File No. 210275 **Committee Item No.** _____
Board Item No. 17

COMMITTEE/BOARD OF SUPERVISORS

AGENDA PACKET CONTENTS LIST

Committee: _____ **Date:** _____
Board of Supervisors Meeting **Date:** April 20, 2021

Cmte Board

Cmte	Board	
☐	☐	**Motion**
☐	☐	**Resolution**
☐	☐	**Ordinance**
☐	☐	**Legislative Digest**
☐	☐	**Budget and Legislative Analyst Report**
☐	☐	**Youth Commission Report**
☐	☒	**Introduction Form**
☐	☐	**Department/Agency Cover Letter and/or Report**
☐	☐	**MOU**
☐	☐	**Grant Information Form**
☐	☐	**Grant Budget**
☐	☐	**Subcontract Budget**
☐	☐	**Contract/Agreement**
☐	☐	**Form 126 – Ethics Commission**
☐	☐	**Award Letter**
☐	☐	**Application**
☐	☒	**Public Correspondence**

OTHER

☐	☒	Appeal Letter - 3/5/21
☐	☒	Appellant Supplemental Info - 4/15/21
☐	☒	Planning Department Response - 4/12/21
☐	☒	Project Sponsor Brief - 4/9/21
☐	☒	Public Hearing Notice - 4/6/21
☐	☒	Clerical Documents
☐	☐	
☐	☐	

Prepared by: Lisa Lew **Date:** April 16, 2021
Prepared by: _____ **Date:** _____

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March 5, 2021

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

RE: Notice of Appeal and Appeal of San Francisco Planning Department's Second CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Dear Ms. Calvillo:

PLEASE TAKE NOTICE THAT, on behalf of the GGV Library Friends ("Appellants"), this letter appeals the San Francisco Planning Department's issuance of a **second** categorical exemption from the California Environmental Quality Act ("CEQA") for the above referenced matter.[1] Specifically, this appeal arises from the Planning Commission's February 4, 2021 approval of a Class 1 categorical exemption determination for a project that remains in violation of CEQA.[2] GGV Library Friends is an association of neighbors who live near, utilize and seek to protect the Golden Gate Valley Branch of the San Francisco Public Library ("Library").

I. Introduction

Appellants seek relief for a **second time** because the Planning Department acted in direct violation of the Board's 2020 unanimous finding that "a categorical exemption cannot be relied upon to approve a project that ***may*** have an impact on a historic resource."[3] Specifically, the

[1] This appeal is filed pursuant to San Francisco Administrative Code section 31.16.
[2] Class 1 categorical exemptions are allowed for interior and exterior alterations under 10,000 square-feet that can be shown to not have significant effects on the environment. CEQA § 21084(a).
[3] Motion No M20-129, File No. 201076, at p. 3 (Sept. 22, 2020) (emphasis added).

Board directed the Planning Department "to analyze the potential historic resource impacts of the Project on the character-defining features of the adjacent Golden Gate Valley Branch Library."[4] In the course of this process, the Planning Department sponsored two analyses: (1) An assessment of the project's impacts on the Library's interior light; and, (2) a shading analysis of the Library's photovoltaic system. Both analyses show the project ***would*** have negative impacts on the Library. Therefore, the only issue is the severity of those impacts. Nevertheless, the Planning Department issued a second exemption to CEQA. Because the dispute centers on the severity of the impacts and not their mere existence, relying on a CEQA exemption is illegal.

II. Background

Bear in mind it is a group of neighbors and Library supporters appealing the Planning Department's decision in order to protect a neighborhood library. The community has come together not to protect property values or other private interests, but to stand up for a cherished public resource in an instance when the City itself has chosen not to.

A. Project Description

1. Golden Gate Valley Branch of the San Francisco Public Library

Since May of 1918, the Golden Gate Valley Library has served residents of the Golden Gate Valley, Cow Hollow, and Marina neighborhoods.[5] The brick and terra cotta Beaux-Arts structure was designed in the shape of a basilica by famed local architect Ernest Coxhead.[6] The grand scale of the Library's interior was designed with windows on all sides, clearly intending to maximize light into the main reading room. There is no dispute that the Library is an historic resource.[7]

The Library underwent significant renovation in 2012 to achieve LEED Gold certification with major infrastructure improvements, such as photovoltaic roof panels, as well as improvements of the facility for public use. These upgrades were accomplished at great taxpayer expense, costing $8.5 million, in addition to significant private contributions by residents in the

[4] Id. at p. 4.
[5] https://sfpl.org/locations/golden-gate-valley/golden-gate-valley-library-history.
[6] Id.
[7] Motion No M20-129 at p. 2.

neighborhood. The building has new south facing high performance windows controlling solar heat exchange and a new photovoltaic system on the south facing roof providing 25% of the library's energy needs.

