

# *FRIENDS OF ST. THOMAS MORE*

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March 13, 2025

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San Francisco Board of Supervisors

1 Dr. Carlton B. Goodlett Place

City Hall, Room 244

San Francisco, CA 94102-4689

Ref: Appeal of California Environmental Quality Act (CEQA)

Exemption Determination, Case No. 2023-007010ENV

Dear Supervisors,

We are appealing the CEQA Exemption Determination of the above referenced case for Project Address 1310 Junipero Serra Boulevard in San Francisco on the following grounds:

1. The project is not consistent with infill development intentions stated in CEQA handbook 2025  
[https://www.califaep.org/docs/CEQA Handbook 2025combined.pdf](https://www.califaep.org/docs/CEQA%20Handbook%202025combined.pdf)
2. CEQA Class 32 exemptions apply to small-scale urban landfill projects intended for residential, commercial, or mixed use developments. This project is a large scale industrial maintenance facility and does not align with the intent of this exemption.  
§.21061.3 INFILL SITE "Infill site" means a site in the urbanized area that meets either of the following criteria: (a) The site has not been previously developed for urban uses and both of the following apply: (1) The site is immediately adjacent to parcels that are developed with qualified urban uses, or at least 75% of the perimeter of the site adjoins parcels that are developed with urban uses and the remaining 25% of the site adjoins parcels that have previously been developed for qualified urban used. (2) No parcel within the site has been created within the past 10 years unless the parcel was created as a result of the plan of a redevelopment agency. (b) the site as been previously developed for qualified urban users.

CEQA Class 32 applies only to projects that will not cause significant environmental impacts. CEQA App. G Checklist VII Hazards and Hazardous Materials list project considerations that would create a significant hazard to the neighbors and adjacent schools that are within one-quarter mile of existing schools.

This facility poses substantial risks, including **air pollution**: emissions from fuel storage, pesticides, fertilizers and maintenance equipment will affect air quality, particularly near vulnerable school children causing potential threats to their overall health and well being. **Noise Pollution**: continuous operation of heavy machinery will create noise disturbances that affect students and the surrounding community. **Water Contamination**: the project poses a high risk of stormwater and groundwater contamination.

**Proximity to Sensitive Receptors**: The project's location is directly adjacent to Utopia Preschool, St. Thomas More School, Alma Via Senior Living, St. Thomas More Church and Brandeis Hillel School. It presents serious health and safety concerns, as young children and elderly receptors are more susceptible to the adverse effects of exposure to pollutants. CEQA does not allow exemptions for projects that pose potential harm to sensitive populations.

The City has not provided any evidence that the Project would not during construction or ongoing as operational pose significant effects especially regarding noise and air quality. The schools in the area are sensitive receptors and could be significantly impacted. The City needs to analyze this project to understand these potential impacts.

3. Lack of environmental report poses the question about protected wildlife. Since the 1950's the proposed building site has been home to a rare plant species called the SF Bay Spineflower. There have been no known steps taken to ensure the preservation of this species. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA or those considered to be functionally equivalent to CEQA as they meet the definition of Rare or Endangered under CEQA Guidelines §15125 (c) and/or § 15380.

4. Even if the above studies are conducted and proved to not incur a significant impact, is a private golf course an infill development? The golf course is not surrounded by urban uses and does not provide public benefit. Private golf courses are restricted to members only, limiting public access which is a key characteristic of urban land use.

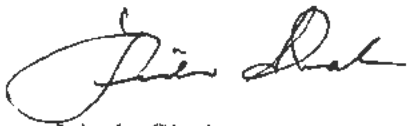
See infill of a golf course project here:

<https://sfyimby.com/2024/06/plans-for-housing-at-pruneridge-golf-club-santa-clara.html>

Development of a housing complex on a golf course required a CEQA study.

If any further information is required, please free to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Shah", with a large, stylized initial "L".

