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GENERAL PLAN EVALUATION APPEAL

2395 Sacramento Street

Date: January 16, 2024
To: Angela Calvillo, Clerk of the Board of Supervisors
From: Lisa Gibson, Environmental Review Officer – (628) 652-7571
Sherie George - sherie.george@sfgov.org (628) 652-7558

RE: Board File No. 231285
Planning Case No. **2022-004172ENV** and 2022-004172APL
Appeal of General Plan Evaluation for 2395 Sacramento Street

Hearing Date: January 23, 2024
Attachment(s): A – Historic Resource Evaluation Response (HRER), August 18, 2023.
B – Historic Resource Evaluation Response Part 2 (HRER Part 2), September 28, 2023.
C - Pedestrian Wind Assessment 2395 Sacramento Street, San Francisco, CA. December 16, 2022.
D - *Pedestrian Level Wind Assessment 2395 Sacramento Street, San Francisco, CA.* October 12, 2023.
E – 2395 Sacramento Street Shadow Fan, August 24, 2022

Project Sponsor: Eduardo Sagues, Gokovacandir, LLC, (203) 500-3766
Appellant: Richard Toshiyuki Drury of Lozeau Drury LLP, on behalf of Jonathan Clark

Introduction

This memorandum and the attached documents are a response to the December 8, 2023 letter of appeal to the board of supervisors (the board) regarding the Planning Department's (the department's) issuance of a general plan evaluation (GPE) determination under the San Francisco Housing Element 2022 Update Final Environmental Impact Report (Housing Element EIR or HE EIR) for the proposed 2395 Sacrament Street project in compliance with the California Environmental Quality Act (CEQA). On January 12, 2024, the department received a supplemental letter of appeal dated January 12, 2024, which is not addressed herein. The department may submit a separate response to that information.

As described below, the appellant has not demonstrated nor provided substantial evidence to support a claim that the GPE fails to conform to the requirements of CEQA for a development project consistent with a community plan or zoning or the general plan pursuant to CEQA section 21083.3 and CEQA Guidelines section 15183. Accordingly, based solely upon the information presented by the appellant, the planning

department would recommend that the board of supervisors uphold the department's determination for the GPE and reject the appeal.

The department, pursuant to CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code, determined that the project is consistent with the development density established by zoning, community plan, and general plan policies in the San Francisco Housing Element 2022 Update for the project site, for which a programmatic EIR (PEIR) was certified and issued the GPE for the project on October 23, 2023. In these circumstances, CEQA limits the city's review to consideration of the following factors:

1. Whether there are significant effects that are peculiar to the project or its parcel, not examined in the PEIR;
2. Whether the effects were already analyzed as significant effects in the PEIR;
3. Whether the effects are potentially significant off-site or cumulative impacts that were not discussed in the PEIR;
4. Whether there is substantial new information that was not known at the time the Housing Element 2022 Update EIR was certified, which indicates that a previously identified significant impact had a more severe adverse impact than was discussed in the PEIR.

If an impact is not peculiar to the project, has been addressed as a significant impact in the PEIR, or can be substantially mitigated by imposition of uniformly applied development policies or standards, then CEQA provides that an additional EIR need not be prepared for the project.

Accordingly, the department conducted project-specific analysis to evaluate whether the project would result in new significant environmental effects, or effects of greater severity than were already analyzed and disclosed in the PEIR. The department conducts environmental analysis based upon the scope of the physical changes to the environment that would occur with a project. Based on this analysis, the department determined that the project is exempt from further environmental review beyond what was conducted in the GPE initial study and the Housing Element 2022 Update EIR in accordance with CEQA section 21083.3 and CEQA Guidelines section 15183. This analysis is presented in the project-specific GPE initial study and is supported by substantial evidence in the record.

The decision before the board is whether to uphold the planning department's determination that the project is not subject to further environmental review beyond that conducted in the GPE initial study and the PEIR pursuant to CEQA section 21083.3 and CEQA Guidelines section 15183 and deny the appeal, or to overturn the department's CPE determination for the project and return the GPE to the department for additional environmental review. The board's decision must be based on substantial evidence in the record. See CEQA Guidelines section 15183(b) and (c).

Site Description and Existing Use

The 15,105-square-foot (sf) project site is located within the Pacific Heights neighborhood of San Francisco, near the Japantown and Upper Fillmore neighborhood commercial areas. It is bounded by Sacramento Street to the north, Buchanan Street to the east, California Street to the south, and Webster Street to the west.

The project site is comprised of two lots (Block 0637, Lots 015 and 016). Lot 015 is a vacant 3,497-sf lot. Lot 016 is 11,608 square feet in size and occupied by an existing three-story former library building with a basement and attic, a gated paved surface area, and a children's playground structure and open area. The existing building on the project site is designated as San Francisco Landmark No.115, Health Sciences Library, which was constructed in 1912.[1] It is currently used as an events venue. The paved surface area can be accessed from a curb cut on Sacramento Street. The children's playground structure is located immediately to the east of the existing building. The project site frontage along Sacramento Street slopes at an average grade of 13.3 percent, with the eastern corner of the building at grade and a full floor higher than the westernmost elevation at the corner of Webster Street.

The project site is directly across from Sutter Health's California Pacific Medical Center Pacific Heights Outpatient Center and two blocks west of Lafayette Park. East of the project site, on the same block, are multi-story residential uses; to the south is a three-unit residential building and the historic Congregation Sherith Israel building, constructed in 1905. To the north of the project site is the Sutter Health medical center and medical offices (roughly 40-50 feet in height); on the northwest corner of Sacramento and Webster streets is a 10-story residential building (roughly 128 feet in height), and to the west are residential buildings (roughly 35 to 50 feet in height).[2]

Project Description

The 2395 Sacramento Street Project (project) would:

- Merge two existing lots into one lot;
- Adaptively reuse an approximately 68-foot-tall, 24,850-gross-square-foot (gsf) city landmark building at 2395 Sacramento Street for residential use; and
- Construct two horizontal additions to the existing building: a six-story, approximately 68-foot-tall addition along Webster Street (Webster addition) and an approximately 78-foot-tall addition along Sacramento Street (Sacramento addition).

The project would result in a 66,311-gsf building with 24 dwelling units.

The project would retain the majority of the existing building. The Webster addition would be constructed within the vacant lot; the Sacramento addition would be constructed within the area east of the existing building. The Sacramento addition would be approximately 77.5 feet in height (87.5 feet to the top of the stair penthouse) and include seven levels of residential use over below-grade[3] parking (eight stories total). The proposed Webster addition would be 68 feet in height (72 feet to the top of the stair penthouse) and provide five levels of residential use above a garage, along with a rooftop deck (six stories total).[4] The building's existing use as an events venue would change to create 24 dwelling units.

[1] 2395 Sacramento Street has historically functioned as a medical library and has been known historically as the Lane Medical Library, Health Sciences Library, and Medical Sciences Library.

[2] The University of the Pacific School of Dentistry, which previously existed to the northwest of the project site, was converted to residential use. See Planning Department Case No. 2013.0027PRJ 2101 & 2155 Webster Street for additional project details.

[3] The parking would be partially below-grade. The garage entrance along Webster Street would be at grade, however since the parking would be located on the eastern portion of the site, due to the slope of the project site the parking would be below-grade.

[4] All building heights herein are as measured under Planning Code sections 260(a) and 260(b).

The new garage would include 26 vehicle parking spaces and 38 class 1 bicycle spaces and be accessed from Webster Street. The project would include two on-street passenger loading spaces along Webster Street, a new sidewalk bulb-out/extension at the corner of Webster and Sacramento streets, new street trees, and four class 2 bicycle parking spaces.

The proposed building would be supported on a mat foundation, requiring excavation to a maximum of approximately 27 feet below the ground surface and the removal of approximately 5,830 cubic yards of soil. Construction is anticipated to begin in summer 2027 and take approximately 21 months. The project would utilize the Individually Requested State Density Bonus Program to qualify for a 26% density bonus (5 units). The project requires waivers from local height limit of 40 feet; reduction of the rear yard requirement; and reduction regarding the dwelling unit exposure requirement. In addition, Attachment A of the GPE provides figures showing the location of the project site, site and floor plans, elevations, and conceptual views of the proposed project.

Background

On May 3, 2022, Eduardo Sagues (project sponsor) filed an application with the planning department for a CEQA determination.

On October 23, 2023, the department issued a GPE certificate and initial study, based on the following determinations:

1. The proposed project is consistent with the development density established for the project site in the Housing Element 2022 Update EIR;
2. The proposed project would not result in effects on the environment that are peculiar to the project or the project site that were not identified as significant effects in the Housing Element 2022 Update EIR;
3. The proposed project would not result in potentially significant off-site or cumulative impacts that were not identified in the Housing Element 2022 Update EIR;
4. The proposed project would not result in significant effects, which, as a result of substantial new information that was not known at the time the Housing Element 2022 Update EIR was certified, would be more severe than were already analyzed and disclosed in the EIR; and
5. The project sponsor will undertake feasible mitigation measures specified in the Housing Element 2022 Update EIR that have been determined applicable to the project to mitigate project-related significant impacts.

The planning commission considered the project on Thursday, November 9, 2023. On that date, the planning commission adopted the GPE, including the project-specific Mitigation Monitoring and Reporting Program, and approved the Conditional Use Authorization for the project (planning commission resolution No. 21441), which constituted the approval action under Chapter 31 of the Administrative Code. The commission also made findings related to the requested waivers from development standards, including rear yard (planning code section 134); dwelling unit exposure (planning code section 140); and height (planning code section 260), pursuant to State Density Bonus Law.

On Monday, December 11, 2023, Richard Toshiyuki Drury of Lozeau Drury LLP, on behalf of Jonathan Clark (appellant), filed an appeal of the CPE determination.

On Tuesday, December 26, 2023, the appellant submitted supplemental information regarding a formal nomination submitted to the National Park Service's California State Historic Preservation Officer (SHPO) that the Health Sciences Library (City Landmark No. 115) is eligible to be placed on the National Register of Historic Places. (Note that a property may not be placed on the National Register without consent of the property owner.)

On Friday, January 12, 2024, the appellant supplemented his appeal. The Department is not able to address this submittal herein and will address the supplemental information prior to the appeal hearing.

CEQA, CEQA Guidelines, and San Francisco Administrative Code Chapter 31

General Plan Evaluations

As discussed in the Introduction above, CEQA section 21083.3 and CEQA Guidelines section 15183 *mandate* that projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified, *shall not* require additional environmental review unless there are project-specific effects that are peculiar to the project or its site and that were not disclosed as significant effects in the prior EIR. In evaluating disputes between parties concerning a project's eligibility for review under CEQA Guidelines section 15183, the courts have established that the applicable standard of review is the substantial evidence standard. An agency's finding that a project qualifies for an exemption pursuant to applies to a project will be upheld if substantial evidence supports the finding.[5]

Significant Environmental Effects

CEQA Guidelines section 15064(f) provides that the determination of whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA Guidelines 15604(f)(5) offers the following guidance: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion supported by facts."

San Francisco Administrative Code

Section 31.16(e)(3) of the San Francisco Administrative Code states: "The grounds for appeal of an exemption determination shall be limited to whether the project conforms to the requirements of CEQA for an exemption."

Administrative code section 31.16(b)(6) provides that, in reviewing an appeal of a CEQA decision, the board of supervisors "shall conduct its own independent review of whether the CEQA decision adequately complies with the requirements of CEQA. The Board shall consider anew all facts, evidence and issues related to the adequacy, accuracy and objectiveness of the CEQA decision, including, but not limited to, the sufficiency of the CEQA decision and the correctness of its conclusions."

[5] *Lucas v. City of Pomona,* 92 Cal.App.5th 508 (2023).

Planning Department Responses

The concerns raised in the appeal letter and supplemental appeal information are addressed in the responses below.

Response 1: The Housing Element 2022 Update EIR adequately analyzed the environmental impacts of housing production in San Francisco pursuant to the Housing Element 2022 Update, including as a result of this project. The department properly determined that the project qualifies for streamlined review in the form of a General Plan Evaluation (GPE) under CEQA section 21083.3 and CEQA Guidelines section 15183.

Housing Element Programmatic EIR

The Housing Element 2022 Update EIR (HE EIR or EIR), certified by the San Francisco Planning Commission on November 17, 2022, is a programmatic EIR (PEIR) that comprehensively evaluates the impacts on the environment that could result from adoption and implementation of the Housing Element 2022 Update (Housing Element). The Housing Element sets forth the goals, policies, and actions to address the existing and projected housing needs of San Francisco, with a focus on racial and social equity. To analyze the physical environmental effects of implementing the Housing Element, the EIR analysis is based on assumptions regarding where new housing units could be built. While the impact analysis in the EIR is based on these projected future conditions, the depictions are not intended to be precise maps of where future development would occur. The HE EIR acknowledges that *future housing development could occur in any areas of the city where zoning allows*.

Housing Element Appendix B, the Sites Inventory, states that housing capacity assumptions for residentially zoned parcels reflect recent increased use of State Density Bonus law, which has been used by a majority of recent multifamily housing developments in San Francisco that are providing on-site units affordable at low or moderate incomes. In addition, the EIR identified that state density bonus programs may be used in the future, as applicable, to implement the future development under the Housing Element (EIR p. 3-8).

Environmental Review of Subsequent Projects

The Housing Element Update EIR assumes future development consistent with the Housing Element update would predominately consist of residential projects, some with ground floor neighborhood services (e.g., retail or small medical offices) and could include buildings with heights ranging from 55 to 300 feet high (subsequent projects) in San Francisco. The EIR explains that subsequent residential or residential mixed-use projects would be subject to screening for the applicability of environmental review at such time that those projects are proposed. In addition, pursuant to department procedures the projects would be screened to determine whether or not they could result in physical environmental effects such that analysis and/or mitigation measures are applicable. The EIR explains as well that analysis of subsequent projects would be based on existing conditions at the site and vicinity, at such time a project is proposed, and would take into account any updated information relevant to the environmental analysis of the subsequent project (e.g., changes to the environmental setting).

The Housing Element EIR specifically states the department's intention to use CEQA Guidelines Section 15183 to streamline subsequent project-level review, as follows:

> Likewise, CEQA Section 21155.10, and other provisions of the CEQA Guidelines, including **sections 15183** and 15183.3 provide for streamlined review of certain projects that are consistent with the development density established by general plan policies for which an EIR was certified. **Accordingly, this EIR will streamline the CEQA environmental review process for future activities** that are consistent with and that would implement the policies of the updated housing element following its adoption. Such activities could include both legislation to enact changes in zoning and other land use regulations (e.g., the designation of housing sustainability districts) and approval **actions for individual development projects**.[6] [Emphasis added.]

As stated in the project background above, the applicant filed an application with the planning department for a CEQA determination on May 3, 2022. The department determined that the project is a project for the purpose of CEQA and considered whether or not the project qualified for a categorical exemption. The department determined that the project did not qualify for a categorical exemption, and the department correctly followed the steps outlined under CEQA section 21083.3 and CEQA Guidelines sections 15168(c)(2) and 15183 regarding the potential to streamline CEQA review for this housing project.

The GPE is functionally equivalent to the hundreds of Community Plan Evaluations (CPEs) that have been prepared by the department for more than 15 years for projects within area plans. The GPE was prepared under the Housing Element 2022 Update EIR pursuant to CEQA section 21083.3 and CEQA Guidelines section 15183, whereas CPEs were prepared under area plan EIRs (e.g., Central SoMa EIR) permitted under the same CEQA and CEQA Guidelines sections provisions.

Project Consistency with the Housing Element 2022 Update EIR

The appellant incorrectly asserts that the project is inconsistent with the Housing Element 2022 Update EIR because the proposed building is taller than 40 feet, which is the height limit assumed for the project site in the EIR. This assertion is incorrect as explained below.

The proposed project at 2395 Sacramento Street is consistent with development density permitted for the project site in combination with the use of Individually Requested State Density Program. The project site is in the RM-1 Residential-Mixed, Low Density Zoning District and in the 40-X Height & Bulk District. The RM-1 Zoning District regulates residential density as a ratio of units to area. The base density includes the amount of residential development that could occur on the project site as of right without modifications to the physical aspects of the Planning Code (e.g., open space, dwelling unit exposure, etc.). Section 209.2 of the Planning Code permits a residential density of up to one dwelling unit for each 800 square feet of lot area. The project site is 15,105 square feet in size, which allows for up to 19 principally permitted dwelling units.

The project would utilize the Individually Requested State Density Bonus Program, electing to provide 14.5% (3 units) of the base 19-unit project as affordable at Low Income (80% Area Median Income or AMI) in order to qualify for a 26% density bonus (5 units).

[6] San Francisco Planning Department, San Francisco Housing Element 2022 Update EIR, Volume I, p. 2-10, Record No. 2019-016230ENV and State Clearing House no. 2021060358. Available at https://sfplanning.org/environmentalreview-documents?title=Housing+Element&field_environmental_review_categ_target_id=212&items_per_page=10.

The existing building is 67'-10" tall. The proposed height of the southern addition has a height of 68' – 1" and the proposed height of the eastern addition has a height of 77'-6". Therefore, the project requested a waiver of this Planning Code requirement per State Density Bonus Law. The waiver of the height limit is necessary to enable the construction of the project with the increased density provided by Government Code Section 65915(f)(1), Density Bonus Law. Modifications and waivers of development standards, as required under the Density Bonus Law, do not mean that a project is not consistent with existing zoning – the development standards applicable to the site allow for the application of State Density Bonus Law and a finding of plan consistency.[7]

The project complies with all relevant requirements and standards of the Planning Code and is consistent with objectives and policies of the General Plan. There is no height limit under the Individually Requested State Density Bonus Program. For RM-1 zoning, the dwelling unit density is controlled by lot area. Therefore, the area of the project site is the controlling factor for the number of units permitted, not the height limit at the site. On November 9, 2023, the Planning Commission approved the Conditional Use request to exceed the 40-foot- height limit of RM-1 zoning, per Motion No. 21141. Therefore, the proposed height of the project is permitted under Planning Code Section 303. Furthermore, the Planning Commission approved the height waiver, along with the waivers for open space and rear yard. Therefore, the project is fully code compliant. The appellant has not appealed the Conditional Use Authorization.

Projects that qualify for streamlining under section 15183 *shall not* be subject to additional environmental review, except as might be necessary to examine whether there are peculiar *significant* effects. To qualify, projects must be consistent with the *development density* established by existing zoning, community plan, or general plan policies for which an EIR was certified. "Consistent" in this context is narrowly defined to mean consistent with the development density in the plan, not the building height assumed for the project site in the EIR, as incorrectly suggested by the appellant.

While not relevant to this appeal, for informational purposes, it should also be noted that the consistency of the proposed project with those General Plan policies that do not relate to physical environmental effects were considered by the Planning Commission as part of its determination of whether to approve, modify, or disapprove the project.

The appellant consistently and improperly cites CEQA Guidelines section 15168 provisions pertaining to program EIRs in arguing why the department's issuance of a GPE is improper. The department has not utilized Section 15168 in issuing the GPE; therefore, the provisions of this pathway do not apply in this case.

Project-specific Environmental Analysis

For the GPE initial study, the department analyzed whether the project would result in any significant impacts not identified in the programmatic EIR that are either peculiar to the project site or project or are due to substantial new information. As a threshold matter, the department follows the same technical

[7] *Wollmer v. City of Berkeley*, 193 Cal.App.4th 1329 (2011). This case clarified the use of the CEQA infill exemption for density bonus projects. In this case, an opponent of a Berkeley density bonus project challenged the City's use of the urban infill exemption on the grounds that the City's modifications and waivers of development standards, as required under the Density Bonus Law, meant that the project was not consistent with existing zoning. The California First District Court of Appeal rejected that argument, finding that the modifications required by the Density Bonus Law did not disqualify the project from claiming the exemption.

analysis procedures regardless of whether the project qualifies for a GPE or some other environmental document. As a result, the mitigation measures identified for the project in the GPE initial study to reduce environmental impacts to less than significant are the same as those that would have resulted if the department had reviewed the project without a GPE. For each topic area, the department follows the same evaluation procedures and applies the same screening, analysis methodologies, and significance thresholds regardless of the type of environmental document prepared. For projects whose significant impacts may be mitigated to a less than significant level, the outcome of the environmental analysis (in terms of measures applied to the project to provide environmental protection) is the same under a GPE as it would have been if a mitigated negative declaration were issued.