The Library renovation project received a number of architectural awards and accolades including: a 2012 American Institute of Architects California Council Honor Award for Architecture, a 2012 California Preservation Foundation Honor Award for Rehabilitation. and a 2012 American Institute of Architecture Honor Award for Historic Preservation.

2. The Proposed Project

2651-2653 Octavia Street is in the Pacific Heights neighborhood. The project's parcel is approximately 3,100-square-feet and is currently occupied by a two-family residence built in 1950. The proposed project would add a fourth-floor-level vertical and horizontal addition to the existing 37-foot-tall, three-story, 4,151-gross-square-foot two-family residence. The final project would be 40- feet tall, plus a 3.5-foot-tall parapet and guardrail on the roof deck, with a penthouse elevator structure in a four-story, 6,512 square-foot two family residence. The project would greatly increase the height, bulk and square-footage on this small parcel immediately adjacent to the library, to the south.

B. Procedural Background

- On September 5, 2019, the Planning Department issued its first categorical exemption for the project.
- On February 6, 2020 the Planning Commission denied discretionary review on the first categorical exemption.
- On July 28, 2020 the Board of Supervisors reversed the Planning Commission's denial of discretionary review and approval of the CEQA exemption, sending it back to the Planning Department.
- On January 26, 2021, the Planning Department re-issued the categorical exemption determination and attached a daylight impact report and shading analysis.
- On February 4, 2021, the Planning Commission again denied discretionary review and approved the CEQA exemption.

II. Grounds for Appeal: The California Environmental Quality Act

The project is not eligible for a Class 1 categorical exemption under CEQA for two reasons: first, the record is clear that the proposed project may impact an **historic resource**; and second, the project would reduce the effectiveness of the **Library's photovoltaic system** in violation of numerous governmental policies. Therefore, the Planning Department must investigate and disclose whether the proposed fourth-floor vertical and horizontal additions would reduce interior light inside the Library, a character-defining feature, and decrease the effectiveness of the Library's photovoltaic system.

It is axiomatic that public agencies utilizing CEQA exemptions must support their determination that a particular project is exempt with substantial evidence that supports each element of the invoked exemption.[8] A court will reverse an agency's use of an exemption if the court finds evidence a project may have an adverse impact on the environment.[9] The 'foremost principle' in interpreting CEQA is that it must be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.[10] CEQA requires agencies to conduct a three-tier process to ensure that the environmental consequences of their decisions are fully considered.[11] The first tier is jurisdictional, requiring an agency to complete a preliminary review to determine whether an activity is subject to CEQA.[12] An activity that is not a "project" is not subject to CEQA.[13] The second-tier concerns exemptions from CEQA review, both statutory and categorical.[14] If a project does not fall within an exemption, the agency must "conduct an initial study to determine if the project may have a significant effect on the environment."[15]

If there exists "no substantial evidence that the project or any of its aspects may cause a significant effect on the environment," the agency prepares a "negative declaration" that briefly describes the reasons supporting its determination.[16] CEQA's third tier applies if the agency

[8] CEQA § 21168.5.
[9] *Dunn Edwards Corp. v. Bay Area Air Quality Management Dist.* (1992) 9 Cal.App.4th 644, 656.
[10] *Communities for a Better Env't v. Cal. Resources Agency* (2002) 103 Cal.App.4th 98, 109.
[11] *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 74.
[12] CEQA Guidelines, § 15060; see Pub. Resources Code, § 21065.
[13] Public Resources Code (see § 21065.
[14] Pub. Resources Code, § 21080(b)(1) (2).
[15] CEQA Guidelines, § 15063(a).
[16] Id., §§ 15063(b)(2);15070.

determines substantial evidence exists that an aspect of the project may cause a significant effect on the environment. In that event, the agency must prepare a full environmental impact report. The evidence shows that the proposed additions to 2651-2653 Octavia would block light from the south, undermining natural light to the library, rendering the solar panels and windows much less effective.

A. There is evidence the proposed project may cause significant impacts to an historic resource.

To assist with CEQA compliance for the protection of historic resources, San Francisco adopted Preservation Bulletin No. 16 (the "Bulletin"). The Bulletin sets out a two-step process for evaluating proposed projects that may impact historical resources. First, a Preservation Planner determines whether the property is an historical resource as defined by CEQA Guidelines Section 15064.5(a)(3); and, second, if the property is an historical resource, it then evaluates whether the proposed action or project would cause a "substantial adverse change" to the historical resource.[17]

For the first question, there is no dispute the Library is an historic resource.[18] As to the second question, CEQA defines a "substantial adverse change" as the physical demolition, destruction, relocation or alteration of the historical resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. CEQA goes on to define "materially impaired" as work that materially alters, in an adverse manner, those physical characteristics that convey the resource's historical significance and justify its inclusion in the California Register of Historic Places, a local register of historical resources, or an historical resource survey.[19]

The grand scale of the Library's interior was designed with large windows on all sides, clearly intending to maximize natural light into the main and other reading rooms. As it stands, 2651-2653 Octavia already blocks natural light into the Library's south-facing windows. This problem cannot be compounded, because **it cannot be overstated how important indoor natural light is to any library**, especially one over a century old.