Linda Shah  
415-218-0401



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## CEQA Exemption Determination

### PROPERTY INFORMATION/PROJECT DESCRIPTION

<b>Project Address</b>		<b>Block/Lot(s)</b>
1310 Junipero Serra Boulevard		7380005, 7380036
<b>Case No.</b>		<b>Permit No.</b>
2023-007010ENV		
<input type="checkbox"/> <b>Addition/ Alteration</b>	<input checked="" type="checkbox"/> <b>Demolition (requires HRE for Category B Building)</b>	<input checked="" type="checkbox"/> <b>New Construction</b>
<b>Project description for Planning Department approval.</b>  The San Francisco Golf Club proposes the demolition of nine maintenance and facility structures (totaling approximately 10,455 square feet in size) and construction of a 25-foot-tall, one-story maintenance building approximately 20,000 gross square feet in size. The proposed building would house administration offices for maintenance staff, equipment storage, and a repair shop.  PLEASE SEE FULL PROJECT DESCRIPTION ON PAGE 4.		

### EXEMPTION TYPE

<b>The project has been determined to be exempt under the California Environmental Quality Act (CEQA).</b>	
<input type="checkbox"/>	<b>Class 1 - Existing Facilities.</b> (CEQA Guidelines section 15301) Interior and exterior alterations; additions under 10,000 sq. ft.
<input type="checkbox"/>	<b>Class 3 - New Construction.</b> (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.
<input checked="" type="checkbox"/>	<b>Class 32 - In-Fill Development.</b> (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.
<input type="checkbox"/>	<b>Other</b> _____
<input type="checkbox"/>	<b>Common Sense Exemption (CEQA Guidelines section 15061(b)(3)).</b> It can be seen with certainty that there is no possibility of a significant effect on the environment.

## ENVIRONMENTAL SCREENING ASSESSMENT

### Comments:

PLEASE SEE PAGES 5-6.

Planner Signature: Don Lewis

## PROPERTY STATUS - HISTORIC RESOURCE

### PROPERTY IS ONE OF THE FOLLOWING:

<input type="checkbox"/>	Category A: Known Historical Resource.
<input checked="" type="checkbox"/>	Category B: Potential Historical Resource (over 45 years of age).
<input type="checkbox"/>	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.

<input type="checkbox"/>	Change of use and new construction. Tenant improvements not included.
<input type="checkbox"/>	Regular maintenance or repair to correct or repair deterioration, decay, or damage to building.
<input type="checkbox"/>	Window replacement that meets the Department's <i>Window Replacement Standards</i> .
<input type="checkbox"/>	Garage work. A new opening that meets the <i>Guidelines for Adding Garages and Curb Cuts</i> , or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
<input type="checkbox"/>	Deck, terrace construction, or fences not visible from any immediately adjacent public right-of-way.
<input type="checkbox"/>	Mechanical equipment installation that is not visible from any immediately adjacent public right-of-way.
<input type="checkbox"/>	Dormer installation that meets the requirements for exemption from public notification under <i>Zoning Administrator Bulletin No. 3: Dormer Windows</i> .
<input type="checkbox"/>	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.
<input type="checkbox"/>	Façade or storefront alterations that do not remove, alter, or obscure character-defining features.
<input type="checkbox"/>	Restoration based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.
<b>Note: Project Planner must check box below before proceeding.</b>	
<input checked="" type="checkbox"/>	Project is not listed.
<input type="checkbox"/>	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:

Project proposes to demolish 8 non-historic (not age-eligible) accessory structures and 1 age-eligible accessory structure with no work proposed to the primary building(s). Replacement structure is compatible and differentiated.

**Preservation Planner Signature:** Natalia Fossi

## 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 Commission Hearing

### Signature:

Don Lewis

04/05/2024

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 approximately 164-acre San Francisco Golf Club property is generally bordered by Brotherhood Way to the north, Junipero Serra Boulevard to the east, Wilshire Avenue (Daly City) to the south, and Lake Merced Boulevard to the west in the Lakeshore neighborhood. The project site, where construction would occur, consists of an approximately 1.7-acre (75,473 square feet) portion immediately west of Thomas More Way.