The appellant asserts that the department provided no project-specific analysis for the project. This inaccurate claim is defeated by the fact that the GPE provides 35 pages of project-level analysis and cites multiple technical reports, including a Historic Resource Evaluation and two Department historic resource evaluation responses, Transportation Study Determination, Air Quality Screening, Preliminary Shadow Fan Study, Qualitative Wind Assessment, and Preliminary Archeological Review Memo. The GPE together with these studies provide project-level analysis constituting substantial evidence that a GPE is appropriate.

The GPE initial study found that the proposed project could result in significant impacts to air quality, cultural resources, and noise. These significant impacts were found to be less than significant with application of mitigation measures identified in the Housing Element 2022 Update EIR. All other environmental impacts from the project were found to be less than significant based upon project-specific analyses. See response 2 below for more information regarding the technical analyses conducted for the project.

Applicable Housing Element 2022 Update EIR Mitigation Measures Applied to the Project

The appellant incorrectly asserts that no exemptions (including GPEs) can be issued when mitigation is required. That is correct for categorical exemptions listed in Article 19 (CEQA Guidelines sections 15300 to 15333) but not for general plan evaluations. The department was required by section 21083.3 to impose all applicable mitigation measures from the Housing Element 2022 Update EIR on the project. Contrary to the appellant's claim, the historic resource mitigation imposed on the project is adequate and clear; the appellant does not substantiate their incorrect statement with substantial evidence.[8] Further, the department did not improperly defer mitigation or analysis. The department assessed the historic resource impacts based on the status of the subject building as a historic resource. Mitigation measures are enforceable and tied to the issuance of the building permit, construction documents, and final certificate of occupancy. The appellant is incorrect, citing CEQA section 21084(e), that CEQA prohibits the use of exemptions (including GPEs) when there is a fair argument that project may have adverse impacts to an historic resource. Section 21084(e) applies to categorical exemptions and not to GPEs.

CEQA allows analysis of a specific housing project to use mitigation measures identified in the HE EIR to reduce an impact to less than significant. The appellant mischaracterizes the streamlined process allowed by CEQA section 21083.3 and 15183 and relies on *Communities for a Better Environment v. Cal. Resources Agency* (2002) 103 Cal.App.4th 98, 122-125, that "when a 'first tier' EIR identifies a significant, unavoidable

[8] The adequacy and appropriateness of the historic mitigation measures applied to the project is discussed under the Historic Resources in Response 2 below.

environmental impact, then the agency must prepare second tier EIRs for later phases of the project to ensure that those unmitigated impacts are 'mitigated or avoided.'" The appellant's reliance on the case is misplaced. CEQA section 21083.3 (c) specifies that public agencies with authority to mitigate significant effects shall undertake or require the undertaking of any feasible mitigation measures specified in the prior EIR to a significant effect on the environmental which the project will have. Such previously disclosed impacts and mitigation measures are not peculiar to the project and do not require preparation of a mitigated negative declaration or EIR.

The conclusions of the GPE initial study with respect to significant environmental impacts that can be mitigated to a less than significant level would not change had environmental review been conducted under an initial study process that concluded with issuance of a mitigated negative declaration. A difference occurs when the project would result in a significant and unavoidable project-specific impact. In that case, the question to address is whether or not the EIR identified the significant and unavoidable impact and whether the project would result in a significant and unavoidable impact that is more severe than identified in the EIR. That was not the case for this project where all significant environmental impacts that were identified were previously identified as significant effects in the Housing Element 2022 Update EIR and are able to be mitigated to less than significant.

Conclusion

The proposed project, with the implementation of mitigation measures, would not result in effects on the environment that are peculiar to the project or the project site that were not identified as significant effects in the Housing Element 2022 Update EIR. Therefore, a GPE is the appropriate CEQA document for this project.

Response 2: The department conducted project-specific built environment historic resource impact analysis based on the scope and location of the project. The GPE's conclusion that the project would not result in any peculiar significant built environment historic resource impacts not identified in the HE EIR is supported by substantial evidence.

The EIR found that future development under the Housing Element would result in significant and unavoidable impacts with mitigation to built-environment historic resources. For the 2395 Sacramento Street Project, project-specific analysis was conducted and is described below.

The department appropriately analyzed impacts to historic resources and identified applicable HE EIR mitigation measures for implementation by the project.

As noted above, the department prepared all appropriate historical resource technical analyses necessary to evaluate project impacts relative to impacts identified in the HE EIR in conformance with CEQA, including a Historical Resource Evaluation and Historic Resource Evaluation Responses Part 1 (HRER) and Part 2 (HRER 2), provided as Attachments A and B to this response.[9] The project site contains one building listed as a local resource: 2935 Sacramento Street, City Landmark No. 115. However, the Article 10 Landmark Designation

[9] Two main steps are involved in the process when evaluating potential impacts: 1) Preparation of a Historical Resource Evaluation Response Part 1 to determine whether or not the property is a "historical resource". 2) And if a historic resource is present, preparation of Historic Resource Evaluation Response, Part 2 to determine whether the proposed changes to the property would cause a "substantial adverse change in the significance of a historical resource."

Ordinance for 2395 Sacramento Street was limited to the exterior of the subject property and the interior of the building was not evaluated. Portions of the library were publicly accessible and therefore, for the purposes of CEQA, the proposed interior alterations of the building were subject to review by the Department's Historic Preservation staff. Through the HRER, the department appropriately determined that 2395 Sacramento Street, both exterior and portions of the interior, is a historic resource for the purposes of CEQA. The HRER 2 appropriately analyzed the project's significant historic resource impacts and identified feasible mitigation measures to reduce the impacts to less than significant.

According to the Secretary of the Interior's Standards for the Treatment of Historic Properties, rehabilitation is the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values.[10] The subject building at 2395 Sacramento Street is significant under Criteria 1 (events), 2 (people) and 3 (architecture) and includes character-defining features at the interior and exterior of the building.[11] Therefore, when evaluating the proposed project at 2395 Sacramento Street, the department considered potential impacts to the building as a whole, evaluating impacts to setting, interior and exterior finishes, volumes, massing, features, and details.

The department appropriately analyzed impacts to the interior and exterior of this detached monumental building. The exterior features classically inspired proportions and features on three of its four elevations (north, south, and west) with the fourth elevation (east) lacking any notable features or ornamentation. Upon review of the project, Planning Department preservation staff (the department) found that the proposal to convert the former library building into residential use would generally retain significant exterior historic features and finishes, the overall massing, form, and volume of the historic building as viewed from the street. While some exterior alterations or selective removal would occur at portions of the exterior, the new work would not significantly materially impair the physical characteristics of the building that convey its historical significance, specifically, the historic institutional use of the subject building and its architectural features. This is because most exterior features associated with Beaux-Arts style and institutional use of the subject building would remain. The proposal would rehabilitate the property while retaining the monumental form and siting of the historic building and preserving its materials, ornamentation, and features on the exterior of the building such to the extent that it will continue to convey its historic use as an institutional building.

The project also includes construction of two additions at the eastern and southern elevations of the historic property. The eastern addition would generally be perceived as an independent building within a mixed-height, mixed-use urban setting. Proposed work at the southern elevation of the subject building includes selective removal of the exterior wall and features to accommodate a four-story tall, 15-foot-long glass hyphen setback approximately 45 feet from the front property line. The separation of the residential addition from the historic building would also reduce visual impacts to the former library's monumental siting. Similarly, the setback of the hyphen and separation of the southern addition would generally maintain the visibility of the southern elevation of 2395 Sacramento Street and reduce visual impacts to the historic building. Therefore, although the department determined that proposed materials of the additions are not fully compatible, ultimately the department found that the thoughtful siting of the additions would allow the

[10] U.S Department of the Interior National Park Service. (2017). The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing HIstoric Buildings. Washington, D.C.: Technical Preservation Services

[11] Historic Resource Evaluation Response, Part 1: 2395 Sacramento Street (dated November 8, 2022; updated August 18, 2023).

historic building to retain the overall historic massing and stature as a prominent corner Beaux-Arts style building.

As documented in the HRER Part 1 and Part 2, the Article 10 Landmark Designation Ordinance for 2395 Sacramento Street was limited to the exterior of the subject property and did not formally designate the interior through the city landmark designation process. However, because portions of the former library interiors are, and have historically been, publicly accessible, for the purposes of CEQA, the interiors were subject to historic resource analysis to determine historic significance and potential impacts as a result of the project. As part of this review, the department concluded that portions of the building's interior contributed to the historic resource and therefore analyzed potential impacts.[12] As documented in the department's analysis:

> *…at the interior, the new use will result in the substantial loss and removal of significant features, finishes, materials, and spaces that relate to the building's historic use, including full removal of the four-story library stacks, along with bookshelves, chandeliers, and murals in the Reading Room. Insertion of new residential units, including floors and partitions, will also irreversibly break-up the double-height volume of the Reading Room and interconnected volume of the library stacks.*

The department correctly concluded that although the project will substantially retain the form, massing, siting, materials, façade ornamentation, and finishes of the historic building's exterior, that the loss of most interior features would result in a substantial adverse change in the significance of the historic resource. It is worth noting that when considering *only* impacts to the exterior of the building as an Article 10 City Landmark, the Historic Preservation Commission (HPC) unanimously approved a Certificate of Appropriateness finding that the project on balance conformed with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Ultimately, the department and HPC concluded that when viewed from the street, the proposed project will not result in a loss of integrity such that it will no longer convey its significance as a historic library building. However, for CEQA analysis, the department evaluated both exterior *and* interior features. Therefore, the department considered the cumulative loss of materials, particularly at the interior, would result in a significant impact that could be mitigated to a less-than-significant level. The significant impact is consistent with that disclosed in the Housing Element 2022 Update EIR Cultural Resources section, See HE EIR pp. 4.2-81 to 4.2-100, in which Impact CR-1 identified a significant and unavoidable with mitigation impact to historic resources.

As documented in the GPE, HRER Part 2 and project-specific MMRP, the adverse impacts of the project can be reduced to a less-than-significant level through the implementation of the following mitigation measures identified in the HE EIR , adapted for the project-specific MMRP:

- *Mitigation Measure M-CR-1a: Avoid or Minimize Effects on Identified Built Environment Resources*
- *Mitigation Measure M-CR-1b: Best Practices and Construction Monitoring Program for Historic Resources*
- *Mitigation Measure M-CR-1d: Documentation*
- *Mitigation Measure M-CR-1f: Salvage Plan*

[12] The Planning Department determined that portions of the former library interiors to be significant as detailed in the Historic Resource Evaluation Response, Part 1: 2395 Sacramento Street (dated November 8, 2022; updated August 18, 2023).

- *Mitigation Measure M-CR-1g: Interpretation*

Contrary to appellant's assertion that application of mitigation measures is improper in a GPE, CEQA section 21083.3(c) mandates that agencies "undertake or require the undertaking of any feasible mitigation measures specified in the prior environmental impact report relevant to a significant effect which the project will have on the environment." Further, contrary to the appellant's claim, the historic resource mitigation imposed on the project is adequate and clear. As discussed on pages 5-6 of the HRER Part 2 (Attachment B), these mitigations measures would:

> *…reduce material impairment of historic resources through means of the following measures: historical documentation of the resource which will record and provide architectural context for all removed and altered character-defining features, salvage of removed character-defining features, and public interpretation of building's historical and architectural significance. Together, these measures document, salvage, and present to the public, removed or altered character-defining features, spaces, and special relationships, and provides context and highlights those features remaining, which assists in retaining the overall historical significance of the resource. Additionally, measures requiring protection and monitoring of character-defining features during project construction activities will help to ensure that these features are retained and appropriately treated.*

While portions of the interior of the building would be removed, the loss, alteration, or demolition of features must be considered in relation to the whole of the resource. The appellant asserts that individual elements or character-defining features associated with the historic property, specifically the murals, are standalone historic resources. The murals, like the chandeliers, windows, and entry staircase, are contributing elements, or character-defining features of the subject property. Generally speaking, character-defining features are the elements, materials, spaces, and finishes that contribute to the overall visual character of a building as a historic resource. However, the murals are not individually significant objects but instead a character-defining feature that contributes to the whole of the project. In fact, the appellant's supplemental National Register nomination also identifies the murals as a character-defining features of the building's interior and does not assert that the murals are independently significant objects of their own right. It is also worth noting that the appellant mischaracterizes the intended treatment of the murals, noting that they will be "destroyed." In fact, the murals will be removed by a qualified art conservator and correctly stored.[13] In accordance with standard practices and the Housing Element 2022 Update EIR, the department finds that mitigation measure for salvage *in combination with* mitigation measures for documentation and interpretation will reduce the overall impacts of the project to less than significant with mitigation.

The project would not result in any peculiar significant historical resources impacts that were not identified in the Housing Element EIR.

The appellant asserts that the project's impact to the Health Sciences Library is a peculiar impact not analyzed in the HE EIR. This assertion is incorrect because, under Impact CR-1, the HE EIR concluded that future housing development could result in significant and unavoidable impacts to built-environment

[13] Memoranda: 2395 Sacramento Street Murals Removal, from Page & Turnbull to Reuben Junius & Rose, LLP, dated June 23, 2023. https://citypln-m-extnl.sfgov.org/External/link.ashx?Action=Download&ObjectVersion=-1&vault={A4A7DACD-B0DC-4322-BD29-F6F07103C6E0}&objectGUID={1285CB09-367E-4D58-858C-A030BE02F1DE}&fileGUID={59F3C751-A5C3-4104-A43D-123F6BAED9C8}

architectural historic resources. In addition, HE EIR Table 4.2-8 identified the magnitude of the impact would increase compared to the 2050 environmental baseline for the Pacific Heights and Japantown neighborhoods. This programmatic impact is very similar to the impact of the proposed project. The court in *Lucas v. City of Pomona* explained that "peculiar" impacts in the context of CEQA Guidelines section 15183 are "dissimilar" effects. Therefore, the GPE accurately concluded that the project's significant and unavoidable impact to a built-environment architectural historic resource was not peculiar.

The historic resource impact analysis approach for the project and impact conclusion in the GPE would have been the same even if the property were considered a historic resource due to listing on the National Register of Historic Places. CEQA does not establish different impact analysis approaches based on the type of historic resource eligibility, be it local, state, or national. As 2395 Sacramento Street is a locally listed historic landmark, and therefore an identified historic resource, the same CEQA analysis is required as would be the case if it were listed on the national register. Furthermore, the information and findings offered in the National Register nomination form is consistent with Department records, including the Landmark Nomination Form[14], the Historic Resource Evaluation[15], and the Historic Resource Evaluation, Part 1 (Attachment A). Therefore, the appellant is incorrect in the assertion that the recent nomination of the library for the National Register of Historic Places is new information showing project historic impacts would be more severe than previously disclosed.

As described above, the department conducted project-specific built environment historic resource impact analysis based on the scope and location of the project. The historic resource analysis concluded that the project would not result in any peculiar built environment historic resource impacts not identified in the HE EIR. This conclusion is based on substantial evidence.

The exception to categorical exemptions for impacts to historic resources does not apply to GPEs.

The appellant asserts that the exception to categorical exemptions for historic resources impacts applies to this project. The appellant is mistaken, because the appellant confuses GPEs, a type of statutory exemption under CEQA Guidelines section 15183, with categorical exemptions, which are listed under CEQA Guidelines Section 15300 through 15333. A GPE is entirely distinct from a categorical exemption, and CEQA provisions regarding the latter are irrelevant in this case. The exceptions to the exemptions apply to categorical exemptions, not statutory ones.

Response 3: The department conducted project-specific vibration analysis based on the scope and location of the project. The GPE's conclusion that the project would not result in any peculiar significant vibration impacts not identified in the HE EIR is supported by substantial evidence.

The HE EIR found that future development under the Housing Element would result in structural damage from construction vibration but that this impact would be reduced to less than significant with mitigation.

[14] Landmarks Preservation Advisory Board, "Landmark No. 115: Health Science Library, 2395 Sacramento Street" (January 6, 1979). https://sfplanninggis.org/docs/landmarks_and_districts/LM115.pdf

[15] *Historic Resource Evaluation: 2395 Sacramento Street San Francisco, CA 94123*, Richard Brandi, August 18, 2022. Available at: https://citypln-m-extnl.sfgov.org/External/link.ashx?Action=Download&ObjectVersion=-1&vault={A4A7DACD-B0DC-4322-BD29-F6F07103C6E0}&objectGUID={1285CB09-367E-4D58-858C-A030BE02F1DE}&fileGUID={59F3C751-A5C3-4104-A43D-123F6BAED9C8}

Project-specific vibration analysis was conducted for the 2395 Sacramento Street Project and is described below.

On pp. 15-16 of the GPE initial study, the department determined the project's construction equipment-related vibration levels could exceed the damage thresholds for older/historic buildings and older residential structures, resulting in a significant impact. Vibration from construction of future development consistent with the housing element update could result in building damage is the same significant impact identified in the HE EIR (pages 4.5.56). The HE EIR mitigation measure adapted for the project's significant impact, Project mitigation measure 5 (HE EIR mitigation measure M-NO-3a) would require that a pre-construction survey and vibration management and monitoring plan of existing historic buildings at 2018 Webster Street, 2329 Sacramento Street, and of the project site is submitted to the Environmental Review Office for approval. This measure is adequate and is appropriately analyzed in the HE EIR and GPE documents. Contrary to the appellant's assertion, the GPE and the HE EIR identified the HE mitigation measure M-NO-3a is applicable to the proposed project. Pursuant to the mitigation measure, the contractor is required to submit a pre-construction survey and vibration management and monitoring plan to the Planning Department prior to construction. The plan must identify feasible ways to mitigate damage to adjacent structures from project construction vibration. The department will monitor and enforce the implementation of all the mitigation measures in the MMRP, including Project mitigation measure 5 (HE EIR mitigation measure M-NO-3a). For these reasons, the department's determination that the project's significant vibration impacts on adjacent structures, including historic structures, would be mitigated to a less than significant level is supported by substantial evidence. The appellant has not demonstrated otherwise.

The GPE Initial Study correctly concluded that there are no project- or site-specific conditions that would result in peculiar noise and vibration impacts that were not identified in the Housing Element 2022 Update EIR. The HE EIR identified a significant vibration impact resulting from new developments constructed near adjacent historic resources; the presence of historic resources at 2018 Webster Street and 2329 Sacramento Street adjacent to the site is not a peculiar or unforeseen circumstance. Construction activities occur routinely in the City adjacent to historic resources and are subject to similar vibration mitigation measures as the project. The appellant has not provided evidence that the GPE Initial Study did not consider the vibration impacts on the buildings at 2018 Webster Street and 2329 Sacramento Street, nor has the appellant demonstrated that the conclusions in the GPE concerning vibration impacts on adjacent historic resources are not supported by substantial evidence.

Response 4: The department conducted project-specific air quality analysis based on the scope and location of the project. The GPE's conclusion that the project would not result in any peculiar significant air quality health risk impacts not identified in the HE EIR is supported by substantial evidence.

The HE EIR found that the air quality health-risk impacts of future development under the Housing Element would be considered significant and unavoidable with mitigation. Project-specific analysis for the 2395 Sacramento Street project was conducted and is described below.

