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TO:

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

DATE: November 17, 2017

RE: BOS File No. 171147

**REQUEST FOR RECUSAL OF SUPERVISOR HILLARY RONEN FROM
PARTICIPATION IN APPEAL OF CEQA DETERMINATION AND DISPOSITION ON
"HAIRBALL INTERSECTION IMPROVEMENT PROJECT"**

Appellant objects to any participation by Supervisor Hillary Ronen in the above-described CEQA appeal to the Board of Supervisors due to her predisposition to deny this appeal and her personal interest in, and promotion of, the Hairball Project.

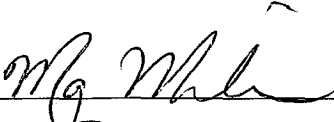
Ms. Ronen has publicly stated that both she and her husband have a personal interest in the "Hairball" Project. For example, Ms. Ronen has stated that her husband "regularly bikes across the Hairball on his way to work in the public defender's office." (See Rachel Swan, "S.F. Supervisor pushes to untangle freeway Hairball," *San Francisco Chronicle*, 8/4/17.) Contrary to the public interest, Ronen states that she "has refused to let cost projections get in the way of her vision. 'I don't want us to be limited by finances,' she said. 'I want to think big.'" (*Id.*)

In pushing for her "vision," Ronen has also stated that she "drives past the Hairball every day while taking her daughter to school." (Joe Fitzgerald Rodriguez, "New plan to ban encampments at 'Hairball' emerges as homeless and cyclists clash," *San Francisco Examiner*, 10/1/17.) Ms. Ronen further announced her self-serving motivation to evict homeless people who may be camping near areas where she, her husband, and the San Francisco Bicycle Coalition wish to install new bicycle "improvements" as part of the Hairball Project, stating: "'We're going to do everything we can to block off and make it impossible to camp in the Hairball.'" (*Id.*)

CEQA requires that this Board determine any CEQA appeal objectively. Ms. Ronen has already publicly stated that she is committed to approving the Project. Such predisposition violates CEQA's requirement of objective decisionmaking by public agencies. (See, e.g., *Citizens for Ceres v. Superior Court* (2013) 217 Cal.App.4th 889, 917-919 [agency must be objectively conduct environmental review before approving a project]; *Save Tara v. City of West Hollywood* (2008) 45 Cal. 4th 116, 132-134 [CEQA prohibits an agency's commitment to a project before

environmental review has been completed]; *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 394.)

Ms. Ronen should therefore recuse herself from participating in this Appeal and any other determination on the "Hairball" Project.



Mary Miles