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June 26, 2023

By Email

President Aaron Peskin and
San Francisco Board of Supervisors
Angela Calvillo, Clerk of the Board
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102-4689
bos.legislation@sfgov.org

Lisa Gibson, Environmental Review Officer
San Francisco Planning Department
49 S. Van Ness Ave, Suite 1400
San Francisco, CA 94103
lisa.gibson@sfgov.org


**Re: Supplemental Expert Comment for Categorical Exemption for the
1151 Washington Street Project (2022-010833ENV; 2022-010833CUA)**

Board of Supervisors Hearing Date: June 27, 2023

Dear President Peskin and Honorable San Francisco Board of Supervisors:

This letter is filed on behalf of the Upper Chinatown Neighborhood Association (“UCNA”) and Clayton Timbrell (“Appellants”) concerning the proposed project at 1151 Washington Street (“Project”). Attached hereto, we submit the comments of licensed architect Robert Baum, AIA, in response to the letter filed by the Planning Department on June 16, 2023. Mr. Baum concludes that the proposed Project has a highly unusual design that results in public health and safety risks due to fire safety hazards. We urge the Board to reject the CEQA Categorical Exemption and require analysis of the Project in a CEQA document to analyze and mitigate the fire safety risks created by the Project’s unusual design. Thank you.

Sincerely,



Richard Drury
LOZEAU | DRURY LLP

Cc: President Aaron Peskin (Aaron.Peskin@sfgov.org)
Sup. Connie Chan (ChanStaff@sfgov.org)
Sup. Matt Dorsey (DorseyStaff@sfgov.org)
Sup. Joel Engardio (EngardioStaff@sfgov.org)
Sup. Rafael Mandelman (MandelmanStaff@sfgov.org)

Sup. Myrna Melgar (MelgarStaff@sfgov.org)
Sup. Dean Preston (Dean.Preston@sfgov.org)
Sup. Hillary Ronen (Hillary.Ronen@sfgov.org)
Sup. Ahsha Safai (Ahsha.Safai@sfgov.org)
Sup. Catherine Stefani (Catherine.Stefani@sfgov.org)
Sup. Shamann Walton (Shamann.Walton@sfgov.org)

23 June 2023

Board President Peskin
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244,
San Francisco, CA 94102

**Re: 1151 Washington Street CUA Appeal – June 27, 2023 Hearing/
Fire-Life Safety Concerns**

Dear President Peskin and Members of the Board:

Previously, I have written to express my concerns about what I believe are the significant Fire/Life Safety deficiencies of the Approved Design for 1151 Washington Street. As part of my review, in addition to applying my own considerable experience—I have been a licensed Architect in California since 1979—I consulted with Robert Burt, a Registered Professional Fire Protection Engineer. At that time, I submitted Robert's review and analysis (attached here again).

Recently, I became aware of Mark Macy's response (dated 19 April 2023) to my concerns and to Robert's letter. I shared Macy's letter with Robert and with several other code experts. The following summarizes the comments which I have received:

- The proposed design is quite unusual. None of the code consultants were aware of a situation in which a residential building in San Francisco relied on a similar exiting and rescue system. They felt that placing a ladder longitudinally within the Exit Discharge presents particular challenges, in that it narrows what is the single path of egress in an emergency. It's my understanding that these ladders are very heavy and require multiple firefighters to erect them. Compounding the problem is that there are approximately 45 steps within the Exit Discharge. Furthermore, neither they nor I have seen the *Projecting Ladder Rests* utilized previously.
 - Per 2022 SFBC Section 1032.3, "A means of egress shall be free from obstructions that would prevent its use..."
 - Per the SF Truck and Ladder Manual, it is the policy to avoid placing ladders "in front of entrances and exits where ingress and egress might be obstructed."
- Robert Burt continues to assert that the 125' limit applies to the Exit Discharge, and that the proposed configuration, which is 138' long, is non-compliant. Frankly, it defies common sense that there would be no limit on this distance, especially given that there is only one way out.
- In addition to concerns voiced previously, the following was also noted:
 - The utilization of spiral stairways within nine of the units, connecting four stories and an occupied roof, further diminishes the life safety protection of this design. The potential for falls (during an emergency and otherwise) and the inability to bring a stretcher up the stairways—no elevators are provided—in a medical emergency are two issues which were cited.

To summarize, the proposed design is--in the opinion of multiple professional experts—unusual. And it would create a public health and safety risk. Further study is imperative to avoid constructing a building which does not afford the highest level of life safety, both for the new dwelling units and for adjacent homes.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'Robert Baum', with a long horizontal stroke extending to the right.

Robert Baum
CA License No. C12094

cc: Supervisors Chan, Stefani, Engardio, Preston, Dorsey, Melgar, Mandelman, Ronen, Walton, and Safai

Attached: Letter from Robert E. Burt, dated April 17, 2023