substantial evidence supporting a reasonable possibility of significant effect defeats the Class 32 categorical exemption (see *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086).

The Fehr & Peers Study suggests that the use of clean air vehicles would ensure that the Project would have less than a significant impact but this muddles the requirement under the Class 32 exemption and CEQA requirements establishing vehicle miles traveled as the significance criteria, not tailpipe emissions.

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Moreover, the Planning Department Class 32 CEQA Exemption Determination dated April 30, 2026 does not disclose or address the Fehr & Peers Study's VMT findings. The Department's entire substantive analysis of Section 15332(d) is a single sentence: that a "transportation memorandum" addressed "site access and circulation" and found no "significant queuing or operational impacts." Those conclusions completely ignore the reference to the Project's 3,345,084 annual net new VMT. Ignoring this vital fact renders the Class 32 determination defective. Finally, the Planning Department's own scoping document (the Transportation Study Determination request) identified VMT as a potentially significant impact, its retained consultant quantified that impact at 3.35 million **annual new VMT**, and the Department's Class 32 Exemption Determination then disregarded both--without analysis and without explanation.

II. THE UNUSUAL-CIRCUMSTANCES EXCEPTION UNDER SECTION 15300.2(c) INDEPENDENTLY BARS THE EXEMPTION

The Class 32 exemption, like most categorical exemptions under CEQA, is subject to exceptions under CEQA Guidelines Section 15300.2. The exceptions, including the unusual-circumstances exception of section 15300.2(c), operate as independent bars to a categorical exemption, even where the substantive criterion for a categorical exemption is otherwise met. The City's exemption findings must affirmatively address each potentially applicable exception based on substantial evidence in the record. The Planning Department's Class 32 Exemption Determination disposes of the unusual-circumstances exception with a single conclusory sentence: "There are no unusual circumstances that would result in a reasonable possibility of a significant effect." (Exemption Determination at 3.) That bare finding is unsupported by any reasoned analysis and is contradicted by the Department's own record:

- The City's own consultant acknowledges that "EV fleet charging is not a standard land use within the SF TIA Guidelines" (Fehr & Peers Study at 2) and that "no prescribed analysis methodology exists" for analyzing it (id. at 3).
- The Board of Supervisors' recent legislative activity concerning Fleet Charging, including requiring Conditional Use approval due to its unique and potentially severe land use impacts, demonstrates an intent to regulate the use more carefully. Yet, the Project relies on Planning Code section 202.11(d)(3) to bypass the Conditional Use review that would otherwise





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apply to Fleet Charging in the Polk NCD and then incorrectly relies on a CEQA exemption.

- It is foreseeable that the Project will operate 24 hours/365 days in a dense pedestrian-oriented neighborhood commercial district, a highly unusual circumstance.
- The Project is located on a Vision Zero High Injury Network, adjacent to Redding Elementary School, with one of its two access points "only wide enough to accommodate a single vehicle width" (Fehr & Peers Study at 2); and
- The Fehr & Peers Study's quantified VMT findings, discussed above, independently establish a fair argument of significant effect arising from these unusual circumstances.

This combination of factors satisfies both prongs of the unusual-circumstances exception: substantial evidence supports the existence of unusual circumstances, and the fair-argument standard is met by the City's own quantified findings. Ironically, it's the Department's own evidence in the form of the Fehr & Peers Study that identifies the existence of unusual circumstances.

RELIEF REQUESTED

The undersigned respectfully requests that the Board of Supervisors:

1. Reverse the Planning Department's April 30, 2026 CEQA Class 32 exemption determination.
2. Remand the Project with direction to prepare an appropriate environmental review with a focused initial study and addressing the transportation, air quality, and operational impacts identified in the administrative record.

We reserve all rights to supplement this appeal, to introduce additional evidence at the public hearing on this appeal and to incorporate by reference any additional comments submitted by other interested parties.

Sincerely,

Tony Delorio
Principal Officer
Teamsters Local 665

Main Office





PLANNING APPROVAL LETTER

Date: May 8, 2026
Planning Record No. 2025-011750PRJ
Project Address: 1200 Larkin Street
Zoning: NCD (Polk Street Neighborhood Commercial) Zoning District
Family and Senior Housing Opportunity Special Use District
80/120-R-4 Height and Bulk District
Block/Lot: 0278 / 008
Project Sponsor: Chloe Angelis
Reuben, Junius & Rose, LLP
One Bush Street
cangelis@reubenlaw.com | 4155679000
Staff Contact: Jonathan Vimr
Jonathan.Vimr@sfgov.org | 628-652-7319

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Project Description

The project proposes converting an existing, vacant automotive use building into an electric vehicle (EV) fleet charging facility. The project would not expand the building envelope or include changes to the exterior facades. It would also not result in any change to the use size of the subject property.

The facility would provide 74 EV charging spaces and three standard parking spaces for queuing or employee use. Charging infrastructure would include four Level 3 DC fast-charging stalls (served by two dual-port cabinets) and 70 Level 2 charging stalls. Level 3 chargers provide charging in approximately 25–45 minutes per vehicle, while Level 2 chargers require approximately 9–12 hours for a full charge, depending on vehicle characteristics.

The facility would serve fleet EV operations, with no tenant currently identified. Operations may include human-driven electric vehicles and/or autonomous electric vehicles (AEVs), with charging activity expected to occur primarily during off-peak periods, including overnight, depending on fleet needs.

The existing structure consists of two levels with separate access points: approximately 32 spaces on the first level (Larkin Street access) and approximately 45 spaces on the second level (single-lane Bush Street access). No changes to the building footprint or exterior improvements are proposed beyond installation of EV charging and supporting electrical equipment.

Project Approval

The Department has determined that the project complies with the objective standards of the Planning Code and has concluded its design review of the project. On April 30, 2026, the Project was determined to be exempt from the California Environmental Quality Act, ("CEQA") as a Class 32 Exemption under CEQA Guidelines Section 15332.

Approval Action for Purposes of CEQA Appeal Timelines Issuance of this Planning Approval Letter constitutes the approval action for the project for purposes of CEQA, pursuant to San Francisco Administrative Code section 31.04 (h).