[17] San Francisco Preservation Bulletin No. 16, at p. 2.
[18] Motion No M20-129, at p. 3.
[19] CEQA Guidelines 15064.5(b), Bulletin 16, p. 9.

The Planning Department sought to dodge the interior natural light issue entirely by asserting that no historic resource analysis was required because “indoor light levels are not character defining features of any of the six Carnegie libraries that have been landmarked in San Francisco.”[20] The Planning Department made this claim because natural light was not specifically enumerated as a character-defining feature. But this assertion is wrong for at least three connected reasons:

First, if natural light was not listed as a character defining feature for the Carnegie libraries, it was an oversight, but reasonable because character defining features are typically material or physical features. Conversely, nonmaterial, nonphysical features like natural light are not generally enumerated. But just because natural light was not listed does not mean it is not a character defining feature of this library.

Second, when the Library was built in 1918, electric light was expensive and less efficient. This condition applied to all buildings at the time, and for many building types the provision of natural light was a fundamental organizing feature of the design. For example, libraries were symbols of building types with good natural light, both for the functional illumination of reading materials and for the philosophical association of light with truth. A dark library or a library with shadowy interiors was unheard of. Other examples of natural light being integral to design in the early twentieth century were factories at the time called "daylight factories," with skeletal frames and large glass window surfaces. Hospitals were designed in the pavilion plan with narrow, linear wings designed to admit a maximum of light and air. Operating rooms were designed with skylights and reflecting surfaces to maximize light and visibility while minimizing shadows. In short, during the period when the Library was built, public spaces relied on well-designed windows to maximize natural light as a central principle, not an afterthought.

Third, the Library was designed with windows on four sides to provide a maximum of natural light at all times of the day. To obstruct natural light would alter the building just as much as if it were physically altered. Blocking natural light now would diminish the significant historic character of the building. Imagine if a new building were proposed that blocked the stained-glass windows in Grace Cathedral. Or imagine if San Francisco City Hall became

[20] Categorical Exemption exhibit, at p. 3.

hemmed in by new construction such that the light inside the dome was diminished. It would be obvious to all that a "character defining feature" of those buildings was harmed and such new construction would not be permitted.

The notion that the Planning Department is powerless to regulate new construction projects in a manner that would be protective of treasured public spaces like libraries is absurd on its face. The department chose to narrowly interpret the Secretary of Interior's Standards for Rehabilitation to greenlight private development at the expense of a public library.

Finally, the foregoing is important because the Planning Department admits the Library's natural light will be diminished in the south facing windows. In the northern hemisphere south facing windows provide more light than from windows from any other direction at all times of the year. This Board ordered the Planning Department to "analyze the potential historic resource impacts of the Project on the character-defining features" of the Library. In response, the Planning Department's own analyses admitted the Library's natural light would be impaired: The "proposed project may have the potential to reduce light to some of the half windows at the south elevation of the library."[21]

Rather than prepare a legally-required CEQA analysis, the Planning Department attacked the idea that natural light is an essential component of an historic public library. It is inescapable that CEQA required the Planning Department to prepare an environmental analysis for public review and comment. Under CEQA, "It is the possibility of a significant effect … which is at issue, not a determination of the actual effect, which would be the subject of negative declaration or an EIR."[22] Put differently, "the determination of the applicability of an exemption must be made before environmental evaluation."[23] Here, once the Planning Department provided environmental analysis showing an effect on the Library, it could not continue to unlawfully exempt the project from CEQA.

The Planning Department is required to fully investigate and then disclose to the public in a CEQA document that analyzes whether there are feasible project alternatives or mitigation

[21] Categorical Exemption exhibit, at p. 2.
[22] *Azusa Land Rec. Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1200.
[23] Id.

measures that would not degrade the significance of this historical library. The project may not be exempted from CEQA review.

B. The proposed project undermines energy services and San Francisco's clean energy goals.

The Planning Department's own study showed the proposed project would partially block the south-facing photovoltaic system on the Library's rooftop. The only issue is how severely the project would undermine the system's effectiveness. According to the department, the project would reduce solarity by an average of 5.8%.[24] However, shading would increase 69% on the panels' eastern array.