The EIR analyzed construction and operational air quality impacts that would result from a range of representative building types (from an accessory dwelling unit to a 500-foot-tall building). The department

screened the proposed project's characteristics and compared them to the characteristics of the representative building types analyzed in the HE EIR (cited in footnote 23 in the GPE). In addition, the department's air quality analysis for the project considered the proximity of sensitive receptors and existing health risks modeled in the citywide health risk assessment.[16] The screening level analysis found that the proposed project could result in a significant health risk impact. Project mitigation measure 6 (HE EIR mitigation measure M-AQ-3) would require that the project use clean construction equipment meeting tier 4 standards and prepare a construction minimization plan described in more detail below to demonstrate that emissions would be reduced such that this impact would be reduced to a less than significant level.[17]

Contrary to the appellant's assertion, the effectiveness of the mitigation measure is documented in the HE EIR analysis. For technical reference, the Housing Element 2022 Update EIR's Appendix I.3 Air Quality and Health Risk Assessment Results for Building Types, demonstrates the difference between the controlled cancer risk and PM2.5 concentrations, which are substantially lower than the uncontrolled cancer risk and PM2.5 concentrations. Controlled refers to the emissions scenario with mitigation applied. Implementation of construction air quality mitigation measures would reduce diesel particulate matter exhaust from construction equipment by 89 to 94 percent compared to uncontrolled equipment.[18,19,20]

Further, as detailed on page 18 of the GPE and in the project's Mitigation Monitoring and Reporting Program (Attachment B to the GPE), the proposed project would implement construction air quality mitigation measures during all construction activities. These measures include the requirement for the use of higher tier engines in construction equipment to reduce emissions, as well as restrictions on construction equipment idling. In addition, the project sponsor would be required to prepare a site-specific Construction Emissions Minimization Plan (the plan) to state how the project would comply with the requirements of the mitigation measure. The department would review the plan for approval prior to the start of construction. In addition, the project sponsor or their contractor would subsequently submit quarterly reports to the Environmental Review Officer to document compliance with the plan. Thus, with the implementation of construction air quality mitigation measure, the project would have a less than significant construction air quality impact. There are no aspects of the project that would result in peculiar health risk air quality impacts that were not identified in the Housing Element 2022 Update EIR. No further air quality analysis is required. The appellant has not demonstrated that the conclusions in the GPE concerning air quality are not supported by substantial evidence.

[16] San Francisco Department of Public Health and San Francisco Planning Department, San Francisco Citywide Health Risk Assessment: Technical Support Documentation, September 2020.

[17] San Francisco Planning Department, Air Quality Screening, Record No. 2022-004172 ENV 2395 Sacramento St., June 27, 2023.

[18] San Francisco Planning Department, Environmental Planning, Appendix I.3 Air Quality and Health Risk Assessment Results for Building Types to the Housing Element 2022 Update EIR, Record No. 2019-016230ENV, April 2022. Figure 1 shows the maximum uncontrolled cancer risk by distance; this illustrates that the cancer risk peaks near the construction boundary and declines with increasing distance. Figure 2 shows the maximum controlled risk by distance.

[19] United States Environmental Protection Agency, "Clean Air Nonroad Diesel Rule: Fact Sheet," May 20, 2004.

[20] PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 1 and Tier 2 with Tier 4 final emissions standards. Tier 1 PM emissions standards were established for equipment with 25- <50 horsepower and equipment with horsepower <175. Tier 1 emissions standards for these engines were compared against Tier 4 final emissions standards, resulting in a 96 percent reduction in PM. The EPA established PM standards for engines with horsepower between 50-<175 as part of the Tier 2 emission standards. For these engines Tier 2 emissions standards were compared against Tier 4 final emissions standards, resulting in between 93-95 percent reduction in PM.

Response 5: The department conducted project-specific wind analysis based on the scope and location of the project. The GPE's conclusion that the project would not result in any peculiar significant wind impacts not identified in the HE EIR is supported by substantial evidence.

The HE EIR found that future development under the Housing Element would result in significant and unavoidable with mitigation wind impacts. However, as stated in the HE EIR:

> "Based on the department's professional experience, consultation with qualified wind impact technical specialists, and a review of wind analyses conducted for projects throughout the city, the department has determined that buildings of less than 85 feet in height have no potential to create wind hazard impacts in San Francisco." (p. 4.7-8 p. 4.7-11)

The department's methodology and threshold for determining a significant wind impact under CEQA is based on a multi-year history of compiled technical data collected from department-reviewed projects conducted by department-qualified industry experts supported by substantial evidence.

Based upon the scope of the project, which proposes buildings that would be below 85 feet in height, a technical wind study was not required for the project. However, the project sponsor independently contracted with CPP, Inc.[21] to prepare a qualitative assessment of pedestrian wind conditions on and around the 2395 Sacramento Street project site (See Attachment C to this response). The initial assessment was further supplemented by CPP, Inc. in October 2023 (See Attachment D to this response). The wind assessment studies found the project would not cause hazardous wind impacts. The department reviewed the studies and concurred with the findings. Further, staff concurs with the basis for the findings which takes into consideration the height and geometry of the proposed project, the heights and geometries of surrounding buildings, the orientation of the proposed project relative to the prevailing winds, and the role of topography. The reports correctly rely on the weather data included in the San Francisco Wind Climatology Study, which was derived from a detailed Weather Research Forecasting (WRF) model. The WRF model relied on data collected from the San Francisco and Oakland International Airports during a 20-year period from 2000 – 2019.[22] The GPE concludes that the project would not result in any peculiar significant wind impact not identified in the HE EIR.

The appellant contends that the project would result in peculiar wind impacts that were not addressed in the EIR based on a wind computational fluid dynamics (CFD) assessment prepared by the appellant's consultant (Exhibit C to the appellant's December 8, 2023 letter). Department staff reviewed Exhibit C and has the following comments:

(1) *Exhibit C is Incomplete.* While Exhibit C is illustrative, it lacks basic components required in a scientific report, including the name, contact information and signature of the preparer(s), the purpose of the report, methodological details, a statement of limitations, and citations to data sources. Assuming that the images in Exhibit C *were* generated by a CFD model, without the information noted, Planning Department staff cannot validate the model or results.

[21] CPP, Inc. is a wind engineering consulting firm that regularly conducts wind tunnel testing and qualitative assessments for land use development projects in San Francisco. CPP staff peer reviewed the draft San Francisco Wind Climatology Study and employs the weather data contained therein in wind tunnel tests and qualitative analyses, as required by the Department.

[22] Rowan Williams Davies and Irwin, Inc., *San Francisco Wind Climatology Study*. August 28, 2023.

(2) *Computational Fluid Dynamics (CFD) Analysis Yields Qualitative Results.* Planning Department staff has and continues to work with wind consultants to explore uses for CFD analysis for wind impact analysis in San Francisco. Department staff has undertaken an extensive literature review of wind guidelines and CFD analysis reports for cities worldwide. This review has not provided an example of a CFD analysis that yields precise wind speeds. CFD is considered a valuable qualitative tool that is complementary to wind tunnel testing. For example, CFD can be used to identify areas that may experience higher wind speeds with the addition of a proposed development project. If hazard exceedances are expected, CFD analysis can guide the placement of sensor locations in the wind tunnel to focus on the areas of expected exceedances. CFD analysis may also be used as a qualitative screening tool to screen out projects with no potential to result in wind hazards from further review and may also be the basis for recommending wind-reducing features if quantitative proof of efficacy is not required.

(3) *Weather Data*. Wind is weather. As such, weather data is the most important consideration for wind analysis and the key model input for wind tunnel tests and CFD simulations. All wind studies in San Francisco are required to rely on the most complete, comprehensive and up-to-date weather data found in the San Francisco Wind Climatology Study.[23]

In conclusion, the department does not find Exhibit C to be valid source of information on the wind effects of the proposed project since it is incomplete, unverifiable, and purports to extract quantitative results from a CFD analysis, which is not capable of generating such outputs.

The department's conclusion that the project would result in a less-than-significant wind impact is based on substantial evidence. Even if a significant wind impact were identified, the HE EIR identified a significant wind impact with mitigation so the impact would not be peculiar to the project or the project site.

Response 6: The department conducted project-specific shadow analysis based on the scope and location of the project. The GPE's conclusion that the project would not result in any peculiar significant shadow impacts not identified in the HE EIR is based on substantial evidence.

The HE EIR found that future development under the Housing Element would result in a shadow impact that is significant and unavoidable with mitigation. Project-specific analysis was conducted for the 2395 Sacramento Street project and is described below.

In San Francisco, the environmental review of projects includes, if applicable, an analysis of whether new shadow from a proposed project would affect the use and enjoyment of parks or open spaces that are publicly accessible. The department considered the physical environmental impacts of constructing an approximate 68-foot-tall addition along Webster Street and an approximate 78-foot-tall addition along Sacramento Street to the existing building at the site. The department prepared a shadow fan for the proposed project (See Attachment E), which demonstrates that the proposed project would not shade any Recreation and Park Commission property nor any publicly accessible open space in a manner that would adversely affect the public's use and enjoyment of such open space. Therefore, the GPE correctly concludes that the project would result in a less-than-significant shadow impact.

[23] The San Francisco Wind Climatology Study is accessible on the Planning Department's website. https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=ddab5c28e9839adfa59326a7a98e674dfbd96ac4f8e43c62ea845b9a8a3a2d8c&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0

The appellant contends that the project would result in peculiar shadow impacts on the adjacent historic resources, including the Medical Sciences Library and Congregation Sherith Israel buildings. Shadow on the referenced historic attributes of private buildings is not a significant shadow impact under CEQA. Further, the character-defining features of the Medical Sciences Building do not include light entering into the building, nor does the appellant include light entering into the subject building as a character-defining feature in the supplemental National Register nomination form.[24] As for the Congregation Sherith Israel, a 1968 Survey (Here Today) identified the building as an eligible historic property but did not include a formal list of character-defining features for the property.[25] Furthermore, based on a visual examination of Sherith Israel, windows that face the subject building and interior of the lot are generally fewer and smaller than those at the street elevations. As stated above, the project was reviewed appropriately under CEQA Guidelines Section 15183 and no further shadow analysis required. Further, even if the project had any shadow impacts, they would not be considered peculiar. The HE EIR shadow analysis discloses the range of shadow impacts that could occur across the city with implementation of the housing element update. The appellant has not demonstrated that the department's conclusions are not supported by substantial evidence.

Response 7: The department conducted project-specific pedestrian safety analysis based on the scope and location of the project. The GPE's conclusion that the project would not result in any peculiar significant pedestrian safety impacts not identified in the HE EIR is supported by substantial evidence.

The HE EIR found that transportation impacts from future development under the Housing Element related to potentially hazardous conditions would be less than significant.

The department reviewed the proposed site plan, project's transportation trip generation including vehicle trips, and street configuration in the project vicinity, and concluded that the project would not result in any peculiar significant transportation impact with respect to pedestrian safety. The appellant has not provided any evidence to the contrary.

The appellant states the project would create significant pedestrian safety impacts peculiar to the project presumably because a new "24-car garage entrance will be established on a high pedestrian walk-way with entrance/exit onto a narrow road with low visibility." However, the appellant does not explain how this project would cause a greater risk of collisions that result in serious or fatal physical injury than a typical project (see the department's potentially hazardous condition criteria below). Also, the appellant does not provide any data substantiating the characterization of the fronting street as a "high pedestrian walk-way" and "narrow road with low visibility." The width of Webster Street at approximately 69 feet is a typical width for a classified neighborhood residential street in San Francisco. Webster Street is not located on the Vision Zero High Injury Network.

Per the San Francisco Transportation Impact Analysis Guidelines, the department evaluates whether the project would result in a hazard that could reasonably stem from the project. In this context, a "hazard" refers to a project-generated vehicle potentially colliding with a person walking, bicycling, or driving or public transit vehicle that could cause serious or fatal physical injury. Human error or non-compliance with laws, weather conditions, time-of-day, and other factors can affect whether a collision could occur.

[24] First Supplement to Appeal of San Francisco Planning Commission's CEQA Action for 2395 Sacramento Street, Appeal No. 2022-004172APL; *National Register of Historic Places Registration Form: Lane Medical Library*, Bridget Maley, December 8, 2023. Section 7, page 12.
[25] Olmstead, Roger and T. H. Watkins. *Here Today: San Francisco's Architectural Heritage*. San Francisco: Chronicle Books, 1969 (Ninth Printing).

However, for purposes of CEQA, hazards refer to engineering aspects of a project (e.g., speed, turning movements, complex designs, distance between street crossings, sightlines) that may cause a *greater risk of collisions that result in serious or fatal physical injury than a typical project.* None of these hazards are present for the proposed project. Further, HE EIR transportation analysis (HE EIR Volume II page 4.4-92) discloses that individual buildings consistent with HE EIR, planning code requirements, and conformance with city design standards would not create potentially hazardous conditions for people walking; and the impacts of individual buildings consistent with the HE EIR would not create potentially hazardous conditions and would be less than significant; the transportation impacts of the project are not peculiar.

Therefore, the department concluded that the project would not result in any peculiar significant transportation impact with respect to pedestrian safety. The appellant has not demonstrated that the conclusions in the GPE concerning pedestrian safety impacts are not supported by substantial evidence.

Response 8: The department conducted project-specific biological resources analysis based on the scope and location of the project. The GPE's conclusion that the project would not result in any peculiar significant biological resources impacts not identified in the HE EIR is based on substantial evidence.

The HE EIR found impacts on biological resources from future development under the Housing Element would be less than significant. Project-specific analysis was conducted. The project would not result in any peculiar significant biological resources impact that was not identified in the HE EIR for the following reasons.

Contrary to the appellant's assertion, the HE EIR (pp. 4.1-129 through 4.1-149) discusses biological resources impacts that would result from the implementation of the Housing Element 2020 Update. The HE EIR concludes that the implementation of the Housing Element 2020 Update would result in less-than-significant biological resources impacts. This is because certain species (e.g., falcons) are acclimated to an urban (highly disturbed) environment and existing local, state, and federal laws, regulations, and policies would require measures to protect special status species or their habitats. The existing laws, regulations, and policies include the federal and California Endangered Species Acts, federal Migratory Bird Treaty Act, California Fish and Game Code, section 139 (Standards for Bird-Safe Buildings) of the San Francisco Planning Code, article 4.2 sections 147-147.6 (Stormwater Management Ordinance) of the San Francisco Public Works Code, article 16 (Urban Forestry Ordinance) of the Public Works Code, and the Environmental Protection and Open Space Elements of the San Francisco General Plan. These laws, regulations, and policies would ensure that if protected species be present on the project site at the time of on-site construction for the project in a way that may be adversely affected by construction activity, the project sponsor would be required to implement measures to protect such species (e.g., providing a protective buffer area) under the aforementioned laws and associated regulations.)

The existing site consists of two lots, one with an existing building and paved area and the other with an open space with six trees. According to appellant's observation memo, there were no protected species *on* the project site during the site visit conducted on November 21, 2023. Western gulls, which are designated as

a Bird of Conservation Concern[26] by the U.S. Fish and Wildlife Service, were observed flying through the "airspace that would be taken by the building additions of the project site." In compliance with the laws above, the project sponsor would be required to implement protective measures prior to construction should species be observed on-site. Therefore, the project would not result in a substantial adverse effect on habitat for species protected under local, state, or federal laws.

In addition, the project would be required to comply with Planning Code section 139, Standards for Bird-Safe Buildings, to minimize the potential for birds colliding with the proposed building. In compliance with the standards, the project would result in a less-than-significant impact with respect to bird collisions.

Therefore, appellant's assertion is incorrect. The project would result in a less-than-significant impact with respect to biological resources. No mitigation measures are required. The appellant has not provided substantial evidence to the contrary.

Conclusion

The planning department conducted CEQA review for the project and prepared a 35-page GPE, including figures, and several technical studies and appendices supporting its analysis and conclusions. The GPE provides sufficient analysis to substantiate the finding that the project qualifies for a general plan evaluation pursuant to CEQA section 21083.3 and CEQA Guidelines section 15183. The appellant has not demonstrated that the planning department's determination that the proposed project qualifies for a GPE is not supported by substantial evidence in the record. The planning department conducted necessary project-specific analyses following accepted methodologies, and as permitted under the referenced CEQA provisions, identified applicable mitigation measures from the Housing Element 2022 Update EIR for the project that avoid significant environmental impacts. The department provided the planning commission with the information and documents necessary to make an informed decision at a noticed public hearing in accordance with the planning department's GPE initial study and standard procedures, and pursuant to CEQA and the CEQA Guidelines. Therefore, the planning department respectfully recommends that the board of supervisors uphold the department's determination that the GPE conforms with the requirements of CEQA and reject the appeal.

[26] Birds of Conservation Concern are the birds that represent the highest conservation priorities of the U.S. Fish and Wildlife Service (USFWS). USFWS, Birds of Conservation Concern 2021, Migratory Bird Program. Accessed December 2023. Available online at: https://www.fws.gov/sites/default/files/documents/birds-of-conservation-concern-2021.pdf

Planning Dept Appeal Response
Attachment A

Historic Resource Evaluation Response

August 18, 2023

San Francisco Planning

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San Francisco, CA 94103
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HISTORIC RESOURCE EVALUATION RESPONSE

Record No.:	**2022-004172ENV**
Project Address:	**2395 SACRAMENTO ST**
Zoning:	RM-1 RESIDENTIAL- MIXED, LOW DENSITY Zoning District 40-X Height and Bulk District
Block/Lot:	0637/015
Staff Contact:	Michelle Taylor – 652-628-7352 Michelle.Taylor@sfgov.org

Updated: *August 18, 2023*

PART I: Historic Resource Evaluation

EVALUATION BACKGROUND

2395 Sacramento Street is San Francisco City Landmark No. 115 under Article 10 of the San Francisco Planning Code. The Landmark Designation Ordinance for 2395 Sacramento Street was limited to the exterior of the subject property and did not formally designate any portions of the interior through the city landmark designation process. Portions of the former library interiors are publicly accessible and therefore, for the purposes of CEQA, are subject to review by the Department's Historic Preservation staff.

PROJECT SPONSOR SUBMITTAL

To assist in the evaluation of the proposed project, the Project Sponsor has submitted a:

☐ Supplemental Information for Historic Resource Determination Form (HRD)
☒ Consultant-prepared Historic Resource Evaluation (HRE)
Prepared by: Richard Brandi

Staff consensus with Consultant's HRE report: ☒ **Agree** ☐ **Disagree**

Additional Comments: Planning Staff generally concurs with Historic Resource Evaluation provided by Richard Brandi but have refined the consultant's evaluation to specifically analyze the significance of only public interiors, as required by CEQA.

BUILDINGS AND PROPERTY DESCRIPTION

Neighborhood: Pacific Heights
Date of Construction: 1912
Construction Type: Steel Frame
Architect: Albert Pissis
Builder: Unknown
Stories: 3-over basement + attic

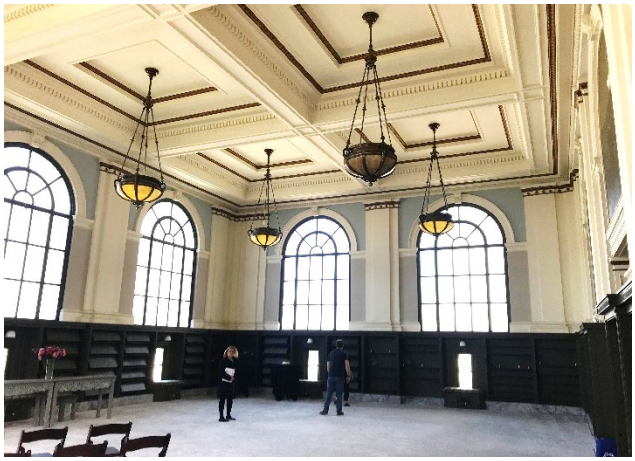
Roof Form: Hip
Cladding: Sandstone and Cement
Primary Façades: Sacramento (North) and Webster (West) and South
Visible Facades: North, East, South and West

EXISTING PROPERTY PHOTOS / CURRENT CONDITIONS (EXTERIOR)

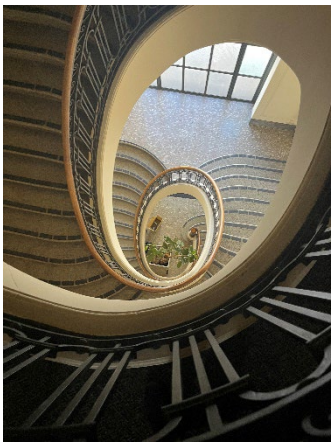
North and West elevations (HRE)

South and East elevations (Planning Dept.)