The Department therefore approves the project as recorded in Planning Record No. 2025-011750PRJ. The plans for the approved project are attached to this approval.

CEQA Appeal Rights under Chapter 31 of the San Francisco Administrative Code

Typically, an appeal must be filed within 30 calendar days of the approval action identified above for purposes of CEQA appeal timelines for a project that has received an exemption (including a general plan evaluation) or negative declaration pursuant to CEQA. For information on filing an appeal under Chapter 31, contact the Clerk of the Board of Supervisors at City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102, or call 415.554.5184. If the Department has deemed a project to be exempt from further environmental review, an exemption determination has been prepared and can be obtained on the [San Francisco Property Information Map website](#) under the project's record number(s). Under CEQA, only issues that have previously been raised at a project hearing (including an appeal hearing) or in written correspondence to a City board, commission or department may be brought up by a litigant in a later court challenge.

Project Timeline

Table 1. Project Timeline

Action	Date
Project Sponsor submitted Preliminary Application	12/15/2025
Department staff deemed Application Complete (CAN)	12/22/2025
Department staff issued CEQA exemption	4/30/2026

Planning Code Findings

Planning Code Section 202.11

Refer to the attached Planning Approval for Adaptive Reuse of Historic Buildings document for relevant findings and analysis.

Priority Policies and General Plan Findings

Planning Code Section 101.1(b) establishes eight priority-planning policies and requires review of permits for consistency with said policies. On balance, the project complies with said policies and relevant findings within the General Plan.

Expiration

The authorization and right vested by virtue of this action is valid for three (3) years from the date of the Planning Approval Letter. The Project Sponsor must submit for a building permit by May 8, 2029. This Planning Approval Letter is not appealable. In addition, Assembly Bill 1114 regulates review of post entitlement phase permits. Post entitlement phase permits include building permits for housing development projects, which construct one unit or more. Post entitlement phase permits filed January 1, 2024 or later may not be appealed to the Board of Appeals. If the City finds that the permit is incomplete or does not comply with the permit standards, then an applicant may appeal to the governing body.

CC:

cangelis@reubenlaw.com

CPC.Closeout@sfgov.org

Attachments:

Adaptive Reuse of Historic Buildings Letter

Approved Plans

Class 32 Exemption including Environmental Screening Comments



PLANNING APPROVAL FOR ADAPTIVE REUSE OF HISTORIC BUILDINGS

May 8, 2026

Case Number: 2025-011750PRJ
BPA Number: TBD
Project Address: 1200 Larkin Street
Zoning: NCD (Polk Street Neighborhood Commercial District)
Block/Lot: 0278/008
Project Sponsor: Chloe Angelis
Reuben, Junius & Rose LLP,
One Bush Street
cangelis@reubenlaw.com
Staff Contact: Jonathan Vimr
jonathan.vimr@sfgov.org

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Property Information and Historic Status

The subject property occupies the entirety of the subject lot located at the northeast corner of the intersection of Bush and Larkin streets. Along its Bush Street frontage, it is mostly one-story in height with an attic atop before becoming two full stories due to the streets sloping. It includes a steel frame, brick exterior walls, and concrete flooring, a low parapet, divided lite wooden windows, and a cornice detailed with triglyphs, metopes, and circular medallions.

Determined to represent the Classical Revival style, the structure's character defining features are as follows: brick walls and brick patterning, the roofline of the building, the cornice, the courses of egg-and-dart molding, original window sash, the spandrel in the eastern wing facing Bush Street, and the structural steel frame. The painting on the bricks and non-original window frames are non-contributing features.

In the locally adopted Van Ness Auto Row survey, the subject structure was found eligible for listing in the California Register of Historical Resources as an individual property, with a similar determination being made for the National Register of Historic Places in a 1993 survey. As such, the site meets the definition of a Historic Building found in Section 102 of the Planning Code.

Current Proposal

The project proposes converting an existing vacant automotive use building into an electric vehicle (EV) fleet charging facility. The project would not expand the building envelope or include exterior structural modifications.

The facility would provide 74 EV charging spaces and three standard parking spaces for queuing or employee use. Charging infrastructure would include four Level 3 DC fast-charging stalls (served by two dual-port cabinets) and 70 Level 2 charging stalls. Level 3 chargers provide charging in approximately 25–45 minutes per vehicle, while Level 2 chargers require approximately 9–12 hours for a full charge, depending on vehicle characteristics.

The facility would serve fleet EV operations, with no tenant currently identified. Operations may include human-driven electric vehicles and/or autonomous electric vehicles (AEVs), with charging activity expected to occur primarily during off-peak periods, including overnight, depending on fleet needs.

The existing structure consists of two levels with separate access points: approximately 32 spaces on the first level (Larkin Street access) and approximately 45 spaces on the second level (single-lane Bush Street access). No changes to the building footprint or exterior improvements are proposed beyond installation of EV charging and supporting electrical equipment.

Environmental Determination

The Project is exempt from the California Environmental Quality Act (“CEQA”) as a Class 32 categorical exemption under CEQA Guidelines Section 15332.

Required Actions

Pursuant to Planning Code Sections 202.11 and 205.8, Historic Buildings (as defined in Planning Code Section 102) are eligible for greater land use flexibility to promote the ongoing preservation and adaptive reuse of properties designated or eligible for designation on a local, state, or federal register.

More specifically, Section 202.11(d)(3) states that within Neighborhood Commercial Districts any use that is Conditionally Permitted in the subject Zoning District shall be Principally Permitted in a Historic Building (with certain but in this case non-applicable exceptions).

In order for the project to proceed, the Planning Director must determine that allowing the proposed use will enhance the feasibility of adaptive reuse of the Historic Building.

Department staff must also determine that the project complies with the Secretary of the Interior’s Standards for Rehabilitation as well as any other applicable provisions of the Planning Code.

Findings

1. The project complies with the Planning Code.

The Project meets all applicable provisions of the San Francisco Planning Code.

2. The proposed use will enhance the feasibility of adaptive reuse of the Historic Building.

The subject site was previously occupied by a different type of Automotive Use, but has sat vacant for approximately 6 years. Allowing the proposed change in use would facilitate reactivation and maintenance of the historic building without affecting its exterior and/or any character-defining features.