The Planning Department testified last month before the Planning Commission that the department cannot regulate new construction in order to protect municipal solar generation because "solar panels are not protected by state or local laws, doing so would allow them to act as *de facto* impediments to development." [25] But the Planning Department is not charged with making up and enforcing "*de facto* law." Instead, it must adhere to local and state laws as codified. City agencies "must enforce the law which is in effect at the time in which the permit is issued,"[26] and exercise that authority "within the bounds of the statutes, code sections and ordinances that are applicable to the circumstances and facts of any matter which comes before it."[27] In short, the Planning Department is not free to implement either *de facto* or future law regarding rooftop photovoltaic systems, it must apply existing ordinances and policies in effect today.

The City is well aware of the need to protect existing rooftop solar, and has prepared a study with recommendations on the issue. [28] But the Planning Department is correct that there are not yet state or local laws on point to address protecting solar access. Nevertheless, federal, state and local laws and policies are all emphatic that renewable energy is a key component to

[24] Shading Analysis Report (December 1, 2019).
[25] David Winslow, principal architect, San Francisco Planning Department testifying before the San Francisco Planning Commission on Feb. 4, 2021. *See* https://sanfrancisco.granicus.com/MediaPlayer.php?view_id=20&clip_id=37723 at 1:11:54 - 1:12.
[26] *Avco Community Developers, Inc. v. South Coast Regional* (1976) 17 Cal.3d 785, 793.
[27] City and County of San Francisco v. Board of Permit Appeals (1989) 207 Cal.App.3d 1099, 1105.
[28] https://sfenvironment.org/sites/default/files/fliers/files/protecting_solar_access.pdf

stopping climate change, and rooftop solar is a proven solution in cities.[29] As shown below, the Planning Department ignored numerous San Francisco policies and ordinances that promote the City's investment in rooftop solar generation on municipal and private buildings. Worse, allowing the Planning Department to adopt a *de facto* policy that leaves rooftop solar generation vulnerable to future development would be contrary to policies approved by the City's elected officials, all of whom are working to ramp up renewable energy, with an emphasis on rooftop solar.

In 2007, San Francisco was designated by the U.S. Department of Energy as a "Solar America City" because the City was making significant progress promoting and installing solar generation through the Solar America Cities partnership.[30] According to SF Environment, "the City of San Francisco has developed a number of innovative policies and programs to move the city toward its goal of 100% renewable energy to become a cleaner, healthier and more secure city."[31] Solar energy is one of the cornerstones of the City's plan to achieve a 100% renewable electricity supply, and reduce our reliance on fossil fuels for heating.[32] To carry out these mandates, in 2017 San Francisco began requiring that all new commercial buildings less than 10 stories be constructed with solar generation.[33]

And leading by example, the City is installing roof top generation on public buildings throughout the San Francisco, including its libraries. Currently, the City operates 23 photovoltaic systems which generate approximately 8.6 MWh of renewable energy for San Francisco.[34]

Similarly, San Francisco's General Plan is replete with policies and objectives that "promote the use of renewable energy sources."[35] The General Plan's energy section is a guide for both public and private entities affecting the use of energy. San Francisco's Energy Policy

[29] See e.g., https://www.whitehouse.gov/briefing-room/statements-releases/2021/01/27/fact-sheet-president-biden-takes-executive-actions-to-tackle-the-climate-crisis-at-home-and-abroad-create-jobs-and-restore-scientific-integrity-across-federal-government/
[30] https://www.nrel.gov/docs/fy12osti/50203.pdf
[31] https://sfenvironment.org/energy/renewable-energy#:~:text=The%20City%20of%20San%20Francisco,healthier%20and%20more%20secure%20city.
[32] *See* https://sfenvironment.org/energy/renewable-energy#:~:text=The%20City%20of%20San%20Francisco,healthier%20and%20more%20secure%20city.
[33] https://www.theguardian.com/environment/2016/apr/21/san-francisco-adopts-law-requiring-solar-panels-on-all-new-buildings#:~:text=San%20Francisco%20has%20this%20week,fitted%20with%20rooftop%20solar%20panels
[34] https://sfwater.org/index.aspx?page=403
[35] https://generalplan.sfplanning.org/I6_Environmental_Protection.htm#ENV_EGY_12

was designed with four goals in mind: (l) increasing the efficiency with which energy is used locally; (2) diversifying the present balance of resource supplies to meet local energy needs; (3) fostering the economic development of energy management services and renewable energy systems; and (4) encouraging the active participation of members of the community to carry out this program.[36] More specifically:

- **General Plan Policy 16.2 - Remove obstacles to energy conservation and renewable energy systems in zoning and building codes**. This policy calls for a detailed analysis of zoning and building codes, particularly in terms of problems encountered by persons who have installed or tried to install rooftop solar.
- **General Plan Policy 16.1 – Develop land use policies that will encourage the use of renewable energy sources.** It is the San Francisco Board of Supervisors along with the Mayor's office who set land use policies related to construction activities and existing rooftop generation, not the Planning Department.