EXISTING PROPERTY PHOTOS / CURRENT CONDITIONS (INTERIOR)



Main Reading Room (Planning Dept.)



Grand Staircase (Planning Dept.)

PRE-EXISTING HISTORIC RATING / SURVEY

☒ Category A – Known Historic Resource, per: City of San Francisco Landmark No. 115
☐ Category B – Age Eligible/Historic Status Unknown
☐ Category C – Not Age Eligible / No Historic Resource Present, per: _____

Adjacent or Nearby Historic Resources: ☒ Yes ☐ No

- 2266 California Street, Congregation Sherith Israel, National Register Listed Individual Resource
- 2018-2020 Webster Street, California Register-eligible resource

CEQA HISTORICAL RESOURCE(S) EVALUATION

Step A: Significance

Individual Significance	Historic District / Context Significance
Property is individually eligible for inclusion in a California Register under one or more of the following Criteria: **Criterion 1** - Event: ☒ Yes ☐ No **Criterion 2** - Persons: ☒ Yes ☐ No **Criterion 3** - Architecture: ☒ Yes ☐ No **Criterion 4** - Info. Potential: ☐ Yes ☒ No Period of Significance: 1912	Property is eligible for inclusion in a California Register Historic District/Context under one or more of the following Criteria: **Criterion 1** - Event: ☐ Yes ☒ No **Criterion 2** - Persons: ☐ Yes ☒ No **Criterion 3** - Architecture: ☐ Yes ☒ No **Criterion 4** - Info. Potential: ☐ Yes ☒ No Period of Significance: _____ ☐ Contributor ☐ Non-Contributor ☒ N/A

Analysis:

Property History and Background
2395 Sacramento Street, designated City Landmark No. 115, is a former medical library constructed in 1912 and designed by Architect of Merit Albert Pissis in the Beaux-Arts style. The subject property is located in the Pacific Heights Neighborhood. [1]

2395 Sacramento Street is a detached building on the southeast corner of Webster and Sacramento Streets and adjacent to a parking lot to the east and a vacant lot (Block 0637, Lot 015) to the south. As such, all elevations are visible from the street. The north, south, and west elevations featuring similar ornamental features and the east elevation relatively blank and utilitarian in design. Like many monumental buildings from the City Beautiful Movement, the ornate facades of the subject building are composed in a classically inspired tripartite massing. Specifically, at the base the subject building features horizontal banding and modest sash windows, a two-story central shaft is dominated by double-height arched windows, and the building is topped by a single story with rows of double-hung windows. The subject building is primarily clad with Colusa sandstone and features a hipped roof capped with widows walk.

[1] Landmarks Preservation Advisory Board, "Landmark No. 115: Health Science Library, 2395 Sacramento Street" (January 6, 1979). https://sfplanninggis.org/docs/landmarks_and_districts/LM115.pdf (Accessed October 2022)

According to the Historic Resource Evaluation and Planning Department records, at the turn of the twentieth century the Cooper Medical College proposed the construction of a monumental Medical Library to support the campus in the Pacific Heights neighborhood. In 1908, Stanford University acquired the Cooper Medical College and with it the commitment to erect what was promised to be the largest medical library west of Chicago. Completed in 1912, the building featured a grand spiral entry vestibule and staircase, library stacks, a series of open rooms, and an ornate, double height reading room. The latter of which featured tall windows, marble baseboards, and three murals by Artist of Merit Arthur F. Mathews. Early newspaper accounts of the building describe the interiors as follows:

> *The building covers an area of 60 by 100 feet, and contains a…basement with a large hall 40 by 56, with entrance from Webster Street, toilets, and the lowest story of the stackroom … The stacks will be four stories in height, constructed entirely of steel with glass floors … The first or main floor will have its entrance on Sacramento street [sic], and will contain the main vestibule, stair hall and reading-room, with an ornamental ceiling and walls lined with steel book cases, seven feet high, steel delivery desk and card index, also workroom. The mezzanine floor will contain two room with steel cases for two or more special libraries… The second floor will contain two large halls. The attic will be used for storage.* [2]

In 1959, Stanford University relocated the medical school to the Palo Alto campus. Subsequently, the Pacific Presbyterian Medical Center assumed control of the former medical campus, including the subject library building. From 1960 on, the use of the building ranged from medical library, to office, and other miscellaneous uses associated with the surrounding medical center.[3] Like most libraries, historic records suggest that the building had many related functions, including a quiet space for study, reference document depository, and occasional event space for local groups.[4] Advertisements and articles in the San Francisco Chronicle indicate that during that period the Medical Center made the library publicly accessible public use, such as a 1976 announcement which offered a range of medical resources, including the access to the medical library, for anyone in the community.[5] And in more recent years, prior to the sale of the building in 2017, the building was home to the non-profit Pacific Vision Foundation[6], as well as the Institute for Health and Healing which offered integrative medicine services, gift shop, and access to the medical library on a sliding scale fee system.[7]

Today, the building is largely intact, having undergone few major interior or exterior changes. Documented alterations to the interior of the building include the addition of a partition and furring walls at the second floor (architect: Albert Pissis), 1913; removal of partition and addition of book stacks at second floor, 1950; addition of stairs to access playground, 1989; and addition of new door and partition at basement, 2007. Although not documented, staff observed selective removal of some library stack shelving units.

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[2] "Superb Medical Library Assured San Francisco" San Francisco Chronicle (San Francisco, California), January 14, 1912: 30. NewsBank: America's News – Historical and Current. https://infoweb-newsbank-com.ezproxy.sfpl.org/apps/news/document-view?p=AMNEWS&docref=image/v2%3A142051F45F422A02%40EANX-NB-14E7D2A769BB46CA%402419416-14E584F1762E95DA%4029-14E584F1762E95DA%40. (accessed October 2022)

[3] For a more thorough history of the building ownership and use, the reader is directed to the Historic Resource Evaluation.

[4] For example, in 1967, the library building functioned as a venue for "Novemberfest" which included an art sale, domino tournament, and holiday craft fair. San Francisco Chronicle (1967) 2 Nov, p. 31, (online NewsBank).

[5] San Francisco Chronicle (1976) 1 Feb, p. 257, (online NewsBank).

[6] A number of obituaries from the early 2000's suggest donations be made to Pacific Vision Foundation, 2395 Sacramento Street, 2nd Level. For example, San Francisco Chronicle (2003) 22 Dec, p. 20, (online NewsBank).

[7] Whiting, S (2004) 'More Than Medicine East meets West at the Institute for Health & Healing, where acupuncture is as likely a painkiller as aspirin', San Francisco Chronicle (CA), 6 Jun, p. 26, (online NewsBank).

Interior Elements Subject to CEQA Review

To determine which spaces of the 2395 Sacramento Street were historically publicly accessible, the Planning Department reviewed the HRE, Department records, newspaper articles, and websites associated with the building. Based on these records, staff has concluded that the subject building was historically accessible as a medical library, medical resource center, and general community gatherings for an array of users, including students, medical staff, and public visitors. In addition to historic records, the Planning Department located more recent resources which advertise the availability of the subject building as a venue available for rental under the moniker Webster Hall. According to the venue's website, spaces available for rental include the Main Reading Room (referred to as the Main Hall), basement (Gallery), and library stacks.[8] In the latter space, some shelving has been removed and these open areas available as intimate lounge spaces.[9] As such, publicly accessible spaces include most of the basement, first floor, library stacks, and supportive circulation, including the entry at Sacramento Street and the grand staircase that extends from the basement to the attic.

Based on the above discussion, the Planning Department has determined that the basement, first floor, library stacks (floors 1-4), and associated circulation contain publicly accessible spaces and are subject to CEQA. Additionally, the Planning Department has determined that the grand staircase at the third and fourth floors, although not fully public, would affect the experience of these vertical elements from the publicly accessible entry vestibule and first floor landings, therefore, staff finds that the grand staircase, in its entirety, is subject to CEQA review.

Analysis

According to the Landmark Designation Ordinance the subject building is eligible for individual listing in the California Register of Historical Resources under Criterion 1 (events), 2 (persons), and 3 (architecture) and is not eligible under or 4 (information potential). Staff finds that the designation conclusions are applicable as it relates to the significance of the interiors.

According to the Landmark Designating Ordinance, the subject property is associated with events found to be sufficiently important to be significant under Criterion 1 for its associated with the first medical school in the western United States, University of the Pacific established in 1858, and later renamed the Cooper Medical College in 1882. Additional information provided in the HRE states that the subject building, which was established as the Lane Medical Library, "was the largest medical library west of Chicago".[10] Staff finds that for the purposes of CEQA, the distinction as a celebrated medical library in the western part of the country is also significant under Criterion 1.

Under Criterion 2, the Landmark designation ordinance found the building to be significant for association with Dr. Elias J. Cooper, founder of the University of the Pacific. Additionally, the designation identifies Dr. Levi Cooper Lane, nephew of Dr. Cooper, as significant for contribution of both his personal library and funds for the construction of the "monumental library". As noted in the HRE, and supported in historic accounts,

[8] https://www.websterhallsf.com/tour-brochure (accessed November 2022)
[9] Ibid.
[10] HRE, page 26 as quoted from: https://laneblog.stanford.edu/2021/04/05/a-history-of-lane-medical-library/ (Accessed October 2022)

credit for funding the library should also be given to Dr. Lane's wife Pauline Lane, who bequeathed a portion of her estate in memory of her late husband to fund construction of the library.[11] Therefore, staff finds that the building is significant under Criterion 2 for its association with Dr. and Mrs. Lane and Dr. Cooper.

Architecturally, the Landmark Designation notes that the subject building is significant as "a classic example of his [Architect of Merit Albert Pissis] restrained and balanced Beaux Arts style." Albert Pissis (1852-1914) was an architect of major importance at the turn of the 19th century. Born in Mexico to French parents, he moved to California in 1858 after studying at the Ecole des beaux arts in Paris and extensive European travel. He contributed buildings of major importance to the City architecturally, establishing the highest standard of quality. These include several individually recognized buildings, such as Borel building, Landmark #109; the Hibernia bank, Landmark #130; the Flood building, Landmark #154; and the Medical Library's neighbor, Congregation Sherith Israel, National Register Listed Individual Resource.

As noted, the Landmarks Preservation Advisory Board (pre-cursor to the Historic Preservation Commission), did not evaluate the interiors of the subject building for the designation of the property as a city landmark. Therefore, for the purposes of CEQA review, staff have evaluated the interiors of the building and concur with the consultant's overall findings that portions of the publicly accessible spaces of 2395 Sacramento Street are significant under Criterion 3. However, staff finds that the report does not relate the evaluation of the property between public and non-public spaces, but rather to the general architectural distinctiveness of specific rooms as features. For purposes of this evaluation, Department staff have refined the prepared analysis to only evaluate the significance of public spaces, as identified above. To this end, staff finds that the Sacramento Street entry vestibule, grand staircase (basement to attic), and Main Reading Room and Hall (2nd floor) are significant interior spaces that excellently convey the Beaux-Arts style as designed by Albert Pissis. Staff also concurs with Mr. Brandi that the grand staircase is a signature feature by Albert Pissis, who designed a similar element for the Mechanics Institute Library, Landmark No. 134, at 57 Post Street. Mr. Brandi did not evaluate the four-story stacks; however, as noted, staff finds that the library stacks are significant for their distinctive design, particularly the incorporation of glass floors, and as an important, integral feature associated with library use. Staff finds that the 2nd floor "working room" (adjacent to the Main Reading Room Hall) and basement lack distinctive finishes or features and therefore are not representative examples of Albert Pissis' work.[12]

Staff concurs with Mr. Brandi's findings that three murals, *Health and the Arts,* in the Reading Room of the subject building, are significant as representative examples of work by the Artist of Merit, Arthur F. Mathews. Mathews is recognized as an important California artist who, with his wife Lucia Mathews, was integral to the realization of a localized Arts and Crafts movement that combined natural materials, and influences of Northern California with contemporary European-inspired art techniques and trends.[13] Their artistic sensibilities were expressed through an array of modalities, including painting, furniture design and construction, a storefront , a magazine called *Philopolis*, and a specialized printing press. Mathews pained *Health and the Arts* during a particularly active period following the 1906 earthquake and the murals are representative of Mathews' body of work as a painter.[14] Other significant local large-scale paintings by Mathews include a twelve-panel series at the California State Capitol Building and a mural at the Mechanics Institute Library. The reader is directed to the HRE for additional information about Mathews and his work.

[11] Ibid.
[12] See significance floor plans at the end of this report.
[13] https://akronartmuseum.org/media/exhibition/california-as-muse-the-art-of-arthur-and-lucia-mathews/ (Accessed October 2022)
[14] https://bancroftlibrarycara.wordpress.com/arthur-frank-mathews-1860-1945/ (Accessed October 2022)

Based upon a review of information in the Department's records, the subject building is not significant under Criterion 4 since this significance criterion typically applies to rare construction types when involving the built environment. The subject building is not an example of a rare construction type. Assessment of archeological sensitivity is undertaken through the Department's Preliminary Archeological Review process and is outside the scope of this review.

Racial and Social Equity Analysis[15]

Although the Department finds that *Health and the Arts* is noteworthy as a representative example of Arthur Mathews' work as an artist, the Department also acknowledges that the depiction of Indigenous Peoples in the mural is derogatory and centers a European-biased narrative to the history and application of medicine.

According to the HRE, a dedication of the subject building in 1912, describes the three panels as follows:

> *One shows beneath a spreading oak an Indian medicine man—the primitive art of healing. Another is a medieval towered city with a red robed doctor reassuring a group of frightened people who cower before a woman with the "evil eye." In the central panel Urania [the muse of astronomy], in starry blue knells, with her hand upon a sphere, Therpsischore sic [Terpsichore, muse of lyric poetry and dance] with dancing girls embroidered on her cloak, ivy-crowned Thalia [muse of comedy] and dark draped Melpomene [muse of tragedy] and their sister muses surround a white clad woman, Hygeia [goddess of health, cleanliness and hygiene], and child.*

A more recent description of the mural states:

> *The first shows what Europeans would consider primitive medicine: a Native American healer holds out his hand over a woman patient. The second mural refers to classical Greece, depicting the god Apollo together with the nine muses representing the arts, plus Hygeia, the goddess of health. Set in an imagined Italian Renaissance city, the third mural depicts a proto-modern healer defending a woman falsely accused of witchcraft. Stopping well short of the 20th century, it suggests the turning point when early scientific medicine rejected superstition.*[16]

As noted above, the first panel features two American Indian individuals (the figures do not appear to be linked to a specific tribal community) performing an act of healing. Further, as described, the paintings are meant to represent various "primitive" or "superstitious" approaches to healing, in contrast to the "modern" Western-focused approach favored by the Stanford Medical Campus. As such, the Department finds that the depictions of American Indians perpetuate stereotypical, generalized representations of Indigenous cultures.

To address the biased nature of the murals and for input on treatment of the murals, staff recommends Native American Tribal notification and consultation if requested as part of any salvage, relocation, public interpretation or other treatment programs proposed for the murals.

[15] On July 15th, 2020, the San Francisco Historic Preservation Commission adopted Resolution No. 1127 centering Preservation Planning on racial and social equity.

[16] https://newfillmore.com/2007/02/08/art-met-craft-at-the-mathews-studio/ (Accessed October 2022)

Step B: Integrity

The subject property has retained or lacks integrity from the period of significance noted in Step A:					
Location:	☒ Retains	☐ Lacks	**Setting:**	☒ Retains	☐ Lacks
Association:	☒ Retains	☐ Lacks	**Feeling:**	☒ Retains	☐ Lacks
Design:	☒ Retains	☐ Lacks	**Materials:**	☒ Retains	☐ Lacks
Workmanship:	☒ Retains	☐ Lacks			

Analysis:
In order to be determined eligible for the CRHR, the subject building must be found to retain sufficient integrity to convey its historic significance under Criterion 1, 2, and 3. Planning staff concurs with the HRE's finding that entry vestibule, spiral staircase, first floor hall and reading room retain all seven aspects of integrity. Staff also finds that despite removal of some shelves, the stacks retain the majority of shelves such that it can continue to convey its significance associated with a supportive use integral to the function of the library. Therefore staff finds that the stacks retain all seven aspects of integrity. Therefore, the subject building retains integrity and is a historic resource individually eligible for the CRHR under Criterion 1, 2, and 3.

Step C: Character Defining Features

The character-defining features of the subject property include the following:

The period of significance is 1912, the subject building's year of construction, and as such, the subject building's character-defining interior features that retain enough integrity to convey its significance are[17]:

- Main Reading Room and Hall, including:
  - Murals by Arthur Mathews in Reading Room, inclusive of the three arches
  - Double-height, spatial volume of Reading room
  - Marble baseboards
  - Windows and window trim and moldings
  - Built-in steel bookcases around perimeter of Reading Room
  - Pilasters
  - Decorative and coffered ceilings
  - Chandeliers
  - Original wood doors into Reading Room
  - Raised steps and wood door into Stacks from Hall

- Surfaces and materials used in the main entry vestibule
- Spiral staircase connecting all floors of the building
- Four-story stacks with glass floors and steel shelving systems

The reader is also directed to review the significance plans and photos accompanying this analysis.

[17] Exterior character defining features were defined under Resolution No. 8587, per Landmark No. 115.