3. The proposed change in use with no exterior work complies with the Secretary of the Interior's Standards for Rehabilitation in the following manner:

SOI Standard		Complies	Does Not Comply	N/A
1	A property will be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.	☒	☐	☐
2	The historic character of a property will be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property will be avoided.	☐	☐	☒
3	Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, will not be undertaken.	☐	☐	☒
4	Most properties change over time; those changes that have acquired historic significance in their own right will be retained and preserved.	☐	☐	☒
5	Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property will be preserved.	☒	☐	☐
6	Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features will	☐	☐	☒

	be substantiated by documentary, physical, or pictorial evidence.			
7	Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.	☐	☐	☒
8	Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.	☐	☐	☒
9	New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.	☐	☐	☒
10	New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	☐	☐	☒

The change in use from one kind of automotive use to another with no exterior changes would retain the essential form and integrity of the historic property. None of its character-defining features would be altered or destroyed.

Basis For Approval

- The Project promotes reactivation and stewardship of a historic automotive building with a new type of automotive use.
- The Project would activate a long-vacant historic resource along and near to active commercial corridors.
- The proposed Project meets all applicable requirements of the Planning Code.
- The Project would enhance the feasibility of adaptive reuse of the historic building.
- The Project complies with the Secretary of the Interior's Standards for Rehabilitation.

Planning Director Approval

Signature: 

Date: May 8, 2026

Sarah Dennis Phillips, *Planning Director*
San Francisco Planning Department



NOTE: RENDERING NOT FOR CONSTRUCTION USE

PROJECT INFORMATION

PROJECT NAME 1200 BUSH STREET (1200 LARKIN)	
PROJECT DESCRIPTION CHANGE OF USE TO CONVERT THE EXISTING AUTOMOTIVE USE BUILDING TO FLEET CHARGING USE AND INSTALL EV CHARGERS	
OCCUPANCY S 2	
PROPOSED USE S 2	TYPE OF CONSTRUCTION II A
PROJECT ADDRESS 1200 LARKIN ST SAN FRANCISCO CA 94109	
REQUIRED FIRE SEPARATION 1 HOUR RATED	FULLY SPRINKLERED NO
BLOCK/LOT BLOCK 3278 LOT 006	NUMBER OF STORIES 2 STORIES
PROJECT FLOOR AREA LEVEL 1 16,303 SF LEVEL 2 17,629 SF	GROSS BUILDING AREA 33,932 SF
ZONING POLK MCD	HEIGHT & BULK 30 A
SPECIAL USE DISTRICT FAULT AND SEISMIC HOUSING OPPORTUNITY	

CONTACT INFORMATION

OWNER: STERLING PHONE: 305 296 4354

CODE INFORMATION

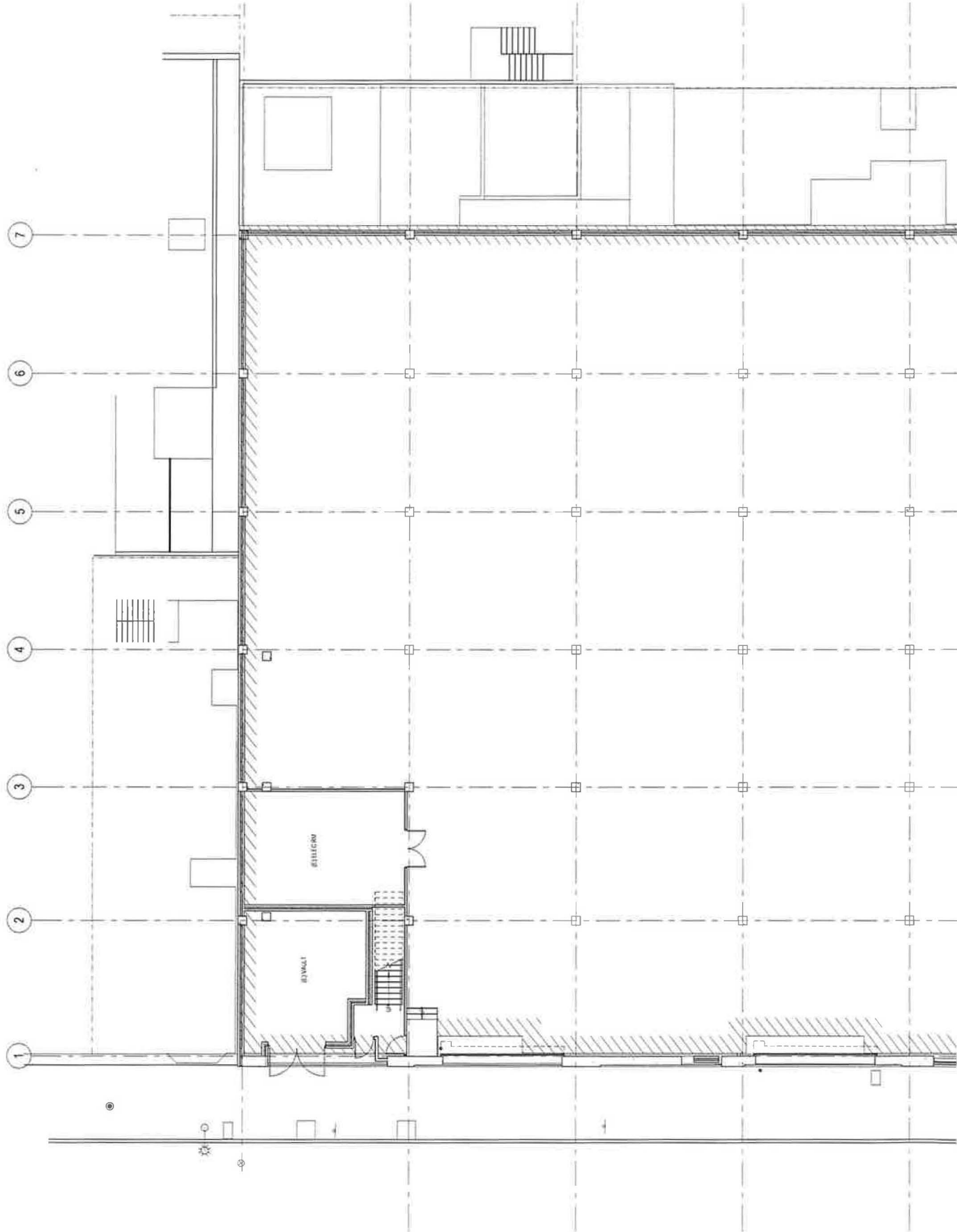
2021 CALIFORNIA ADMINISTRATIVE CODE (CAC)
PART 1 TITLE 24 CALIFORNIA CODE OF REGULATIONS (CCR)
2022 CALIFORNIA BUILDING CODE (CBC)
PART 2 TITLE 24 CCR BASED ON THE 2021 INTERNATIONAL BUILDING CODE (IBC)
2021 CALIFORNIA ELECTRICAL CODE (CEC)
PART 3 TITLE 24 CCR BASED ON THE 2020 NATIONAL ELECTRICAL CODE (NEC)
2022 CALIFORNIA MECHANICAL CODE (CMC)
PART 4 TITLE 24 CCR BASED ON THE 2021 UNIFORM MECHANICAL CODE (UMC)
2022 CALIFORNIA PLUMBING CODE
PART 5 TITLE 24 CCR BASED ON THE 2021 UNIFORM PLUMBING CODE (UPC)
2022 CALIFORNIA FIRE CODE (CFC)
PART 9 TITLE 24 CCR BASED ON THE 2021 INTERNATIONAL FIRE CODE (IFC)
LIFE SAFETY CODE
2009 NFPA 101 LIFE SAFETY CODE
ACCESSIBILITY CODE
CHAPTER 11118, 2016 CBC AND 2010 ADA (28 CFR PART 36)
ENERGY CODE
2022 CALIFORNIA ENERGY CODE - PART 6 TITLE 24 CCR
SIGN CODE
AMERICANS WITH DISABILITIES ACT (ADA) CBC (TITLE 24) & UF C (TITLE 19)
AND
CALIFORNIA A117.1 1992 (ACCESSIBILITY)
FIRE INSURED
Y/N
ELEVATORS
TITLE 8 - CIVILS 1 CHAPTER 4 SUBCHAPTER 8 CCR ASSEMBLY 1 2004
HEALTH DEPARTMENT REGULATIONS
CALIFORNIA DEPARTMENT OF PUBLIC HEALTH (CDPH)
HEALTHCARE DESIGN GUIDELINES
CHAPTER 4 CDR PART 2 TITLE 24 CCR AND TITLE 22 DIVISION 5 CCR
AUTHORITY HAVING JURISDICTION
CITY OF SAN FRANCISCO