The San Francisco Golf Club proposes the demolition of nine maintenance and facility structures (totaling approximately 10,455 square feet in size) and construction of a 25-foot-tall, one-story maintenance building approximately 20,000 gross square feet in size. The proposed building would house administration offices for maintenance staff, equipment storage, and a repair shop.

The project would include the following components: a covered fueling and washing station; approximately 210 lineal feet of retaining wall (up to 5 feet in retained height) along the eastern boundary and northeastern boundary of the site; a surface parking area with 25 spaces for employees and staff; a new storm drain (approximately 1,500 linear feet); a bioretention area; and removal of 125 eucalyptus gum trees and planting of 45 new trees.

Access to the proposed building would be through the existing member access vehicular gate via an existing private drive connecting to Thomas More Way. The proposed building would be set back from the street by more than 25 feet and from the adjacent neighbor to the north by approximately 20 feet. There would be new landscaping in between the existing sidewalk and new fence. A series of planted areas are proposed to screen the building, and a south facing rooftop solar array is proposed.

Project construction would require approximately 8,550 cubic yards of excavation with a maximum depth of approximately 7 feet below ground surface. Construction duration is estimated for 12 months. The proposed building *would be supported on a shallow building foundation.*

## Environmental Screening Comments

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. While the private golf club occupies approximately 164 acres, the project – including all demolition and construction of hardscape and landscape – is limited to an approximately 1.7-acre (75,473 square feet) portion. Accordingly, the project site is less than five acres substantially surrounded by urban uses.

Class 32, criterion c, natural habitat: The project site where the new building would be constructed is in a heavily vegetated area immediately adjacent to a developed urban area to the north and east, and maintained golf course grasses and existing maintenance facilities to the south and west. The proposed project would include the removal of 125 non-native, eucalyptus gum trees. The removal of these trees does not require a permit from San Francisco, as the trees are not considered significant or landmark trees as defined by Article 16 (Urban Forestry Ordinance) of the San Francisco Public Works Code. As a result of the proposed project, 45 new trees would be planted. 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: The proposed project would not exceed any applicable transportation screening criteria. The proposed project would result in low p.m. peak volume of vehicle trips compared to existing conditions. Accordingly, the project would not result in a significant impact related to traffic and additional transportation review is not 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) and would be required to submit a site-specific dust control plan to the San Francisco Department of Public Health (DPH). 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 not located within an air pollutant exposure zone and would not add new stationary sources of toxic air contaminants. 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). Since the project would disturb over 5,000 square feet, the project sponsor would be required to submit an Erosion Sediment Control Plan or a Stormwater Pollution Prevention Plan, and a Construction Site Runoff Control Project Application to SFPUC. 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 private golf club is 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.

Archaeological Resources: On February 20, 2024, planning department staff archaeologists conducted archaeological sensitivity assessment testing at the project site. No significant archaeological resources were discovered. Based on the negative results of the testing and a review of in-house archaeological documentation, it is unlikely that archaeological features or artifacts would be encountered during project construction. The department's staff archaeologists determined on February 21, 2024 that no CEQA-significant archeological resources are expected within project-affected soils.



## **Environmental Screening Comments (Continued)**

**Hazardous Materials:** The project is subject to the Maher Ordinance (Article 22A of the Health Code), which is administered by the department of public health (DPH). On April 1, 2024, DPH received the applicant's Maher application. Compliance with the Maher Ordinance will ensure that the project would not result in a significant impact with regard to hazardous materials.

**Geology and Soils:** A geotechnical report was prepared by A3GEO, Inc. (dated August 23, 2023). The project's structural drawings would be reviewed by the building department, where it would be determined if further geotechnical review and technical reports are required. Compliance with the State and local building codes pursuant to the development review process implemented by the building department will ensure that the proposed project would not result in a significant impact with regard to geology and soils.

**Public Notice:** A "Notification of Project Receiving Environmental Review" was mailed on December 26, 2023 to adjacent occupants and owners of buildings within 300 feet of the project site and to the Lakeshore neighborhood group list.

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DAVID F. JOY

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San Francisco Planning Department

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*David F. Joy*

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