CEQA HISTORIC RESOURCE DETERMINATION

☒ Individually-eligible Historical Resource Present
☐ Contributor to an eligible Historical District / Contextual Resource Present
☐ Non-contributor to an eligible Historic District / Context / Cultural District
☐ No Historical Resource Present

NEXT STEPS

☒ HRER Part II Review Required
☐ Categorically Exempt, consult:
☐ Historic Design Review
☐ Design Advisory Team
☐ Current Planner

PART I: Principal Preservation Planner Review

Signature: Allison Vanderslice Date: 8/18/2023

Allison Vanderslice, *Principal Preservation Planner*
CEQA Cultural Resources Team Manager, Environmental Planning Division

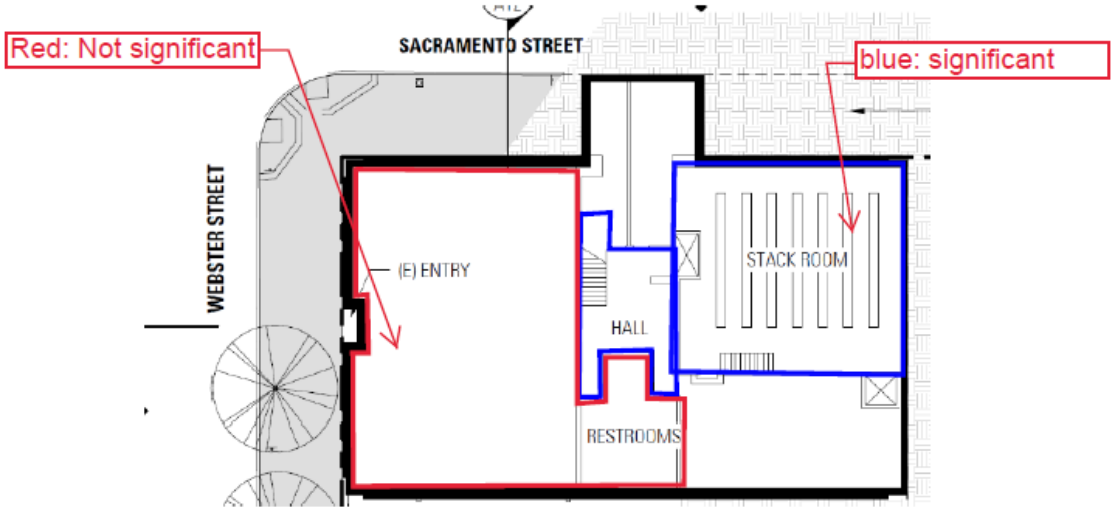
CC: Kei Zushi, *Senior Environmental Planner*
Environmental Planning Division

HRER PART I ATTACHMENTS:

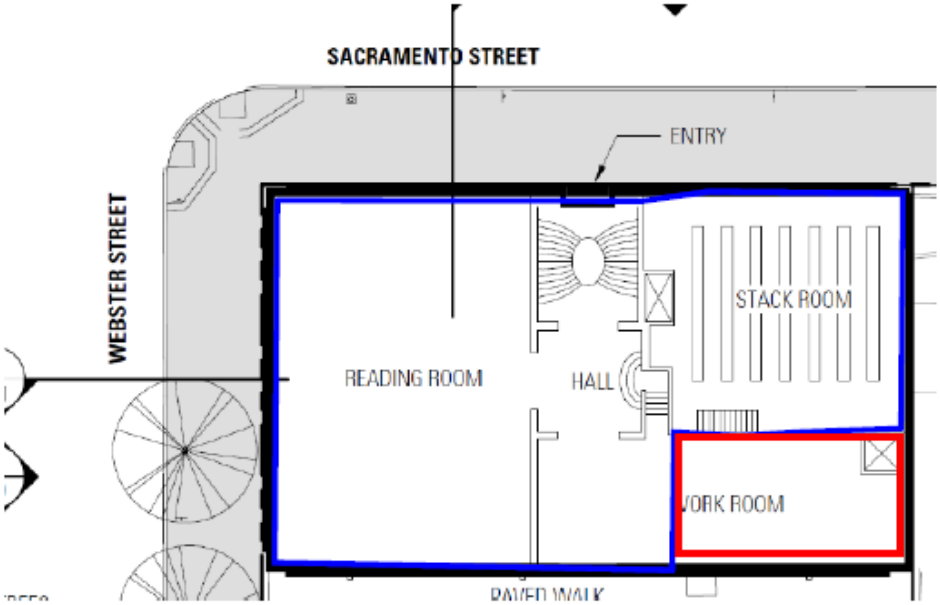
☒ Significance Plans and Photos

2395 Sacramento Street Significance Floor Plans

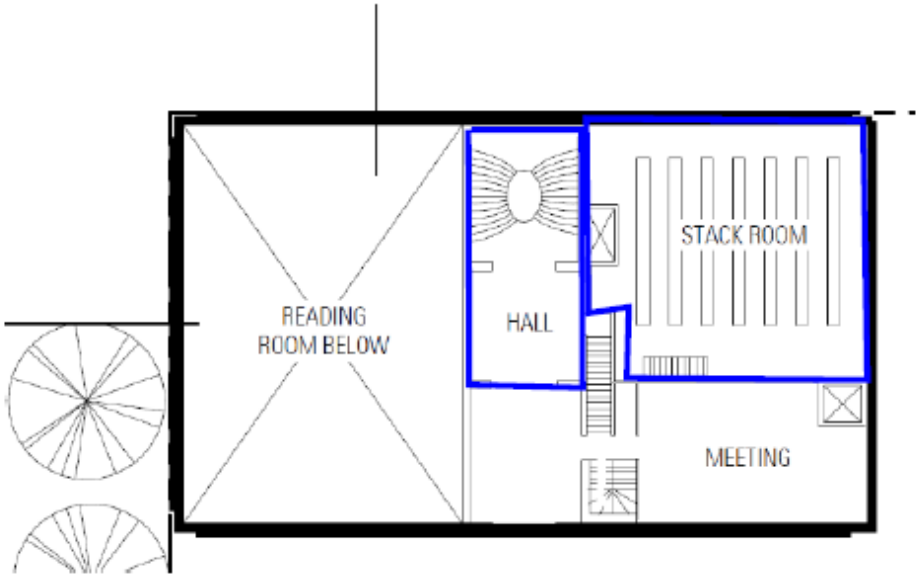
Red Outline: Publicly accessible spaces that are not significant for the purposes of CEQA
Blue Outline: Publicly accessible spaces that are significant for the purposes of CEQA
No Outline: Not publicly accessible spaces not evaluated for the purposes of CEQA



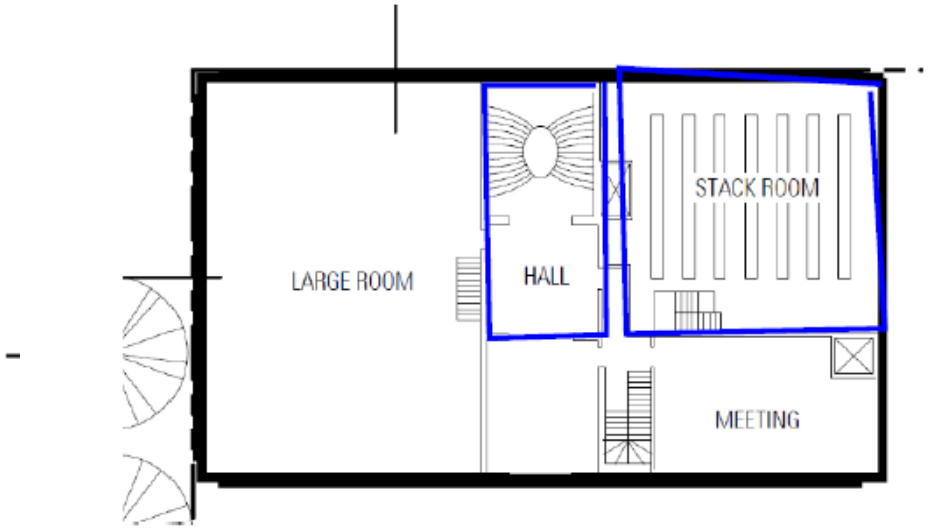
The entrance on Webster Street leads to the ground floor with an open space, restrooms, and stack room. Source: All floorplans taken from the Application for Preliminary Project Assessment November 30, 2021, Bar Architects.



The main floor contains the reading room, hall, work room and stack room.



The second floor has a hall, meeting room, and stack room.



The third floor has a hall, two meeting rooms and stack room.

Planning Dept Appeal Response
Attachment B

Historic Resource Evaluation Response Part 2

September 28, 2023

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
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HISTORIC RESOURCE EVALUATION RESPONSE

Record No.: 2022-004172ENV
Project Address: 2395 SACRAMENTO ST
Zoning: RM-1 RESIDENTIAL- MIXED, LOW DENSITY Zoning District
40-X Height and Bulk District
Block/Lot: 0637/016
Staff Contact: Michelle Taylor – 628-652-7352
Michelle.Taylor@sfgov.org

Part II: Project Evaluation

Proposed Project:		Per Drawings Dated:
☐ **Demolition / New Construction**	☒ **Alteration**	September 13, 2023

PROJECT DESCRIPTION

The subject property is a 24,850 square foot (sf), 4.5-story medical library building at 2395 Sacramento Street (block 0637, lot 016) and an adjacent 3,497 sf vacant lot at block 0637 and lot 015. 2395 Sacramento Street is San Francisco City Landmark No. 115 under Article 10 of the San Francisco Planning Code and is significant under Criterion 1 (events), Criterion 2 (people), and Criterion 3 (architecture). [1]

The Landmark Designation Ordinance for 2395 Sacramento Street was limited to the exterior of the subject property and did not formally designate the interior through the city landmark designation process. Portions of the former library interiors are, and have historically been, publicly accessible and therefore, for the purposes of CEQA, are subject to review by the Department's Historic Preservation staff. The Planning Department determined that portions of the former library interiors to be significant as detailed in the Historic Resource Evaluation Response, Part 1: 2395 Sacramento Street (dated November 8, 2022; updated August 18, 2023).

The proposed project scope would rehabilitate the library building and construct a seven-story over basement addition at the east elevation and a six-story addition at the south elevation of the subject building to accommodate a total of 24 dwelling units. The scope of work includes a four-story glass connector bridge between 2395 Sacramento Street and the new southern addition, new elevator run at the eastern roof of the existing building, and excavation to accommodate new below grade parking in the southern addition. Overall, the proposal would the following alterations:

[1] Landmarks Preservation Advisory Board, "Landmark No. 115: Health Science Library, 2395 Sacramento Street" (January 6, 1979).

Interior of 2395 Sacramento Street:

- Conversion of library spaces, including main Reading Room, Hall, and Stacks, to accommodate residential units.
- Full removal of library stacks with glass floors and steel shelving systems.
- Full removal of built-in steel bookcases in Reading Room.
- Demolition of raised steps and wood door into Stacks from Hall
- Loss of double-height spatial volume of Reading Room through the insertion of new partitions and a partial second floor.
- Removal of Reading Room chandeliers
- Partial obstruction of coffered ceilings (to be retained) through insertion of new partitions.
- Removal of murals

Exterior Modifications to 2395 Sacramento Street:

- New selective openings at first floor at Webster and Sacramento Street elevations to accommodate new windows in former Reading Room space.
- New openings at partially visible hip roof to accommodate skylights and balconies.
- Replacement of existing elevator run (non-contributing feature) with new taller elevator run with larger footprint.
- Four story horizontal connector bridge inserted at south elevation of historic building. Work will require enlargement of existing windows and visual obstruction of the selected area along with the eastern half of the south elevation. Proposed glass connector would be setback 45 feet from Webster Street property line.
- Partial burial of ground floor elevation at southern façade to accommodate garage.

Setting/Additions:

- Eastern Addition:
    - Infill of open area at east elevation of subject building with a seven-story over basement addition.
    - Top three floors of new eastern addition would be setback 10 feet from building face.
    - Clad in GFRC panels and vertically oriented zinc panels.
    - Aluminum-frame windows.
- Southern Addition:
    - Infill of vacant lot at Block 0637/Lot 015 with a new six-story addition connected by a four-story glass connector at the south elevation of 2395 Sacramento Street.
    - Clad in GFRC panels and vertically oriented zinc panels.
    - Aluminum-frame windows.

San Francisco Planning

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PROJECT EVALUATION

The proposed project's conformance with the Secretary of the Interior's Standards:								
Standard 1 – Minimal Change:	☐ Yes	☒ No	☐ N/A	**Standard 6** – Repairment:	☒ Yes	☐ No	☐ N/A
Standard 2 – Maintain Character:	☒ Yes	☐ No	☐ N/A	**Standard 7** – Treatments:	☐ Yes	☐ No	☒ N/A
Standard 3 – Avoid Conjecture:	☒ Yes	☐ No	☐ N/A	**Standard 8** – Archeology[2]:	☐ Yes	☐ No	☒ N/A
Standard 4 – Acquired Significance:	☐ Yes	☐ No	☒ N/A	Standard 9 – Compatibility:	☐ Yes	☒ No	☐ N/A
Standard 5 – Building Techniques:	☒ Yes	☐ No	☐ N/A	Standard 10 – Reversibility:	☐ Yes	☒ No	☐ N/A

*See **Project Impact Analysis** comments for additional information.*

PROJECT DETERMINATION

Based on the Historic Resource Evaluation in Part I, the project's scope of work:

☒ **Will** cause a significant adverse impact to the **individual historic resource** as proposed.
☐ **Will** cause a significant adverse impact to a **historic district / context** as proposed.

☐ **Will not** cause a significant adverse impact to the **individual historic resource** as proposed.
☒ **Will not** cause a significant adverse impact to a **historic district / context** as proposed.

PROJECT IMPACT ANALYSIS

According to the Secretary of the Interior's Standards for the Treatment of Historic Properties, Rehabilitation is the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values. 2395 Sacramento Street is significant under Criterion 1 (events), 2 (people) and 3 (architecture) and includes character defining features at the interior and exterior of the building. Therefore, when evaluating the proposed project (project) at 2395 Sacramento Street, the Department considered potential impacts to the building as a whole, evaluating impacts to setting, interior and exterior finishes, volumes, massing, features, and details. The proposed project (project) at 2395 Sacramento Street proposes to rehabilitate the former medical library to accommodate new residential housing. The scope includes retention, alteration, and removal of character defining features both externally and internally along with construction of two additions to the east and south of the subject building on an unoccupied portion of lot 016 (east of the subject building) and vacant lot 015 (south of the subject building). Upon review of the project, staff found that the project does not fully meet the Secretary of the Interior's Standards for Rehabilitation, specifically Standards 1, 2, 5, 9, and 10 and will result in a substantial adverse change in the significance of the historic resource.

[2] Assessment of archeological sensitivity is undertaken through the Department's Preliminary Archeological Review process and is outside the scope of this review.

A project generally conforms to Standard 1 if it retains the historic use or is given a new use that would result in minimal change to the property's distinctive materials, features, spaces, and spatial relationships. At the exterior, the proposed project will generally retain significant historic features and finishes, particularly at the north and west elevations. While some alteration or selective removal would occur at of portions of the south elevation, this work does not significantly prohibit the ability of the building to convey the historic institutional use of the subject building. This is in part because the street facing elevations (north and west), including character defining features, will largely be retained. Additionally, the building will retain the historic massing and stature as a prominent corner building. More noticeable exterior modifications will occur on the highly decorative southern elevation with the insertion of a four-story connector and partial burial of the ground floor to accommodate new below-grade parking. Even so, the proposed new additions are appropriately sited in relation to the building, and most exterior features associated with Beaux-Arts style will remain. However, at the interior, the new use will result in the substantial loss and removal of significant features, finishes, materials, and spaces that relate to the building's historic use, including full removal of the four-story library stacks, along with bookshelves, chandeliers, and murals in the Reading Room. Insertion of new residential units, including floors and partitions, will also irreversibly break-up the double-height volume of the Reading Room and interconnected volume of the library stacks. Therefore, although, the project would sufficiently retain exterior features, finishes, materials, and massing to continue to convey the historic use of 2395 Sacramento Street, many of the significant interior features associated with the former medical library will be lost and therefore the project does not fully conform with Standard 1.

Standard 2 provides that the historic character of a property be preserved, and that removal or alteration of distinctive features, materials, or spaces be avoided. Similarly, Standard 5, encourages preservation of distinctive features, finishes, and construction techniques or examples of fine craftsmanship that characterize a property. The proposed project would result in some loss or alteration of distinctive materials, features, and spatial volumes, including interior features stated above under Standard 1. Additionally, at the interior, the proposed project would remove the second-floor entry into the Library Stacks, including the stone steps and doors. The project would retain the primary circulation of the property, specifically the ornate staircase and entry lobby at Sacramento Street. At the exterior, the proposal would remove select portions of the roof to accommodate new skylights, balconies, and enlarged elevator run. Further, portions of the ornamented southern elevation would be removed and obscured to accommodate a partially below grade garage and a new four-story connector to a proposed southern addition. Although substantial portions of the north and west elevations would remain, staff finds that the cumulative loss of historic finishes, materials, and spaces both externally and internally, would not conform to Standards 2 and 5.

Standards 9 and 10 offers guidance related to new construction and additions to a historic resource. Under these Standards, new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. Additionally, new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment. In addition to moderate changes at the roof, including new skylights and balconies at the roof of the building, significant changes to the overall form and massing of the building include the construction of an addition at the eastern and southern elevations.

2395 Sacramento Street is a detached monumental building that features classically inspired proportions and features on three of its four elevations (north, south, and west). The eastern elevation is largely utilitarian in design and exhibits few of the character defining features found on the remaining elevations. Therefore,

although the proposed eastern addition will entirely obstruct the east elevation of 2395 Sacramento Street, it would not obscure character defining features and would generally "read" as an independent building. Staff finds construction of an addition at this site to be appropriate and removal of the addition in the future would not impair the essential form of the historic building. Staff also finds the use of GFRC panels and proposed solid to void ratio of new windows to be reasonably compatible with classically inspired materials and proportions of 2395 California Street. However, the proposed use of aluminum-frame windows and zinc metal panel cladding of the eastern addition do not appropriately relate to the historic finishes of 2395 Sacramento Street. Additionally, when evaluating scale of the project, the proposed addition, which would measure approximately 77 feet in height, is taller than the historic building by approximately 16 feet. The height difference is further emphasized by the laterally sloped lot, upslope from 2395 Sacramento Street, on which the addition will be sited. Therefore, despite appropriate siting and additive nature of the addition, the height of the proposed eastern addition would physically and visually overwhelm the historic building.

The southern elevation of 2395 Sacramento Street is highly ornamental and contributes to the overall architectural significance of the historic property. Proposed work at this elevation will include selective removal of the exterior wall and features to accommodate a four-story tall, 15-foot-long glass hyphen setback approximately 45 feet from the front property line. The glass hyphen will connect to a new six-story over-garage addition clad in a mix of GFRC and zinc panels with aluminum-frame windows. Insertion of subterranean garage would result in the burying of the ground floor windows at the southern elevation of 2395 Sacramento Street, which would both obstruct historic elements and modify the original base of the subject building. Despite the obscuring of the ground floor, staff finds that the siting of the hyphen and addition would generally maintain the visibility of the southern elevation 2395 Sacramento Street and reduce visual impacts to the historic building. Additionally, the hyphen would employ limited points of connection at modified existing openings at each story of the historic building thereby minimizing direct physical impacts to the historic elevation. However, similar to the eastern addition, proposed new materials, particularly metal panels and windows, would not appropriately relate to the historic building. On balance staff finds that the proposed southern addition does not fully conform to Standard 9 as it relates to materials and massing and does not meet Standard 10 due to the loss of materials required to accommodate the connecting hyphen.

The proposed project at 2395 Sacramento Street would have a significant impact on the historic resource. The proposed project would change the historic use of the former library to a medium-density residential use, involving modification of interior volumes and insertion of new floor plates, removal of signification interior finishes and features, and construction of two additions. Although appropriately sited, the project is not entirely deferential in material, scale, or massing with 2395 Sacramento Street. Therefore, staff finds that the project would significantly alter, and in some cases remove the distinctive materials, features, spaces, and spatial relationships of the subject building as identified in the character-defining features. As such, staff finds that the proposed project/undertaking as a whole does not meet the Secretary's Standards and would result in a significant impact to 2395 Sacramento Street that could be reduced to less than significant with mitigations. These mitigations, as discussed below, will reduce material impairment of historic resources through means of the following measures: historical documentation of the resource which will record and provide architectural context for all removed and altered character-defining features, salvage of removed character-defining features, and public interpretation of building's historical and architectural significance. Together, these measures document, salvage, and present to the public, removed or altered character-defining features, spaces, and special relationships, and provides context and highlights those features remaining, which assists in retaining the overall historical significance of the resource. Additionally, measures requiring protection and monitoring of character-defining features during project construction activities will

help to ensure that these features are retained and appropriately treated (see below for discussion of mitigation measures).

CONTEXTUAL COMPATIBILITY ANALYSIS

The proposed project's compatibility with adjacent historic resources:

The subject property is located in a mixed-use, medium-density neighborhood comprised of a mix of institutional and residential building styles and types built between 1880 and 2015. The surrounding buildings vary in materials, height, and style and exhibit a varied architectural character. For example, on Sacramento Street, directly opposite 2395 Sacramento Street, are two five-to-six story medical buildings and further to the west, kitty corner to the subject property, is an eight-to ten-story multi-family residential building. Buildings directly east of the subject buildings and facing Sacramento Street include three- to four-story residential buildings. The block face on Webster Street, opposite 2395 Sacramento Street, is comprised of smaller-scale three to four story residential and commercial office buildings. And south of 2395 Sacramento Street and directly adjacent to the subject property are two historic resource properties: 2018-2020 Webster Street and 2266 California Street.

The Department considered the project's compatibility with the surrounding historic resources in addition to the proposed alterations relative to the site's individual significance. Abutting vacant lot 015, 2018-2020 Webster Street is a 3-story over garage residential building built circa 1885 in the Eastlake style and remodeled circa 2021; it is significant under Criterion 3 (architecture).[3] 2266 California Street, the Temple Sherith Israel, is located at the northeast corner of California Street. It is a monumental building constructed in 1905 and designed by Albert Pissis in the Beaux-Arts/Romanesque style. Temple Sherith Israel is individually listed on the National Register and features an impressive Byzantine-inspired dome and Romanesque architectural details.