Since 1978, the state of California has protected rooftop solar generation by prohibiting shading from trees on adjacent properties from blocking a neighbor's solar access.[37] The law has been upheld by numerous state courts requiring tree owners to either remove or trim any trees that obstruct solar generation systems. It makes little sense to think that property owners are required to cut down majestic redwood trees on their land,[38] but would still have free reign to overbuild their lots and block a neighbor's solar panels unimpeded.

Federal, state and local commitments to rooftop solar as part of larger climate goals are not in question. Therefore, the City cannot sit by and do nothing when new land use issues arise that could undermine that commitment. As new photovoltaic projects come on line conflicts will arise. The City must protect its investments in renewable energy. The idea that in 2021 the City would fund and operate solar rooftop projects then do nothing to protect those same systems in the face of private expansion projects sends a message opposite of what the City has long worked to achieve for renewable energy.

[36] Id.
[37] 1978 Cal. Stat. ch. 1366.
[38] See e.g., https://www.nytimes.com/2008/04/07/science/earth/07redwood.html

In this connection, it is well-settled that under CEQA, a demonstration of a conflict with local policies indicates a potentially significant impact on the environment.[39] And when land use policies at issue were adopted to avoid or mitigate environmental effects, as they were here to mitigate climate change, applicability under the fair argument test applies with no presumption in favor of the City.[40]

Pursuant to Appendix G of the CEQA Guidelines, agencies must assess whether a project would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including a general plan, specific plan or ordinance) adopted for the purpose of avoiding or mitigating environmental effects. As the foregoing illustrates, the exemption violated this requirement. Instead, the Planning Department is making its own "de facto" policy of affirmatively disregarding the value of rooftop solar despite numerous local, state and federal policies mandating increased rooftop solar generation.

There is substantial evidence in the record showing the project presents potentially significant impacts on local land use rules and ordinances. Accordingly, the proposed project may not be exempted from CEQA. Instead, the City must prepare an environmental document that proposes feasible project alternatives and/or mitigation measures to the project that would reduce or eliminate impacts on the Library.

III. Conclusion

There is no question the proposed project violates CEQA in addition to San Francisco's Historic Resource Preservation Ordinance, the General Plan and numerous City-wide policies to address the effects of climate change through increased reliance on rooftop solar. Accordingly,

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[39] *Pocket Protectors v. Sacramento* (2005) 124 Cal.App.4th 903, 930 ("if substantial evidence supports a fair argument that the proposed project conflicts with [local] policies, this constitutes grounds for requiring an EIR.").
[40] Id. at p. 934.

for all of the factual and legal reasons described above, the San Francisco Board of Supervisors must grant the Appellants' CEQA appeal and send the project back to the Planning Department for full review under CEQA and all other applicable laws and ordinances.

THE LAW OFFICES OF GLORIA D. SMITH

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CEQA Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)
2651-2653 OCTAVIA ST		0554002
Case No.		**Permit No.**
2018-011022ENV		201808036405
■ **Addition/ Alteration**	☐ **Demolition (requires HRE for Category B Building)**	☐ **New Construction**

Project description for Planning Department approval.

The proposed project would construct a fourth-floor-level vertical and horizontal addition to an existing 37-foot-tall (inclusive of a seven-foot-tall mansard roof), three-story, 4,151-gross-square-foot two-family residence constructed in 1950, resulting in a 40-foot-tall (exclusive of a 3.5-foot-tall parapet and clear glass guardrail on the roof deck), four-story, 6,512-gross-square-foot two family residence.

The project construction would involve localized excavation for new foundation and possible excavation to replace existing foundations in kind, resulting in a total of approximately 15 to 30 cubic yards of soil excavated. The average depth of excavation would be 1.5 feet, with a maximum depth of 2 feet.

STEP 1: EXEMPTION TYPE

The project has been determined to be exempt under the California Environmental Quality Act (CEQA).