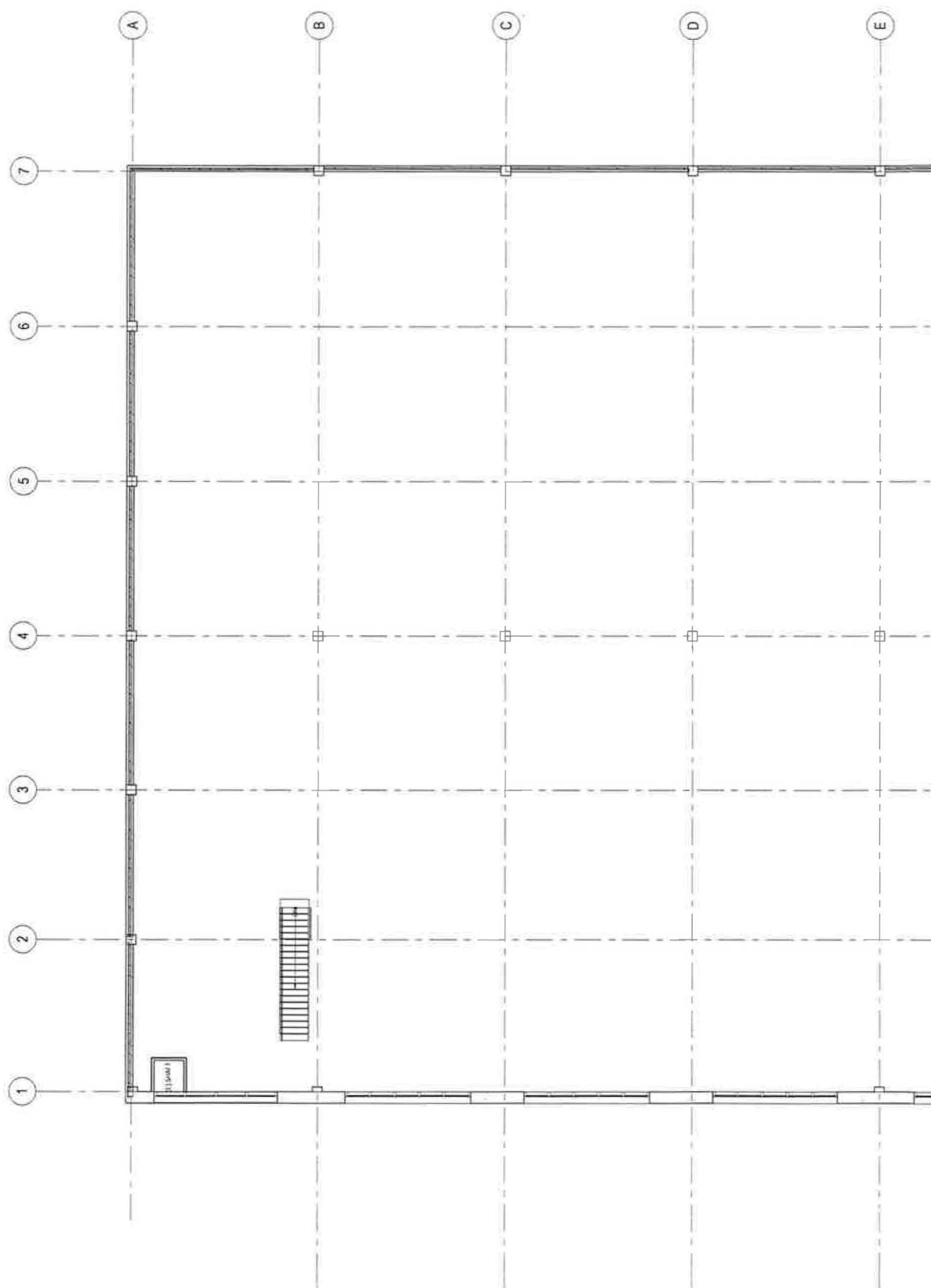
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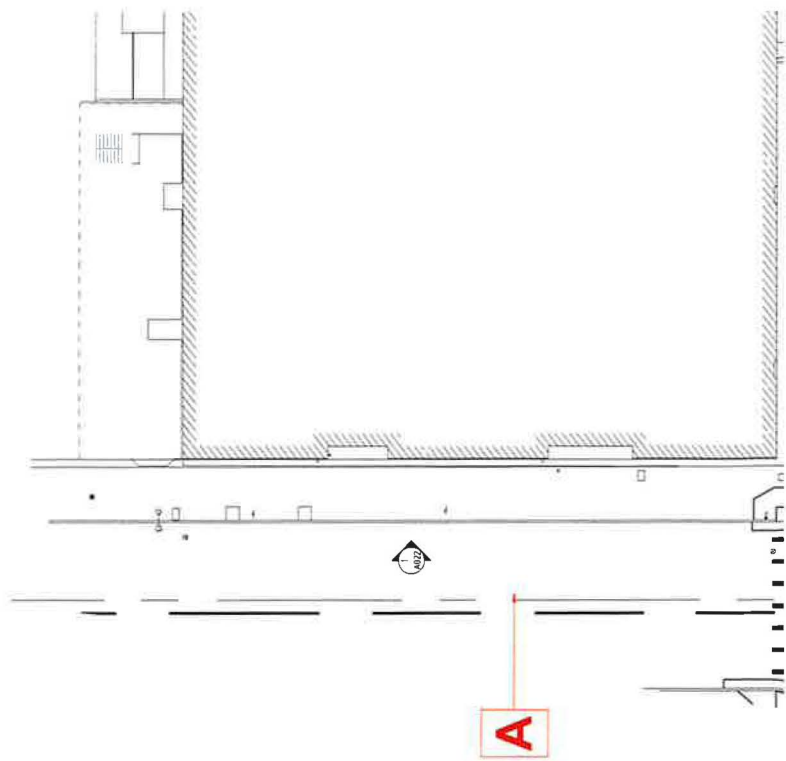
SYMBOL	SHEET NAME
0002	COVER SHEET
A001	SITE PHOTOS
A002	EXISTING EXTERIOR ELEVATIONS
A003	EXISTING FLOOR PLAN - LEVEL 01
A004	EXISTING FLOOR PLAN - LEVEL 02
A005	PARKING PLAN - LEVEL 01
A006	PARKING PLAN - LEVEL 02