Staff finds that the project would not materially impair the integrity of setting of the nearby historic resources and that the proposed project is not incompatible with the mixed use and scale of the surrounding context. As it relates to massing, the proposed southern addition at 2395 Sacramento Street would directly abut 2018-2020 Webster Street and would be in close physical and visual proximity to 2066 California Street. At approximately 68 feet in height, the overall massing of the southern addition is comparable in size with both the existing 2395 Sacramento Street and the Temple Sherith Israel. Therefore, while out of scale with the residential 2018-2020 Webster Street, the proposed southern addition is of comparable height with nearby buildings and would not be contextually out of place with the block and the surrounding area.

The eastern addition would be sited on an upsloping portion of the subject lot, and at 78 feet in height would be taller than many of the residential buildings east of the project site. However, the new addition is comparable in height with 2395 Sacramento Street and Temple Sherith Israel. Furthermore, the building fronts Sacramento Street and the siting of the addition would be physically and visually removed from 2018-2020 Webster Street and 2266 California Street. Therefore, staff finds that the new eastern addition is not wholly out of scale with the mixed height and massing of the surrounding context.

[3] See Case No. 2014.003052ENV

Materially, the proposed cladding of the eastern and southern additions with GFRC panels and zinc panels, would have no material relationship to the traditional use of wood at 2018-2020 Webster Street or limestone construction of the Temple Sherith Israel. However, the proposed materials are not out of context with the overall mixed building styles found in the surrounding context. Therefore, staff finds that these materials would not diminish the integrity of the two historic resources.

Per Standards 9 and 10 of the Secretary of the Interior's Standards, a new addition to be subservient to the historic resource. Staff finds that the proposed southern and eastern additions are not fully referential in scale, materials, or massing to the small-scale late 19th century residential building at 2018 Webster Street nor to the monumental and detail-rich features of the Temple Sherith Israel. However, given the mixed character of the surrounding context and monumental height of 2395 Sacramento Street and 2266 California Street, the proposed additions would not be out of place within the overall context of the area. Therefore, staff finds that the proposed project would not significantly alter the setting nor overall integrity of 2018-2020 Webster Street nor 2266 California Street such that they would no longer express their significance as historic resources.

*See **Cumulative Impacts Analysis** comments for additional information.*

Off-Site Impacts

Vibration

The Department evaluated potential vibration-related impacts to historic resources from construction activities. The proposed project would require construction equipment that would generate vibration at levels that could result in nearby historic structures, including 1818-1820 Webster Street and 2266 California Street. Vibration impacts are analyzed in the Noise Section of the GPE and *Project Mitigation Measure 1 (Modified Housing Element EIR Mitigation Measure M-NO-3a): Protection of Adjacent Buildings/Structures and Vibration Monitoring During Construction* will reduce this impact to less than significant.

Construction

The project site is located within a dense urban setting and proposed work will occur directly at, or adjacent to, historic resources, including 2395 Sacramento Street, 2266 California Street, and 2018-2020 Webster Street. The proposed project is expected to use heavy-duty construction equipment that may cause inadvertent damage to significant character defining features of historic resources. Best construction practices below will protect historic resources and reduce this impact to less than significant.

MITIGATION MEASURES

Implementation of the following Mitigation Measures identified in the Housing Element 2022 Update EIR would reduce the project's impacts on character defining features to historic resources to less than significant.

Mitigation Measure M-CR-1a: Avoid or Minimize Effects on Identified Built Environment Resources

The project sponsor of a future development project consistent with the housing element update that would result in material impairment to a built-environment historic resource, either an individual resource or a historic district, shall consult with the department's preservation and design staff on feasible means for avoiding or

reducing significant adverse effects on built-environment resources per applicable department guidelines, such as residential design guidelines and policies in the urban design element. The project sponsor, in consultation with preservation and design staff, shall provide at minimum drawings and rendering of a proposed project that avoids material impairment of the historic resource in order for the environmental review officer (ERO) to determine if such a project is feasible. Additional studies and reports, such as an economic feasibility analysis, may be required as directed by the ERO. If the project is determined infeasible based on the above criteria, the project sponsor shall consult with the department's preservation and design staff to determine an approach to reduce the significant impact on built environment resources. This could include, but is not limited to, retaining a portion of the existing building or retaining specific character-defining features and incorporating them into the project. The project sponsor shall demonstrate the feasibility, as defined in CEQA Guidelines section 15364 and as determined by the ERO, of retention of character-defining features or a portion of the existing building to the department's preservation and design staff by providing drawings and renderings along with other requested studies and reports.

During the review process of the project, Planning Department preservation and design staff offered comments on feasible means to reduce the significant adverse impacts on historic resources. The project sponsor revised the project in the following significant ways since the original submittal to the Department on November 30, 2021:

- Reduction of overall massing of new southern and eastern additions by reducing overall floor to ceiling heights of new residential units.
- Reduction in height of the connector between 2395 Sacramento Street and new eastern addition, from six stories to four stories.
- Removal of a two-story vertical addition on 2395 Sacramento Street.
- Reduction in the overall exterior material demolished or removed at exterior walls and at roof of 2395 Sacramento Street.
- Re-use and modest enlargement of existing elevator run on 2395 Sacramento Street, rather than construction of a new elevator run.
- Regularize building form by eliminating angled front building walls at eastern and southern additions.

The above changes were the identified feasible means which would reduce overall impacts to the historic property without reducing proposed number of dwelling units or other programmatic needs of the proposed project. Overall, the Department finds that the implementation of these changes would reduce the project's impact on the subject property, as they would result in a reduced loss of historic materials and retention of the massing and volume of the subject building. Furthermore, the revised design of the proposed addition would result in greater compatibility with the subject building and the two nearby historic resources.

Mitigation Measure M-CR-1b: Best Practices and Construction Monitoring Program for Historic Resources
Prior to the issuance of demolition, building, or site permits, the project sponsor of a future development project consistent with the housing element update using heavy duty construction equipment on a project site that contains a historic resource or on a project site that is adjacent to a historic resource shall incorporate into contract specifications a requirement that the contractor(s) use all feasible means to protect and avoid damage

to onsite and adjacent historic resources as identified by the department, including, but not necessarily limited to, staging of equipment and materials so as to avoid direct damage, maintaining a buffer zone when possible between heavy equipment and historic resources, or covering the roof of adjacent structures to avoid damage from falling objects. Specifications shall also stipulate that any damage incurred to historic resources as a result of construction activities shall be reported to the environmental review officer within three days. Prior to the issuance of demolition, building, or site permits, the project sponsor shall submit to the department preservation staff for review and approval, a list of measures to be included in contract specifications to avoid damage to historic resources. If damage to a historic resource occurs during construction, the project sponsor shall hire a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations, part 61). Damage incurred to the historic resource shall be repaired per the secretary's standards in consultation with the qualified professional and department preservation staff. If directed by department preservation staff, the project sponsor shall engage a qualified preservation professional to undertake a monitoring program to ensure that best practices are being followed. If monitoring is required, the qualified preservation professional shall prepare a monitoring plan to direct the monitoring program that shall be reviewed and approved by department preservation staff.

Although construction-related damage to the subject property is unlikely, the project site is physically constrained and in close proximity to adjacent historic resources. Therefore, staff finds that implementation of best practices and construction monitoring to be necessary to reduce potential direct impacts to historic resources through construction-related damages.

Mitigation Measure M-CR-1d: Documentation[4]
Prior to the issuance of demolition, building, or site permits, the project sponsor shall submit to the department for review photographic and narrative documentation of the subject building, structure, object, material, and landscaping. Documentation may apply to individually significant resources as well as district contributors and shall focus on the elements of the property that the project proposes to demolish or alter. The documentation shall be funded by the project sponsor and undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as deemed appropriate by the department's preservation staff), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations, part 61). The department's preservation staff will determine the specific scope of the documentation depending upon the individual property's character-defining features and reasons for significance. The documentation scope shall be reviewed and approved by the department prior to any work on the documentation. A documentation package shall consist of the required forms of documentation and shall include a summary of the historic resource and an overview of the documentation provided. The types and level of documentation will be determined by department staff and may include any of the following formats:

- *HABS/HALS-Like Measured Drawings*
- *HABS/HALS-Like Photographs*
- *HABS/HALS-Like Historical Report*

[4] For full text, see Mitigation Measure M-CR-1d: Documentation as developed in the 2022 Housing Element Update Mitigation Monitoring and Monitoring Report Program dated December 15, 2022.

- *Print-on-Demand Book*
- *Digital Recordation*

Although documentation of the subject property through visual and narrative mediums cannot mitigate an impact to less than significant, formal memorialization of elements removed or altered by a project offers an important means of recordation that can support the efficacy and strength of additional mitigation measures, such as interpretation and salvage, and ensure that the property's design elements are documented and available for the public now and in the future.

Mitigation Measure M-CR-1f: Salvage Plan
Prior to the issuance of demolition, building, or site permits that would remove character-defining features of a built environment historic resource that would have a significant impact, the project sponsor shall consult with the department's preservation staff as to whether any such features may be salvaged, in whole or in part, during demolition or alteration. The project sponsor shall make a good faith effort to salvage and protect materials of historical interest to be used as part of the interpretative program, incorporated into the architecture of the new building that will be constructed on the site, or offered to non-profit or cultural affiliated groups. If this proves infeasible, the sponsor shall attempt to donate significant character-defining features or features of interpretative or historical interest to a historical organization or other educational or artistic group. The project sponsor shall prepare a salvage plan for review and approval by the department's preservation staff prior to issuance of any site demolition permit. The salvage plan shall focus on salvage of chandeliers and bookshelves as well as other character-defining features and features of historical interest. Additionally, the salvage plan shall include specifications for the removal and salvage of the Reading Room murals by a qualified art conservator and shall also include coordination and consultation with interested tribal groups is required to gather input on future treatment of the murals, including, but not limited to, public interpretation.

Salvaging of historic features in general will support potential opportunities to re-use, display, and interpretation of distinctive features and finishes. Removal and salvage of interior features, such as chandeliers and bookshelves may be incorporated into the proposed interior design as a visual reference to the historic use of the former medical library. Special care must also be made with the removal and salvage of the Reading Room murals by a qualified art conservator will ensure opportunities for future display of the murals. Coordination and consultation with interested tribal groups is required to gather input on future treatment of the murals, including, but not limited to, public interpretation.

Mitigation Measure M-CR-1g: Interpretation
The project sponsor shall facilitate the development of a public interpretive program focused on the history of the project site, its identified historic resources, and its significant historic context. The interpretive program should be developed and implemented by a qualified design professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, as well as a professionally qualified historian or architectural historian, or community group approved by the department. Through consultation with department preservation staff, coordination with local artists should occur. The primary goal of the program is to educate visitors and future residents about the property's historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts.

The interpretive program shall be initially outlined in an interpretive plan subject to review and approval by the department's preservation staff prior to approval of demolition, building, or site permits for the project. The plan shall include the general parameters of the interpretive program including the substance, media, and other elements of the interpretative program. The interpretive program shall include within publicly accessible areas of the project site permanent display(s) of interpretive materials concerning the history and design features of the affected historic resource, including both the site as a whole and the individual contributing buildings and features. The display shall be placed in a prominent, public setting within, on the exterior of, or in the vicinity of newly constructed buildings or other features within the project site. The interpretive material(s) shall be made of durable all-weather materials and may also include digital media in addition to a permanent display. The interpretive material(s) shall be of high quality and installed to allow for high public visibility. Content developed for other mitigation measures, as applicable, including the oral history and documentation programs, may be used to inform and provide content for the interpretive program. For properties that do not have a completed Historic Resource Evaluation, the professionally qualified consultant shall undertake research to sufficiently place the historic resource within its larger historic context (geographic and thematic). The interpretive program may also incorporate video documentation completed under M-CR-1f, Documentation, as applicable to provide a narrated video that describes the materials, construction methods, current condition, historical use, historic context and cultural significance of the historic resource.

The detailed content, media, and other characteristics of such an interpretive program shall be coordinated and approved by the department's preservation staff. The final components of the public interpretation program shall be constructed and an agreed upon schedule for their installation and a plan for their maintenance shall be finalized prior to issuance of a Temporary Certificate of Occupancy.

The interpretive program shall be developed in coordination with the other interpretative programs as relevant, such as interpretation required under archeological resource mitigation measures and tribal cultural resource mitigation measures, Native American land acknowledgments, or other public interpretation programs.

The department will also ensure that any information gathered through the interpretative program development is integrated with SF Survey and Citywide historic context statement summarized above.

Development of a public interpretive program focused on the history of the project site, its identified historic resources, and its significant historic context will create publicly available opportunities to understand the significance of the property. Interpretation coupled with visually interesting documentation will educate visitors and future residents about the property's historical themes, associations, and lost contributing features within broader historical and social contexts. Development of an interpretive program for the Reading Room murals in coordination and consultation with interested tribal groups is required to address the biased nature of the murals.

Cumulative Impacts

The geographic scope, or cumulative study area, for cumulative historic architectural resource impacts includes the project site and two adjacent historic resources, 2018-2020 Webster Street and 2066 California. The project is not adjacent to an eligible historic district. There are no active planning cases within the cumulative study area associated with the two adjacent resources; therefore, the project would not result in significant cumulative impact to the historic resources.

CONCLUSION

The project does not conform or fully conform to the Secretary of the Interior's Standards 1, 2, 5, 9 and 10 and will result in a significant impact to 2395 Sacramento Street. Although the project would retain most distinctive historic features, materials, and finishes of the exterior building, the proposed project scope would result in the removal of significant interior spaces and finishes. Additionally, compatible siting of the additions and mixed character of the surrounding context would not offset impacts related to incompatible materials and scale of the additions in relationship with the subject property. Further, construction activities may result in direct or indirect impacts related to the subject property and nearby historic resources. However, the adverse impacts of the project can be reduced through the implementation of Mitigation Measures as outlined above such that they would reduce the project's impacts on historic resources to less than significant (LSM).

PART II: Principal Preservation Planner Review

Signature: Allison Vanderslice Date: Sept 28, 2023
Allison Vanderslice, *Principal Preservation Planner*
CEQA Cultural Resources Team Manager, Environmental Planning Division

HRER PART II ATTACHMENTS:

☐ Architectural Plans, dated: _____
☐ HRE / Supplemental, dated: _____
☐ HRER Pt.1, finalized date: _____

Planning Dept Appeal Response
Attachment C

Pedestrian Wind Assessment 2395 Sacramento Street, San Francisco, CA.
December 16, 2022

CPP WIND ENGINEERING CONSULTANTS

PEDESTRIAN WIND ASSESSMENT

2395 SACRAMENTO ST

SAN FRANCISCO, CA

CPP PROJECT 16609

16 DECEMBER 2022

PREPARED FOR

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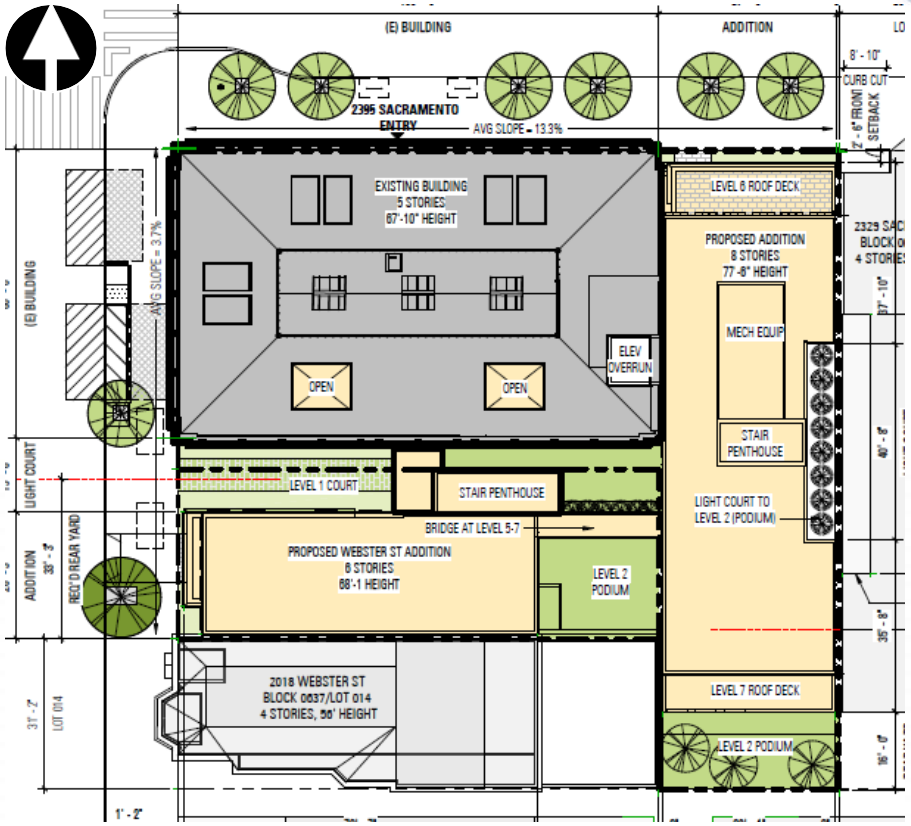
INTRODUCTION

CPP was retained to qualitatively assess the pedestrian wind conditions around the proposed 2395 Sacramento Street development in San Francisco, CA. As CPP understands, the project involves the construction of a 6-story and an 8-story building adjacent to and abutting the existing building at 2395 Sacramento Street. These buildings will include townhomes and flats and will incorporate a plaza court between the buildings at grade.

Based on the height of the development relative to the surrounding buildings and that the project is not located in a zoning district, it is CPP's opinion that a qualitative assessment is adequate to evaluate the anticipated wind conditions in lieu of a more detailed quantitative study in a wind tunnel. The results and recommendations presented in this report are based on:

- A review of the buildings' geometry/orientation relative to the wind climate to identify likely flow mechanisms contributing to the current and future wind conditions;
- Meteorological data from the San Francisco Wind Climatology Study derived from a detailed Weather Research Forecast (WRF) model and,
- Our experience and engineering judgement as gained through extensive wind engineering consultation and quantitative wind tunnel studies for other projects in the San Francisco area for regulatory purposes.



Site Plan of Proposed 2395 Sacramento St Development

SITE INFORMATION

The project is to be constructed at the southeast corner of the intersection of Sacramento Street and Webster Street and involves the construction of a 6-story and an 8-story building adjacent to and abutting the existing building at 2395 Sacramento Street.

The Parcels are to be constructed in the vacant lots on the south and east sides of the project site. The 8-story building on the east side of the existing building at 2395 Sacramento Street is referred to as the "Sacramento Street Addition" while the 6-story building to the south is referred to as the "Webster Street Addition".

The project site is primarily surrounded by low to mid rise buildings with several buildings to the north and west taller or equal in height to the development. As a result, the site is expected to be relatively sheltered from approaching winds.

Aerial View of Project Site (Google Earth™)

Aerial View of Project Site (Google Earth™)(Left) and 3D Model of Proposed Development (Right)

WIND DATA

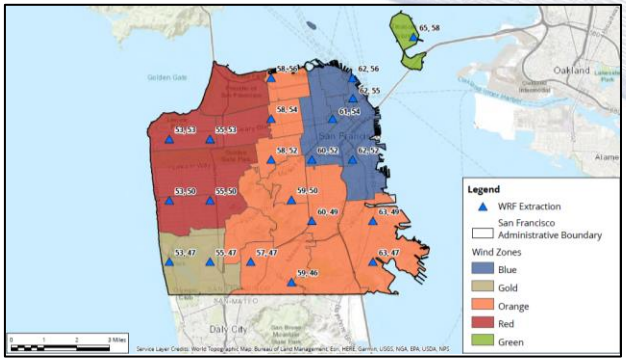
Wind data from the San Francisco Wind Climatology Study derived from a detailed Weather Research Forecasting (WRF) model were referenced to assess the prevailing wind directions associated with the predicted wind activity at the project site. This climatological model provides a standardized statistical representation of the wind climate of the City of San Francisco area.