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

STEP 2: ENVIRONMENTAL SCREENING ASSESSMENT

TO BE COMPLETED BY PROJECT PLANNER

☐	**Air Quality:** Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities within an Air Pollution Exposure Zone? Does the project have the potential to emit substantial pollutant concentrations (e.g. use of diesel construction equipment, backup diesel generators, heavy industry, diesel trucks, etc.)? (*refer to The Environmental Information tab on the San Francisco Property Information Map)*
☐	**Hazardous Materials:** If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? **Note that a categorical exemption shall not be issued for a project located on the Cortese List** *if box is checked, note below whether the applicant has enrolled in or received a waiver from the San Francisco Department of Public Health (DPH) Maher program, or if Environmental Planning staff has determined that hazardous material effects would be less than significant. (refer to The Environmental Information tab on the San Francisco Property Information Map)*
☐	**Transportation:** Does the project involve a child care facility or school with 30 or more students, or a location 1,500 sq. ft. or greater? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities?
☐	**Archeological Resources:** Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non-archeological sensitive area? If yes, archeology review is required.
☐	**Subdivision/Lot Line Adjustment:** Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? (*refer to The Environmental Information tab on the San Francisco Property Information Map*) **If box is checked, Environmental Planning must issue the exemption.**
☐	**Average Slope of Parcel = or > 25%, or site is in Edgehill Slope Protection Area or Northwest Mt. Sutro Slope Protection Area:** Does the project involve any of the following: (1) New building construction, except one-story storage or utility occupancy, (2) horizontal additions, if the footprint area increases more than 50%, or (3) horizontal and vertical additions increase more than 500 square feet of new projected roof area? (*refer to The Environmental Planning tab on the San Francisco Property Information Map*) **If box is checked, a geotechnical report is likely required and Environmental Planning must issue the exemption.**
☐	**Seismic Hazard:** ☐ **Landslide or** ☐ **Liquefaction Hazard Zone:** Does the project involve any of the following: (1) New building construction, except one-story storage or utility occupancy, (2) horizontal additions, if the footprint area increases more than 50%, (3) horizontal and vertical additions increase more than 500 square feet of new projected roof area, or (4) grading performed at a site in the landslide hazard zone? *(refer to The Environmental tab on the San Francisco Property Information Map)* **If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption.**
Comments and Planner Signature (*optional*):	

STEP 3: PROPERTY STATUS - HISTORIC RESOURCE

TO BE COMPLETED BY PROJECT PLANNER

PROPERTY IS ONE OF THE FOLLOWING: *(refer to Property Information Map)*	
☐	**Category A:** Known Historical Resource. **GO TO STEP 5.**
■	**Category B:** Potential Historical Resource (over 45 years of age). **GO TO STEP 4.**
☐	**Category C:** Not a Historical Resource or Not Age Eligible (under 45 years of age). **GO TO STEP 6.**

STEP 4: PROPOSED WORK CHECKLIST

TO BE COMPLETED BY PROJECT PLANNER

Check all that apply to the project.	
☐	1. **Change of use and new construction.** Tenant improvements not included.
☐	2. **Regular maintenance or repair** to correct or repair deterioration, decay, or damage to building.
☐	3. **Window replacement** that meets the Department's *Window Replacement Standards*. Does not include storefront window alterations.
☐	4. **Garage work.** A new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
☐	5. **Deck, terrace construction, or fences** not visible from any immediately adjacent public right-of-way.
☐	6. **Mechanical equipment installation** that is not visible from any immediately adjacent public right-of-way.
☐	7. **Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows*.
☐	8. **Addition(s)** that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.
Note: Project Planner must check box below before proceeding.	
■	Project is not listed. **GO TO STEP 5.**
☐	Project **does not conform** to the scopes of work. **GO TO STEP 5**.
☐	Project involves **four or more** work descriptions. **GO TO STEP 5.**
☐	Project involves **less than four** work descriptions. **GO TO STEP 6.**

STEP 5: ADVANCED HISTORICAL REVIEW

TO BE COMPLETED BY PRESERVATION PLANNER

Check all that apply to the project.	
☐	1. **Reclassification of property status**. *(Attach HRER Part I)* ☐ Reclassify to Category A a. Per HRER b. Other *(specify)*: ☐ Reclassify to Category C *(No further historic review)*
☐	2. Project involves a **known historical resource (CEQA Category A)** as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.
☐	3. **Interior alterations to publicly accessible spaces that do not** remove, alter, or obscure **character defining features**.
☐	4. **Window replacement** of original/historic windows that are not "in-kind" but are consistent with existing historic character.
☐	5. **Façade/storefront alterations** that do not remove, alter, or obscure character-defining features.

☐	6. **Raising the building** in a manner that does not remove, alter, or obscure character-defining features.
☐	7. **Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.
■	8. **Work consistent** with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (*Analysis required*): See the attached preservation review memo for historic resource analysis of the subject property and the adjacent Golden Gate Valley Branch Library.
☐	9. **Work compatible** with a historic district (Analysis required):
☐	10. **Work that would not materially impair** a historic resource (Attach HRER Part II).
	Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST sign below.
■	**Project can proceed with exemption review**. The project has been reviewed by the Preservation Planner and can proceed with exemption review. **GO TO STEP 6.**
Comments (*optional*):	
Preservation Planner Signature:	Allison Vanderslice

STEP 6: EXEMPTION DETERMINATION

TO BE COMPLETED BY PROJECT PLANNER

■	**No further environmental review is required. The project is exempt under CEQA. There are no unusual circumstances that would result in a reasonable possibility of a significant effect.**	
	Project Approval Action: Planning Commission discretionary review decision	**Signature:** Kei Zushi 01/27/2021
	Once signed or stamped and dated, this document constitutes an exemption pursuant to CEQA Guidelines and Chapter 31of the Administrative Code. In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination to the Board of Supervisors can only be filed within 30 days of the project receiving the approval action. Please note that other approval actions may be required for the project. Please contact the assigned planner for these approvals.	