FULL FLEET EV PARKING & CHARGING PORTS COUNT

LEVEL 1	
STANDARD PARKING SPACES	3
EV CHARGING SPACES	29
LEVEL 2	
EV CHARGING SPACES	45



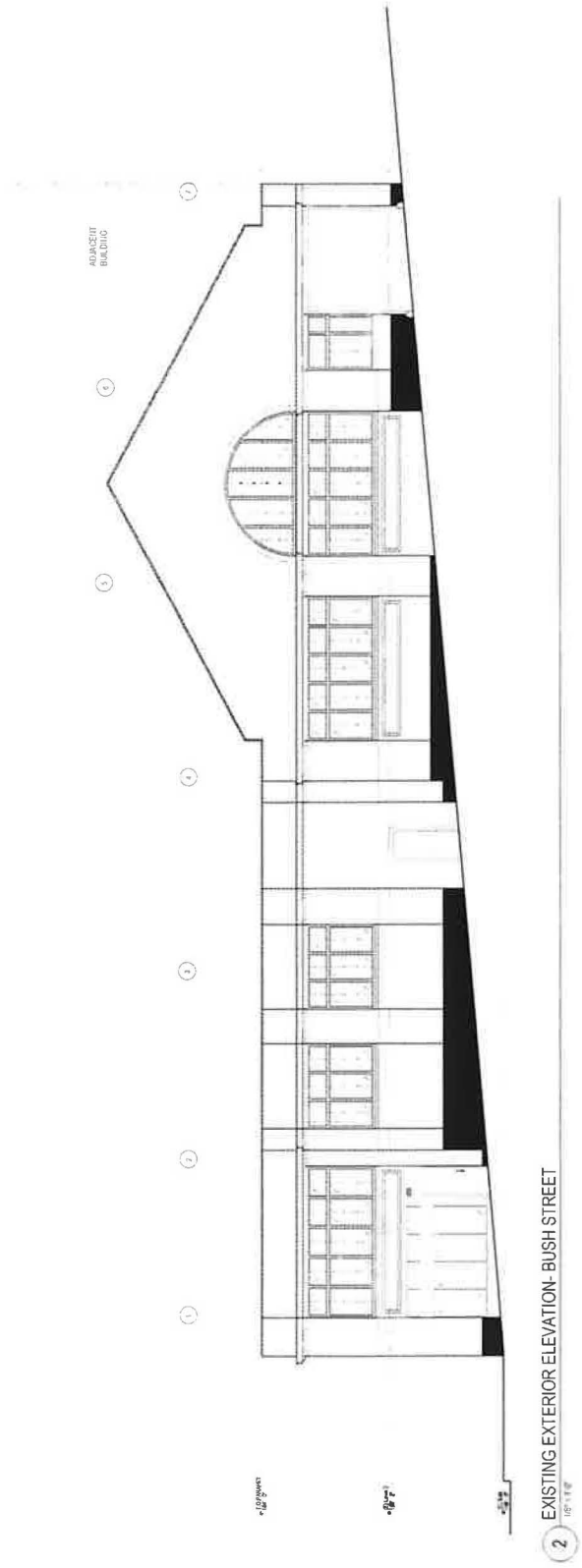
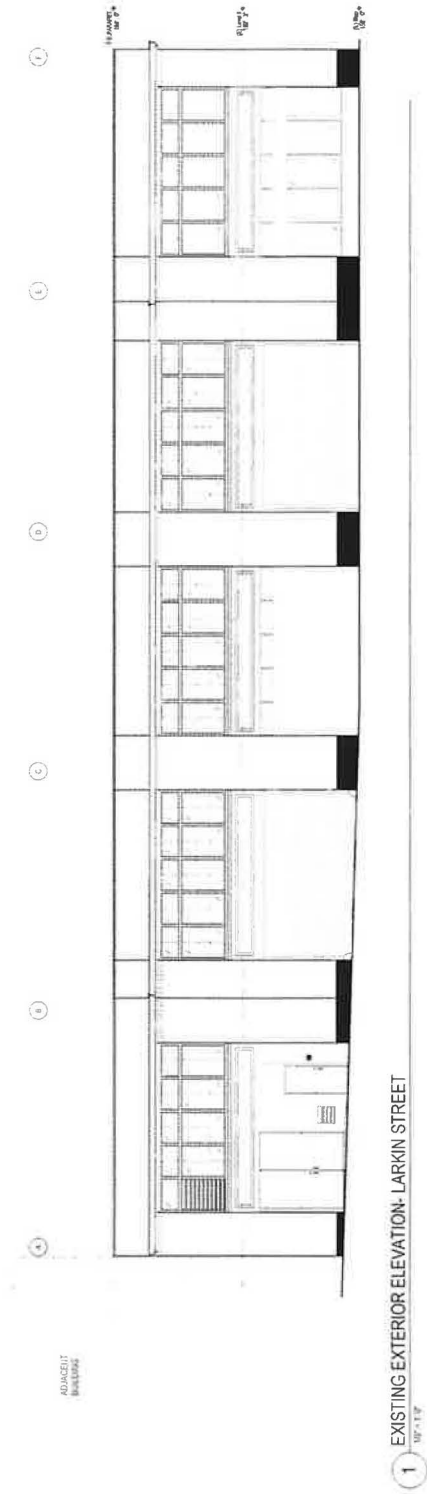