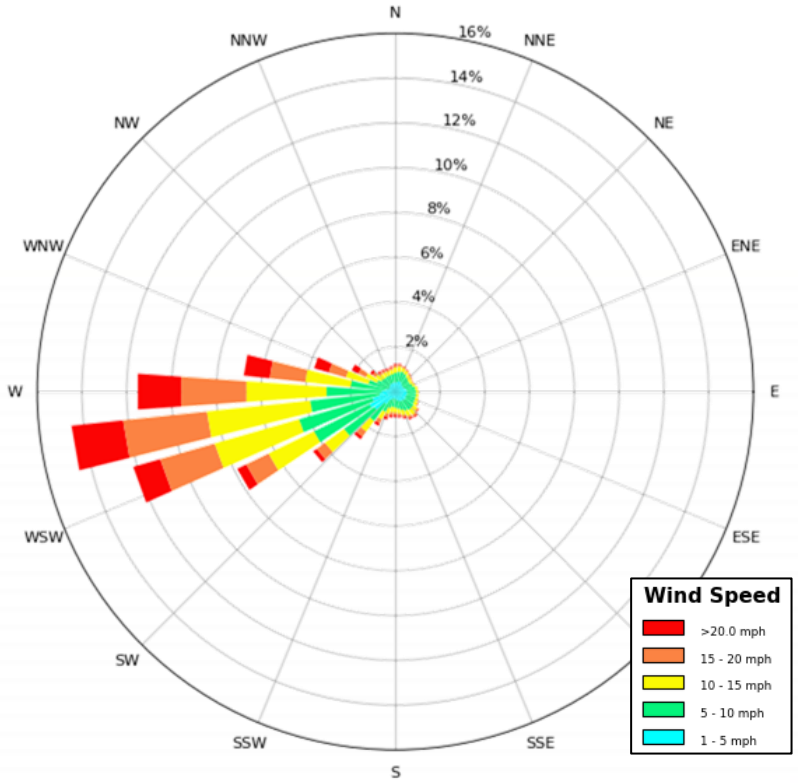
Due to the distinctive topography of the San Francisco area, five (5) wind zones demonstrating similar characteristics of wind speed and directionality were concluded. The proposed development is located within the “Orange” zone (see Image at right) and was referenced accordingly. The data for this wind zone is portrayed in the form of a wind rose which can be interpreted as follows:

- The arms of the wind roses point in the direction from where the wind is blowing from;
- The width and color of the arm represent the wind speed; and,
- The length of the arm indicates the percent of the time that the wind blows for that combination of speed and direction.

As can be seen, winds within the “Orange” zone primarily occur from the southwest through west-northwesterly directions. While winds from these directions are most frequent, they are also the strongest and usually the cause of potentially adverse wind conditions.

These aforementioned wind directions are the focus of CPP’s assessment of the anticipated wind conditions at the project site.





Map of Wind Zones in San Francisco (Top) and Probability of Wind Speeds by Direction - Orange Zone (2000-2019)

ASSESSMENT CRITERIA

PLANNING CODE SECTION 148

For most districts within San Francisco, the San Francisco Planning Department has established wind comfort and hazard criteria to evaluate the impact of a proposed development on the local wind climate experienced by pedestrians. The evaluation of the significance of these wind impacts is done in accordance with provisions of the California Environmental Quality Act (CEQA).

San Francisco Planning Code Section 148, Reduction of Ground Level Wind Currents in C-3 Districts, outlines wind reduction criteria for the Downtown Commercial (C-3) districts and requires buildings to be shaped so as not to cause ground-level wind currents to exceed the defined comfort and hazard criteria.

The proposed development is not located in a C-3 District. However, the provisions of Planning Code Section 148 are a widely accepted standard for the assessment of winds for districts of San Francisco without explicitly published wind requirements and will be used for the proposed project.

WIND COMFORT

Planning Code Section 148 establishes a pedestrian wind comfort criteria where wind speeds are not permitted to exceed: i) 7 mph in public seating areas, or, ii) 11 mph in areas of substantial pedestrian use, more than 10% of the time year-round between 7:00 a.m. and 6:00 p.m.

WIND HAZARD

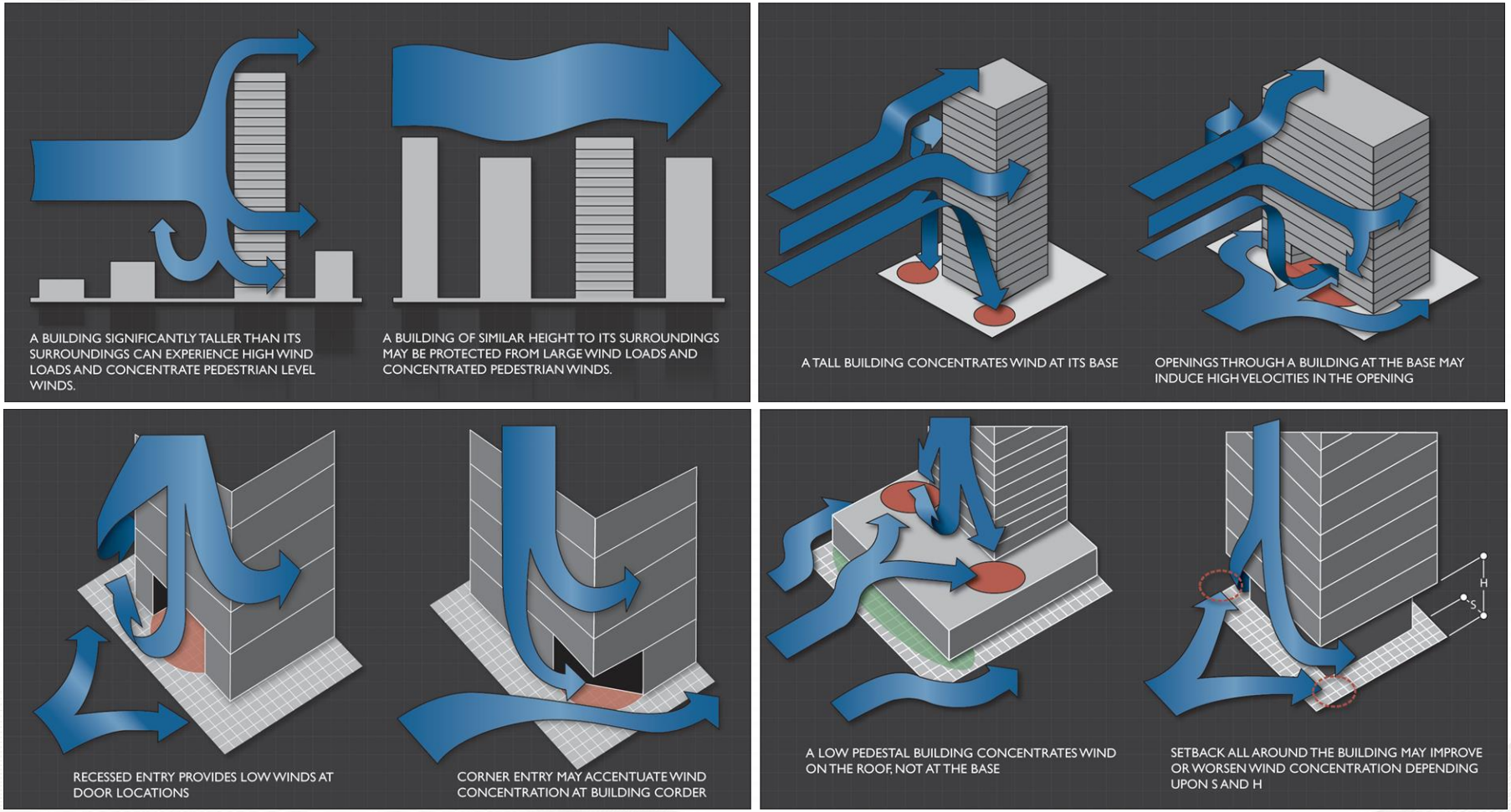
Planning Code Section 148 also establishes a pedestrian wind hazard criteria where wind speeds are not permitted to exceed the hazard level of 26 mph for a single hour of the year, or 0.0114% of the time.

Of note, as the wind climate data from the old San Francisco Federal Building were recorded for a minute on each hour, and the wind hazard threshold speed of 26 mph is based on an hourly average; a one-minute equivalent wind speed of 36 mph is used for the assessment of hazardous winds in San Francisco.

This same 36 mph wind hazard threshold is also used for the purposes of environmental review under the California Environmental Quality Act (CEQA), to determine if a project would have significant wind impacts.

COMMON WIND FLOW MECHANISMS

In our discussion of anticipated wind conditions, reference may be made to the common wind flow mechanisms depicted in the image below.

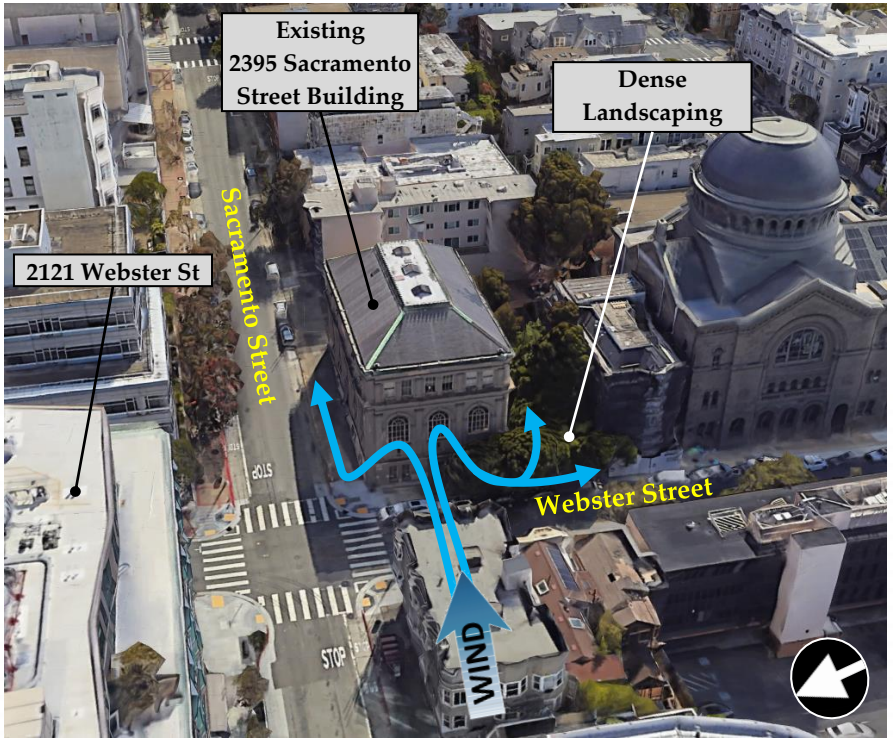


Common Wind Flow Mechanisms

ASSESSMENT OF WINDS

EXISTING SITE

- Prevailing winds from the westerly directions are expected to approach the site relatively unimpeded. The existing building receives little shelter from the massings on the west side of Webster Street. Those buildings are shorter and at a lower elevation, given the topography of the area.
- The 2121 Webster Street development northwest of the existing 2395 Street building is expected to provide shelter to the project site from northwesterly winds, but direct westerly winds along Sacramento Street.
- Westerly winds are expected to intercept the west façade of 2395 Sacramento Street, downwash towards grade and accelerate at the windward corners of the massing and flow along Sacramento Street and down Webster Street.
- The existing streetscaping along Webster Street is quite dense. There is also dense landscaping between 2395 Sacramento and the building immediately to the south. The local landscaping and streetscaping provide shelter from prevailing westerly winds. Removal of the streetscaping and landscaping would result in stronger winds in the areas south of the 2395 Sacramento building.
- Wind conditions around the existing site are expected to be conducive to pedestrians comfortably traversing the site. All spaces around the existing site are expected to meet the wind hazard criterion.

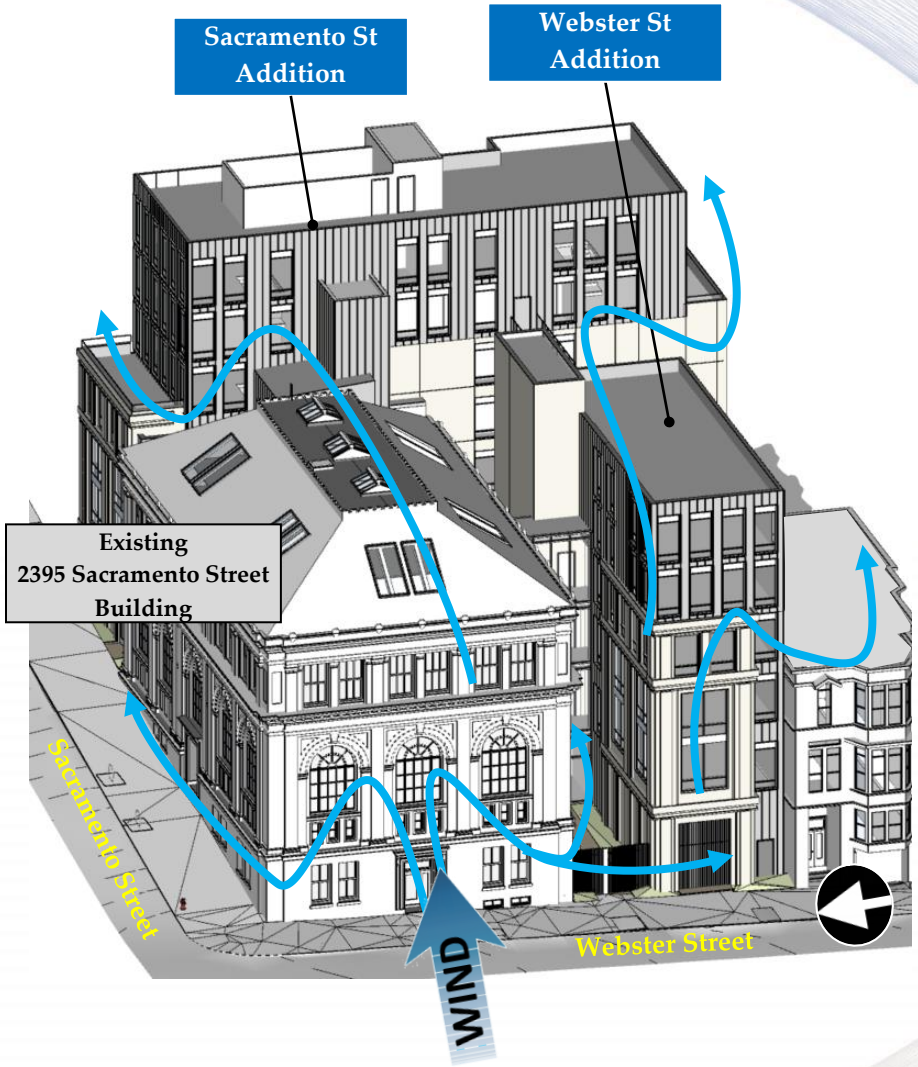


Aerial View of Site (Google Earth™) – Approaching Westerly Winds

ASSESSMENT OF WINDS

PROJECT SCENARIO

- Although the Sacramento St and Webster St additions will be taller than the existing 2395 Sacramento Street building, the buildings are located away from the street, which minimizes their potential to intercept and accelerate winds toward the pedestrian level.
- Similar to the existing site, prevailing winds from the westerly directions are expected to approach the site, intercept the west façade of the 2395 Sacramento Street building, downwash towards grade and accelerate at the windward corners of the massing and flow along Sacramento Street and down Webster Street.
- As CPP understands, the streetscaping along Webster Street (and Sacramento Street) will be preserved and will continue to limit the influence of down-washing winds along the sidewalks.
- The Webster St addition massing is expected to reduce the ability of wind to flow through the passage relative to the existing condition.
- With the addition of the proposed development, wind conditions around the site are expected to continue to be conducive to pedestrians comfortably traversing the site. Additionally, the proposed development is not expected to result in any exceedances of the wind hazard criterion, similar to the existing site condition.

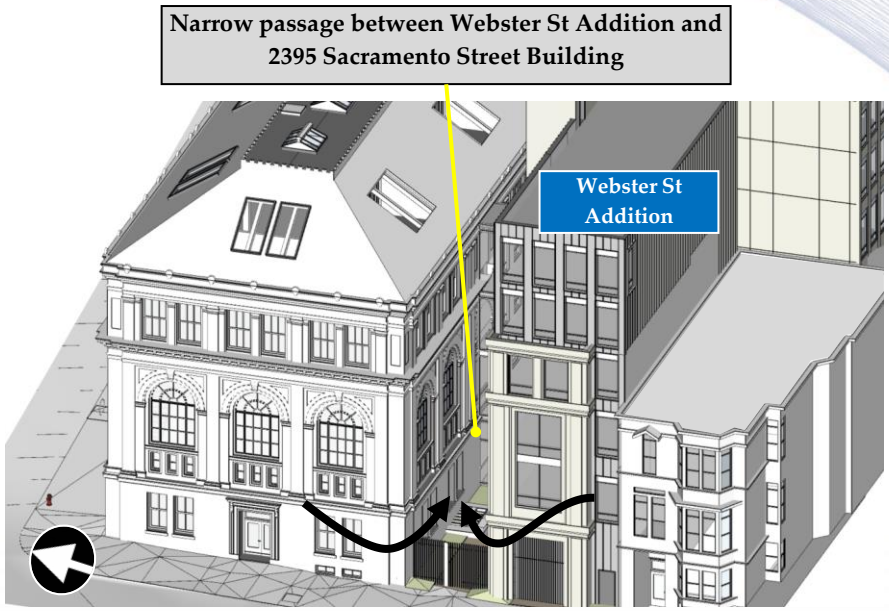


3D Model of Proposed Development – Approaching Westerly Winds

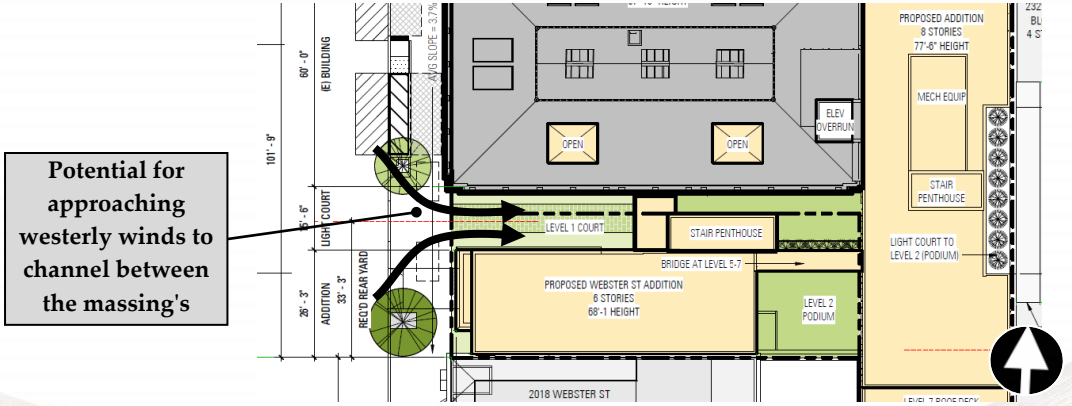
ASSESSMENT OF WINDS

PROJECT SCENARIO

- Winds approaching from the prevailing westerly directions have the potential to channel between the Webster St addition and 2395 Sacramento Street building, which may lead to wind conditions less suitable for passive / seating activities in the Level 1 court between the buildings.
- The passage becomes narrower further east between the massings. Due to the narrowness of this passage and that it is not open on the backside, winds are not expected to be accelerated through this passage in an adverse manner.
- The proposed landscaping along Webster Street is advantageous for limiting the wind flows affecting these areas. Additional landscaping in the vicinity of the light court on the west side of the development would provide additional benefit.