STEP 7: MODIFICATION OF A CEQA EXEMPT PROJECT

TO BE COMPLETED BY PROJECT PLANNER

In accordance with Chapter 31 of the San Francisco Administrative Code, when a California Environmental Quality Act (CEQA) exempt project changes after the Approval Action and requires a subsequent approval, the Environmental Review Officer (or his or her designee) must determine whether the proposed change constitutes a substantial modification of that project. This checklist shall be used to determine whether the proposed changes to the approved project would constitute a "substantial modification" and, therefore, be subject to additional environmental review pursuant to CEQA.

MODIFIED PROJECT DESCRIPTION

Modified Project Description:

DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

Compared to the approved project, would the modified project:	
☐	Result in expansion of the building envelope, as defined in the Planning Code;
☐	Result in the change of use that would require public notice under Planning Code Sections 311 or 312;
☐	Result in demolition as defined under Planning Code Section 317 or 19005(f)?
☐	Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption?
If at least one of the above boxes is checked, further environmental review is required.	

DETERMINATION OF NO SUBSTANTIAL MODIFICATION

☐	The proposed modification would not result in any of the above changes.

If this box is checked, the proposed modifications are exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice. In accordance with Chapter 31, Sec 31.08j of the San Francisco Administrative Code, an appeal of this determination can be filed to the Environmental Review Officer within 10 days of posting of this determination.

Planner Name:	**Date:**

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
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Historic Preservation Review Memorandum

2651-2653 Octavia Street (PLANNING CASE NO. 2018-011022ENV)
Prepared By Allison Vanderslice, CEQA Cultural Resources Team Manager, on January 26, 2021

Introduction

The San Francisco Planning Department (the planning department) published a Categorical Exemption for the proposed project on September 5, 2019 (Planning Department Case No. 2018-011022PRJ). The Categorical Exemption was appealed and heard by the Board of Supervisors (the board) on July 28, 2020. The board upheld the appeal and on September 22, 2020 approved Motion No. M20-129, which stated, "[T]he Planning Department did not document that it analyzed the potential impacts of the Project on the character-defining features of the adjacent Golden Gate Valley Branch Library, a Category A Known Historic Resource, prior to issuing the Categorical Exemption Determination . . . The Board directs the Planning Department to analyze the potential historic resource impacts of the Project on the character-defining features of the adjacent Golden Gate Valley Branch Library – specifically, to consider whether the potential impacts of the Project on the lighting inside the library's main reading room would significantly impact those character defining features." Accordingly, the planning department has prepared this memo to evaluate the potential impacts on historic resources that could result from the 2651-2653 Octavia Street project.

No changes have been made to the scope of the proposed project since the appeal hearing before the board on July 28, 2020.

Background

Before the planning department issued the September 5, 2019 Categorical Exemption for this project (Planning Department Case No. 2018-011022PRJ), several rounds of design revisions were made at the direction of planning department preservation staff. Based on these design revisions, the planning department preservation staff determined that the proposed alteration including both a horizontal and vertical addition at 2651-2653 Octavia Street would be minimally visible and meet the Secretary of the Interior's Standards for Rehabilitation (Secretary's Standards). This review took into account the subject property and its environment, including the adjacent Golden Gate Valley Library located at 1801 Green Street, an individually-eligible historic resource. This determination is documented in this memo.

Based on the planning department process, as the project was found to meet the Secretary's Standards, an historic resource evaluation of the subject property is not required and the need for a Historic Resource Determination (HRD) or Historic Resource Evaluation (HRE) was not triggered.

Before the planning department issued the September 5, 2019 Categorical Exemption for this project (Planning Department Case No. 2018-011022PRJ), the project sponsor worked with planning department staff to revise the proposal to avoid removal of historic materials and alteration of features that characterize the property and its

environment. As originally designed, the project proposed to remove the mansard roof, false parapet, and stucco quoining and construct a rooftop addition with decks at the third and fourth story roofs. Based on staff recommendations and multiple design meetings with the project sponsor, the proposal was revised to retain the mansard roof, false parapet, and stucco quoining, and have a compatible fenestration pattern on the visible portion of the north elevation. In addition, the revised proposal reduced the mass of the rooftop addition and set it back by 15 feet from the front elevation and also set it back at the rear elevation, eliminated the third-story roof deck and set back, and reduced the size of the fourth-story roof deck.

The Golden Gate Valley Library is directly adjacent to 2651-2653 Octavia Street and stands at the corner of Octavia and Green streets. The main reading room in the Golden Gate Valley Library is contained in the one-story plus high basement portion of the building and fronts on both Octavia and Green streets. The library also has a one-story, flat roofed portion at the south elevation. This one-story portion helps to protect the historic integrity of the library from the mass of the proposed rooftop and rear additions to the existing residence at the subject property by providing a separation between the subject property and the main volume of the library.