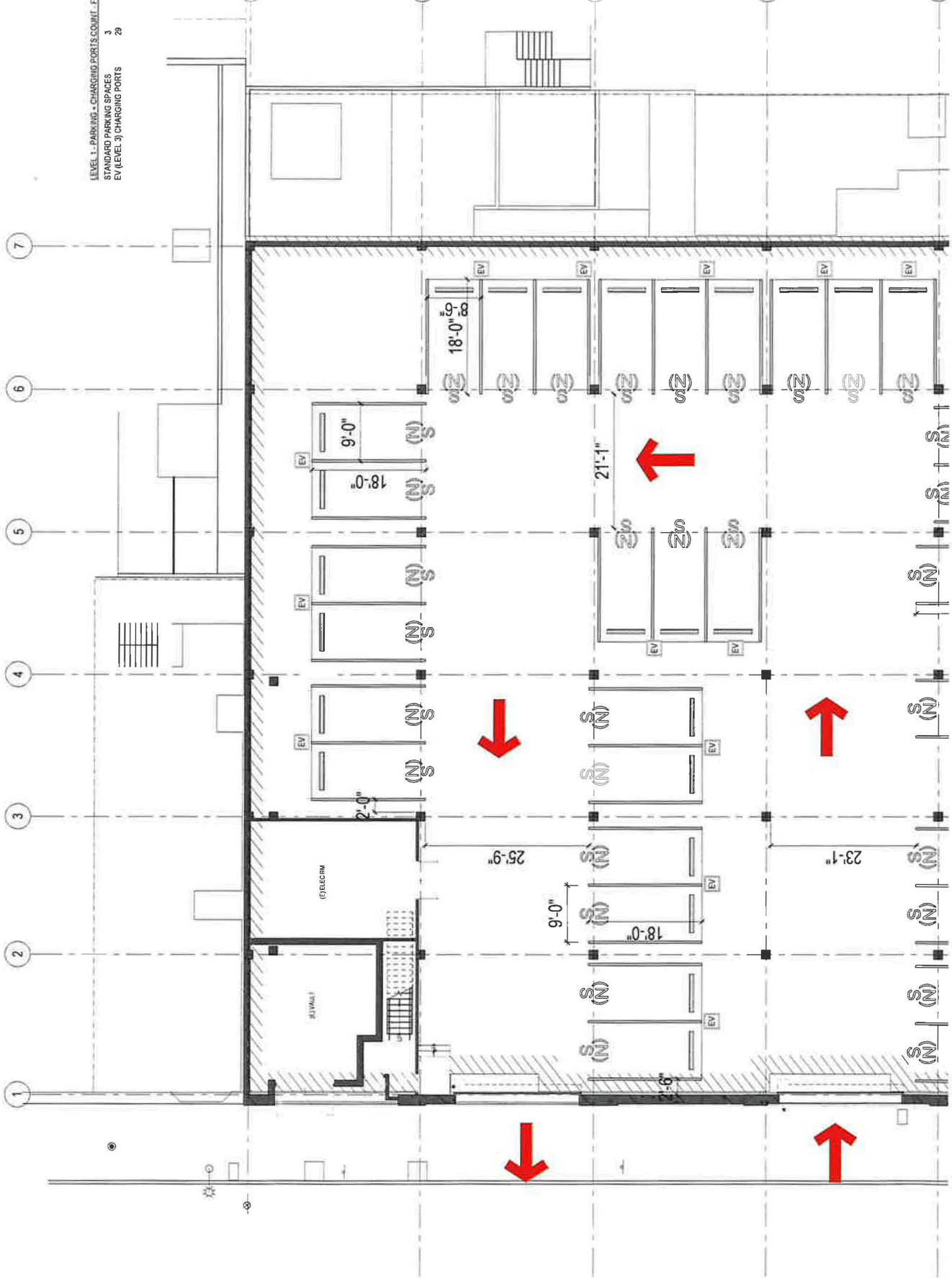


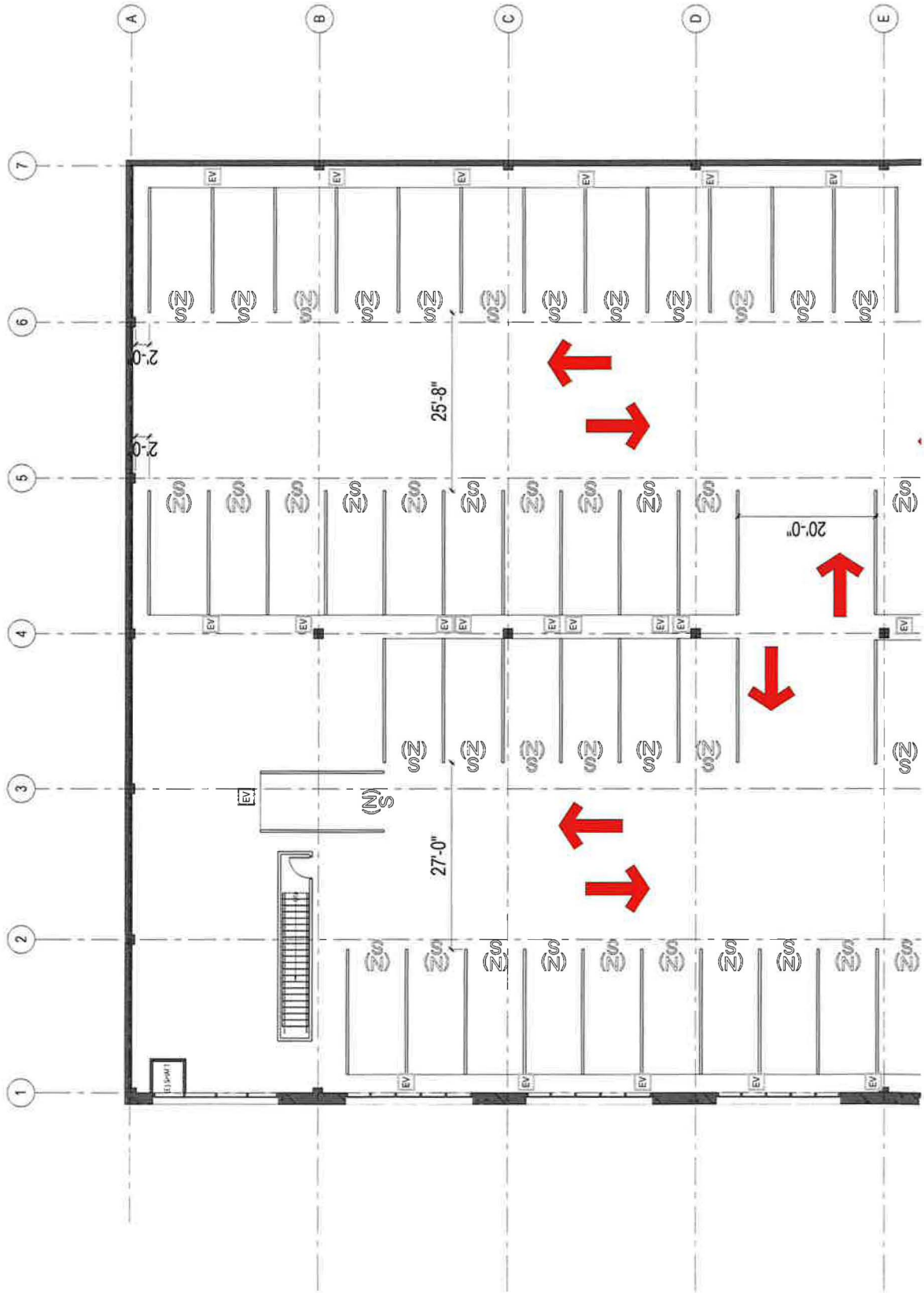
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EXISTING AND PROPOSED









CEQA Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)
1200 LARKIN ST		0278008
Case No.		Permit No.
2025-011750ENV		
☒ Addition/ Alteration	☐ Demolition (requires HRE for Category B Building)	☐ New Construction
Project description for Planning Department approval. The proposed project involves converting an existing vacant automotive use building into an electric vehicle (EV) fleet charging facility. The project would not expand the building envelope or include exterior structural modifications. See page 4 for a complete project description.		

EXEMPTION TYPE

The project has been determined to be exempt under the California Environmental Quality Act (CEQA).	
☐	Class 1 - Existing Facilities. (CEQA Guidelines section 15301) Interior and exterior alterations; additions under 10,000 sq. ft.
☐	Class 3 - New Construction. (CEQA Guidelines section 15303) Up to three new single-family residences or six dwelling units in one building; commercial/office structures; utility extensions; change of use under 10,000 sq. ft. if principally permitted or with a CU.
☒	Class 32 - In-Fill Development. (CEQA Guidelines section 15332) New Construction of seven or more units or additions greater than 10,000 sq. ft. and meets the conditions described below: (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. (b) The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses. (c) The project site has no value as habitat for endangered rare or threatened species. (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. (e) The site can be adequately served by all required utilities and public services.
☐	Other _____
☐	Common Sense Exemption (CEQA Guidelines section 15061(b)(3)). It can be seen with certainty that there is no possibility of a significant effect on the environment.

ENVIRONMENTAL SCREENING ASSESSMENT

Comments:

Please see page 4.

Planner Signature: Don Lewis

PROPERTY STATUS - HISTORIC RESOURCE

PROPERTY IS ONE OF THE FOLLOWING:

☒

Category A: Known Historical Resource.

☐

Category B: Potential Historical Resource (over 45 years of age).

☐

Category C: Not a Historical Resource or Not Age Eligible (under 45 years of age).

PROPOSED WORK CHECKLIST

Check all that apply to the project.

☒

Change of use and new construction. Tenant improvements not included.

☐

Regular maintenance or repair to correct or repair deterioration, decay, or damage to building.

☐

Garage work. A new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.

☐

Deck, terrace construction, or fences not visible from any immediately adjacent public right-of-way.