3D Model of Proposed Development – Approaching Westerly Winds



Level 1 Site Plan – Approaching Westerly Winds

ASSESSMENT OF WINDS

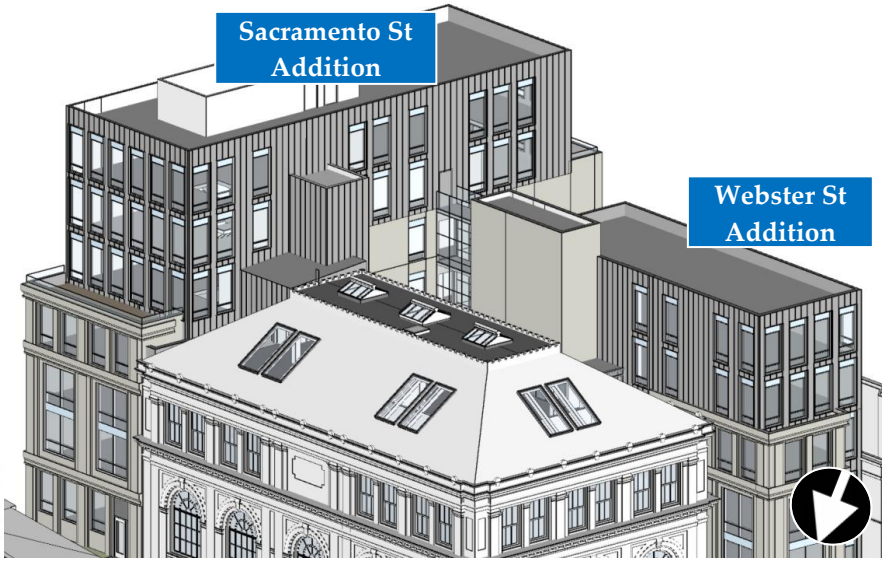
PROJECT SCENARIO

- As CPP understands, there are several roof decks proposed for both additions that will be a mix of common and private spaces.

- As there are limited taller buildings in the vicinity of the project site, these higher roof decks and terraces are expected to be relatively exposed to prevailing winds and, as a result, less conducive to passive pedestrian activities.

- If the indented programming of these spaces are for activities where calmer wind conditions may be sought (i.e., dining, seating, lounging etc.), consideration could be given to the inclusion of a combination of wind control measures for improved wind conditions including:

    - Tall guardrails (8-10 ft tall) along the western and northern edges of all terrace spaces, given the prevailing wind directions for the area, and/or;
    - Landscaping elements (i.e., planters, hedges, trees etc.) interspersed through the roof deck spaces to provide localized areas of protection in areas designated for seating.



3D Model of Proposed Development – Roof Decks

Examples of Amenity Terrace Wind Control Solutions

APPLICABILITY

The evaluation of the wind conditions around the proposed 2395 Sacramento Street development are based on a qualitative screening-level assessment leveraging CPP's knowledge of wind flows around buildings, the local wind climate and wind studies for other developments conducted throughout the San Francisco area.

The findings of this assessment are based on the Project Application drawings package dated 7 December 2022 and 3D design information of the development received on 15 December 2022. If changes to the design of the development have occurred beyond this date, it is recommended that CPP be contacted to evaluate the impact of any design changes relative to the wind conditions predicted within this report.

If more detailed evaluation of the predicted wind conditions is required, this would need to be conducted through quantitative evaluation of the project site through testing of a scale model in a wind tunnel under a separate scope of study.

Planning Dept Appeal Response
Attachment D

Pedestrian Level Wind Assessment 2395 Sacramento Street, San Francisco, CA.

October 12, 2023

12 October 2023

March Capital Management
2040 Webster Street
San Francisco, CA 94115

Christopher Nalen
Senior Project Manager
christopher@marchcapitalfund.com

Re: 2395 Sacramento St; Pedestrian Level Wind Assessment
CPP Project 18903

Background

CPP conducted a qualitative pedestrian-level wind analyses for the proposed 2395 Sacramento Street development in San Francisco, CA. This qualitative level assessment evaluated the impact of the proposed project on the surrounding pedestrian wind environment taking into consideration the massing and form of the proposed development, the surrounding built environment, terrain and local wind climate.

CPP's initial findings are summarized in the "Pedestrian Wind Assessment" report dated 18 March 2022 based on the 3D geometry information received on 3 March 2022 (left Image in Figure 1). Following this initial assessment, the design of the development evolved and CPP was retained to provide an updated assessment. The findings of this updated assessment are summarized in the "Pedestrian Wind Assessment" report dated 23 December 2022 based on the 3D geometry information received on 15 December 2022 (right Image in Figure 1).

Figure 1: 3D Models Showing the Various Massing's of the Proposed 2395 Sacramento Street Development Evaluated

Surrounding Developments

Although the proposed development is to be taller than the immediately adjacent buildings (i.e., the existing 6-story landmark building #115, 2018 Webster St etc.), several developments in the nearby vicinity of the project site are considerably larger, taller and wind exposed than the proposed development (see Figure 2 for reference).

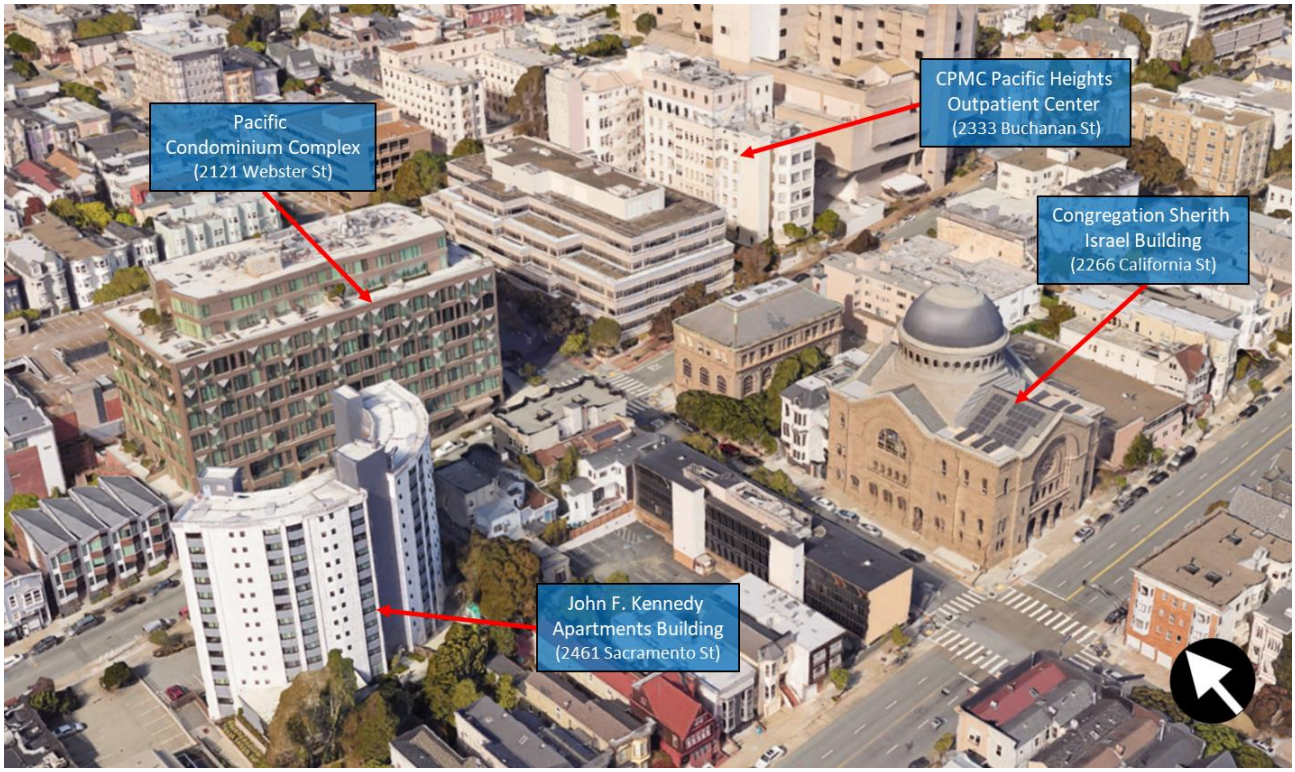


Figure 2: Aerial View of Project Site (Google Earth™) Denoting Various Massings Larger / Equal Size to Proposed Development

If areas of adverse wind conditions are currently perceived in the vicinity of the Project site, these conditions are likely largely attributed to winds that are intercepted, redirected and accelerated to areas in the public realm / sidewalks by these larger developments that have been identified.

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Project Wind Interaction

As the development is an in-fill construction of 2 buildings (the "Sacramento Street Addition" and "Webster Street Addition") around the existing landmark building, the tallest component of the development is to be inset within the block and away from the most wind exposed side of the block near Webster St, and therefore less likely to lead to increased wind activity along sidewalks around the site (see Figure 3).

Although the "Webster Street Addition" extends to be relatively in-line with the other buildings along Webster St, the building is aligned with the long axis parallel to the prevailing westerly winds which is of benefit and expected to further reduce the potential for the development to redirect winds towards sidewalk areas (see Figure 3).

Lastly, the "Sacramento Street Addition" and "Webster Street Addition" both include setback terrace / roof areas at Level 6 (~10' wide on the Sacramento Street side and ~3.5' wide on the Webster Street side). Although minor, these features of the massing are expected to provide some benefit in reducing the potential for winds to descend to sidewalk areas (see Figure 3).

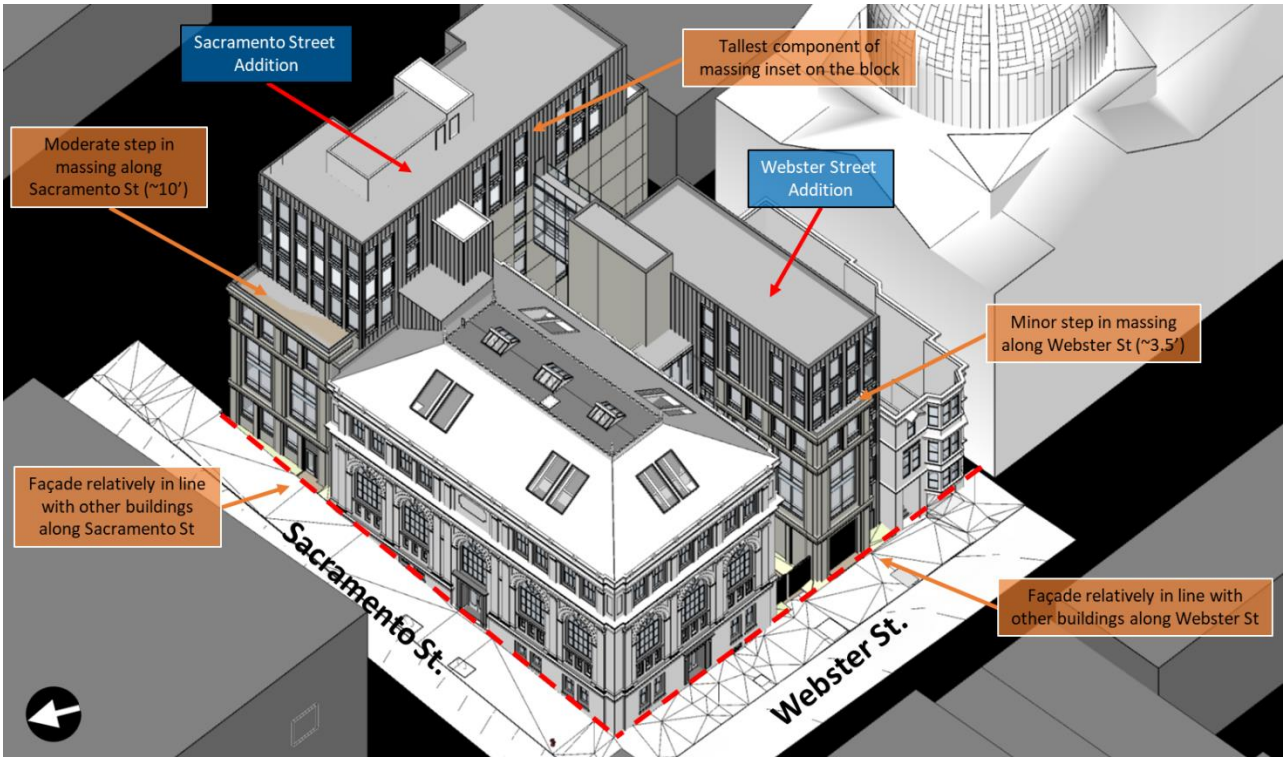

Figure 3: 3D Model Identifying Various Beneficial Massing Components of the Proposed 2395 Sacramento Street Development

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Planning Code Applicability

The project is to be located within a Residential-Mixed, Low Density (RM-1) zoning district within a 40-X Height & Bulk district[1]. While several districts through the San Francisco area have established wind comfort and hazard criteria to evaluate the impact of a proposed development on the local wind climate experienced by pedestrians, this zoning district is not subject to any Planning Code related wind controls governed by the San Francisco Planning Department.

However, the evaluation of potential wind impacts created by a development is to be done in accordance with provisions of the California Environmental Quality Act (CEQA) which requires state and local agencies to assess and disclose the potential for a project to have a significant wind impact for environmental review purposes.

San Francisco Planning Code Section 148, Reduction of Ground Level Wind Currents in C-3 Districts, outlines wind reduction criteria for the Downtown Commercial (C-3) districts and requires buildings to be shaped so as not to cause ground-level wind currents to exceed the defined comfort and hazard criteria. Although the proposed development is not located in a C-3 District, the provisions of Planning Code Section 148 are a widely accepted benchmark for the assessment of winds for districts of San Francisco without explicitly published wind requirements and was used as a reference for assessing the impact of the proposed project.

For the reasons relating to the zoning district and height / size of the proposed development, it is CPP's opinion that a qualitative screening level of the assessment is adequate to evaluate the anticipated wind conditions resulting from the addition of the development.

[1] SF PIM | Property Information Map | SF Planning (sfplanninggis.org) (accessed on 27 September 2023)

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Wind Climate

Wind data from numerous reputable sources was referenced for CPP's assessment of winds at the project site. These wind climate data sources include the San Francisco International Airport (SFO), the San Francisco Old Federal Building (located at 50 United Nations Plaza), and the San Francisco Wind Climatology Study derived from a detailed Weather Research Forecasting (WRF) model (see Figure 4 for reference).

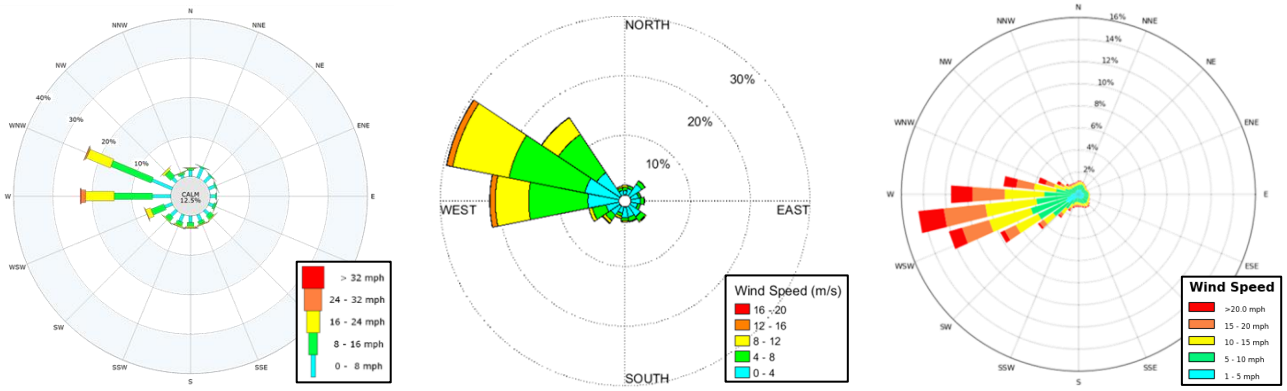

Figure 4: Probability of Wind Speeds by Direction Recorded at San Francisco International Airport (2005-2020) (Left), San Francisco Old Federal Building (1945-1948) (Middle), and San Francisco Wind Climatology Study (Orange Zone, 2000-2019) (Right)

These climatological sources were referenced to determine the most common wind directions for the San Francisco area in order to assess how winds from these associated directions would likely interact at the project site leveraging CPP's vast knowledge and experience of wind flows around the built environment.

These sources are widely referenced for all wind studies conducted within the San Francisco area and leveraged by all practitioners conducting wind assessments at both qualitative (expert opinion based) and quantitative (detailed wind tunnel evaluation) levels of the service.

As can be seen, the climatological data from these sources show similar trends in wind directionality with winds occurring primarily from the westerly (west northwest, west, northwest, and west-southwest) directions. These are the four most frequent and strongest wind directions and are usually the cause of potentially adverse winds experienced by pedestrians throughout the San Francisco area.

Of note, while winds may approach a site from these predominant directions, the perception of wind directionality at pedestrian level on a site may vary due to the complex interaction of wind and the built environment. For example, if winds approach a site from the westerly directions and intercept the broad facade of a building taller than its nearby surroundings, winds have the potential to descend in a downwashing flow pattern towards grade and be redirected to flow north / south at street level.

While on-site measurements could be taken at any project site using an anemometer to get a sense of wind conditions, the siting of such a measurement device must take into consideration the following variables:

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- Positioned at a location which is unable to be interfered with by pedestrians etc.
- Mounted at a location out of the influence of any localized building effects or acceleration. If installed in close proximity to a building corner, wind speeds recorded may be higher and not a good indication of the overall winds in the area.
- In order to appropriately draw conclusions relating to average wind speeds or other trends in wind data, recordings should be taken for a significant period of time (i.e., 3-5 years). Sampling for shorter durations may be biased towards wind events from a discrete set of directions and magnitudes.

The methodology associated with transposing wind data from a meteorological source (typically recorded on an anemometer at a height of 33ft on an exposed / open surrounding terrain) to the pedestrian level at a project site (typically embedded within a more built up suburban environment) is a highly technical and well-defined practice. CPP has conducted the appropriate statistical analyses for this data set. The following describes the completeness, validity and limitations of the various wind climate sources referenced for CPP's assessment:

San Francisco International Airport (SFO)

- A complete hourly meteorological data set of good quality is available (2005-2020).
- The airport is located approximately 12 miles south-southeast of the project site and along the east shores of the San Francisco Bay. As such, the wind directionality recorded at the airport may be slightly askew from the winds that occur at the project site due to various topographical features.

San Francisco Old Federal Building

- Wind data recorded on the roof of the Old Federal Building (located at 50 United Nations Plaza approximately 1 mile southeast of the project site) from 1945-1948.
- Relatively incomplete / sparse dataset with readings not taken hourly.
- This anemometer is sited in close proximity to downtown San Francisco and therefore may be influenced by the built environment nearby (especially in the present comparatively to when the readings were taken in the 40's).
- Wind data from the Old Federal Building is often referenced for developments in San Francisco subject to the San Francisco Planning Code requirements.

San Francisco Wind Climatology Study ("Orange" Zone)

- Due to the distinctive topography of the San Francisco area, five (5) wind zones demonstrating similar characteristics of wind speed and directionality were derived from a detailed Weather Research Forecasting (WRF) model to provide a standardized statistical representation of the San Francisco area wind climate to be used for the assessment of winds for developments within the City.
- The proposed development is located in the "Orange" zone and was evaluated accordingly.
- This wind data is widely accessible and more reliable than the wind frequency and direction information derived from data measured at the Old Federal Building that has historically been leveraged.

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Conclusion

CPP has conducted comprehensive qualitative assessments of the 2395 Sacramento Street development taking into consideration the buildings' geometry and orientation relative to the local wind climate (referenced from numerous reputable and well vetted wind data sources), leveraging our experience and engineering judgement as gained through extensive wind engineering consultation for projects in the San Francisco area.

It is our opinion that the addition of the proposed 2395 Sacramento Street development is not expected to adversely alter the wind conditions around the project site and wind conditions are to remain similar to existing conditions.

On behalf of CPP, INCORPORATED,

Kevin Bauman, P.Eng.
Senior Engineer

Albert Brooks, M.A.Sc., P.Eng.
Associate Principal

Jon Galsworthy, PhD., PE
Managing Director

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Planning Dept Appeal Response
Attachment E

2395 Sacramento Street Shadow Fan

August 24, 2022

Preliminary Shadow Fan
2395 Sacramento Street - 125 Feet in Height
Case No. 2022-004172ENV

San Francisco Planning

24 August, 2022

0 250 500 1,000 Feet