☐

Mechanical equipment installation that is not visible from any immediately adjacent public right-of-way.

☐

Dormer installation that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows*.

☐

Addition(s) not visible from any immediately adjacent public right-of-way for 150 feet in each direction; or does not extend vertically beyond the floor level of the top story of the structure, or does not cause the removal of architectural significant roofing features.

☐

Façade or storefront alterations that do not remove, alter, or obscure character -defining features.

☐

Restoration based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.

Note: Project Planner must check box below before proceeding.

☐

Project is not listed.

☐

Project involves scope of work listed above.

ADVANCED HISTORICAL REVIEW

Check all that apply to the project.

☐	Reclassification of property status. (Attach HRER Part I relevant analysis; requires Principal Preservation Planner approval) ☐ Reclassify to Category A ☐ Reclassify to Category C ☐ Lacks Historic Integrity ☐ Lacks Historic Significance
☐	Project involves a known historical resource (CEQA Category A)
☒	Project does not substantially impact character-defining features of a historic resource (see Comments)
☐	Project is compatible, yet differentiated, with a historic resource.
☒	Project consistent with the Secretary of the Interior Standards for the Treatment of Historic Properties
Note: If ANY box above is checked, a Preservation Planner MUST sign below.	
☒	Project can proceed with EXEMPTION REVIEW. The project has been reviewed by the Preservation Planner and can proceed with exemption review.
Comments by Preservation Planner: Change of use from a prior automotive use (Firestone Tires and auto repair) to another (fleet charging with no identified tenant). Interior work only, no changes whatsoever to the exterior under this project.	
Preservation Planner Signature: Jonathan Vimr	

EXEMPTION DETERMINATION

☒	No further environmental review is required. The project is exempt under CEQA. There are no unusual circumstances that would result in a reasonable possibility of a significant effect.	
	Project Approval Action: Planning Approval Letter	Signature: Don Lewis 04/30/2026
	If discretionary review before the planning commission is requested, the discretionary review hearing is the approval action for the project. If no discretionary review is requested, the issuance of a Planning Approval Letter is the approval action.	
	Supporting documents are available for review on the San Francisco Property Information Map, which can be accessed at https://sfplanninggis.org/pim/ . Individual files can be viewed by clicking on the Planning Applications link, clicking the "More Details" link under the project's environmental record number (ENV) and then clicking on the "Related Documents" link. Once signed and dated, this document constitutes an exemption pursuant to CEQA Guidelines and chapter 31 of the San Francisco Administrative Code. Per chapter 31, an appeal of an exemption determination to the Board of Supervisors shall be filed within 30 days after the approval action occurs at a noticed public hearing, or within 30 days after posting on the planning department's website (https://sfplanning.org/resource/ceqa-exemptions) a written decision or written notice of the approval action, if the approval is not made at a noticed public hearing.	

Full Project Description

The proposed project involves converting an existing vacant automotive use building into an electric vehicle (EV) fleet charging facility. The project would not expand the building envelope or include exterior structural modifications.

The facility would provide 74 EV charging spaces and three standard parking spaces for queuing or employee use. Charging infrastructure would include four Level 3 DC fast-charging stalls (served by two dual-port cabinets) and 70 Level 2 charging stalls. Level 3 chargers provide charging in approximately 25–45 minutes per vehicle, while Level 2 chargers require approximately 9–12 hours for a full charge, depending on vehicle characteristics.

The facility would serve fleet EV operations, with no tenant currently identified. Operations may include human-driven electric vehicles and/or autonomous electric vehicles (AEVs), with charging activity expected to occur primarily during off-peak periods, including overnight, depending on fleet needs.

The existing structure consists of two levels with separate access points: approximately 32 spaces on the first level (Larkin Street access) and approximately 45 spaces on the second level (single-lane Bush Street access).

No changes to the building footprint or exterior improvements are proposed beyond installation of EV charging and supporting electrical equipment.

Environmental Screening Comments (Continued)

Class 32, criterion a: The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

Class 32, criterion b: The project is within city limits on a project site of no more than five acres substantially surrounded by urban uses. Accordingly, the project site is less than five acres substantially surrounded by urban uses.

Class 32, criterion c, natural habitat: The project site is within a developed urban area. The project site has no significant riparian corridors, estuaries, marshes, wetlands, or any other potential wildlife habitat that might contain endangered, rare or threatened species. Thus, the project site has no value as habitat for rare, threatened, or endangered species.

Class 32, criterion d, traffic: A transportation memorandum was prepared for the proposed project to evaluate site access and circulation and determined that the project would not result in significant queuing or operational impacts. Planning department transportation staff have reviewed the memorandum and determined that no additional transportation analysis is required.

Noise: The proposed project would use typical construction equipment that would be regulated by Article 29 of the Police Code (section 2907, Construction Equipment). No impact pile driving or nighttime construction is required. Construction vibration would not be anticipated to affect adjacent buildings. The proposed project would not generate sufficient vehicle trips to noticeably increase ambient noise levels, and the project's fixed noise sources, such as heating, ventilation, and air conditioning systems, would be subject to noise limits in Article 29 of the Police Code (section 2909, Noise Limits). Therefore, no significant noise impact would occur.

Air Quality: The proposed project's construction would be subject to the Dust Control Ordinance (Article 22B of the Health Code). The proposed land uses are below the Bay Area Air Quality Management District's construction and operational screening levels for requiring further quantitative criteria air pollutant analysis. The project site is located within an air pollutant exposure zone but the project is limited to interior renovation and does not propose excavation. Thus, no significant construction or operational air quality impacts would occur.

Water Quality: The project's construction activities are required to comply with the Construction Site Runoff Ordinance (Public Works Code, article 2.4, section 146). Stormwater and wastewater discharged from the project site during operations would flow to the City's combined sewer system and be treated to the standards in the City's National Pollution Discharge Elimination System permit. Therefore, no significant water quality impact would occur.

Class 32, criterion e, utilities and public services: The existing buildings on the project site are already adequately served by existing utilities and public services. The project would not change that existing condition and therefore the project would not increase demand in a manner that could result in significant impacts related to utilities and public services.

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