This separation minimizes the effect of the proposed rooftop and rear additions on the amount of available light to the reading room. There are four full height windows and one half size window at the north elevation of the reading room. The west elevation has one full height window and the east elevation has three full height windows. The south elevation has four half size windows. The proposed project may have the potential to reduce light to some of the half windows at the south elevation of the library. The project will not block light to the library's windows on the east, north and west elevations, thus providing ample light to the reading room.

Project Description

The proposed project would construct a fourth-floor-level vertical and horizontal addition to an existing 37-foot-tall (inclusive of a seven-foot-tall mansard roof), three-story, 4,151-gross-square-foot two-family residence constructed in 1950, resulting in a 40-foot-tall (exclusive of a 3.5-foot-tall parapet and clear glass guardrail on the roof deck), four-story, 6,512-gross-square-foot two family residence.

Golden Gate Valley Library and Article 10 Landmarking

The Golden Gate Valley Library stands adjacent to the proposed project site at the southwest corner of Green and Octavia streets. As part of a discontiguous grouping of Carnegie libraries[1] in San Francisco, the Golden Gate Valley Library is an individually significant resource and eligible for landmarking under Article 10 of the San Francisco Planning Code. At the time the other Carnegie libraries were landmarked, the Golden Gate Valley branch was under rehabilitation. The building was proposed for landmark designation upon completion of construction activities. The planning department expects to move forward with landmarking in Summer/Fall 2021.

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[1] The San Francisco Carnegie libraries are significant for their architecture and their association with the patterns of social and cultural history of San Francisco, particularly with the contesting of political and cultural power between working class based groups and middle class based Progressives; architectural embodiment of Progressive and City Beautiful tenets of civic grandeur used as a means of social organization, particularly to the acculturation of working class and immigrant populations; architectural embodiment of the distinctive characteristics of branch libraries, especially those delineated in "Notes of the Erection of Library Buildings."

Character defining features of the six landmark-designated Carnegie libraries in San Francisco include the following:

Landmark #234, Mission Branch, 300 Bartlett Street - character defining features include exterior composition and materials, spatial volume and ornamental ceiling of the main reading room.

Landmark #235, Chinatown Branch, 1135 Powell Street - character defining features include exterior composition and materials, spatial volume, and ornamental ceiling of the main reading room.

Landmark #239, Sunset Branch, 1305 18th Avenue – character defining features include exterior composition and materials, the paneled vestibule, the spatial volume and ornamental ceiling of the main reading room, and the glazed and paneled partition between the main reading room and the children's room.

Landmark #240, Presidio Branch, 3150 Sacramento Street – character defining features include exterior composition and materials, spatial dimensions of Sacramento Street set back, the paneled vestibule, the spatial volume and ornamental ceiling of the main reading room, and the glazed and paneled partition between the main reading room and the children's room.

Landmark #247, Richmond Branch, 351 9th Avenue – character defining features include exterior composition and materials, spatial dimensions and mature palm trees of the 9th Avenue set back, paneled vestibule, and spatial volume and ornamental ceiling of the main reading room.

Landmark #259, Noe Valley Branch, 451 Jersey Street – character defining features include the exterior composition and materials, the paneled vestibule, the primary stairway, the spatial volume of the main reading room, the ornamental ceiling of the main reading room, the glazed and paneled partition between the main reading room and the children's room.

As presented above, character defining features are similar for all the Carnegie libraries. Indoor light levels are not character defining features of any of the six Carnegie libraries that have been landmarked in San Francisco. The character defining features of the Golden Gate Valley Library that would likely be included in the landmark designation are the exterior composition and materials, paneled vestibule, spatial volume and ornamental ceiling of the main reading room. The draft Landmark Designation Report for the Golden Gate Valley Branch San Francisco Public Library by Bridget Maley dated July 22, 2020[2] includes the following features to be preserved: Exterior composition and materials, especially the window pattern and terra cotta detailing; Basilica shaped-plan; Small alley at south side and courtyard at west side; West side courtyard gates of similar terra cotta material; Interior entry vestibule and stair; The spatial volume of the Main Reading Room; The ornamental ceiling of the Main Reading Room, and Built in shelving around the Main Reading Room. Notably, indoor light levels are not included as a character-defining feature in this draft designation report. Thus, it is unlikely that indoor light levels will be included as a character defining feature of the Golden Gate Valley Library in the final designation report.

[2] Bridget Maley, Draft Landmark Designation Report, Golden Gate Valley Branch, San Francisco Public Library, 1801 Green Street, San Francisco, CA, July 22, 2020, available online at https://sfplanninggis.org/PIM/.

The landmarking of the Golden Gate Valley Library would not change the planning department's review process for this project. Specifically, no Historic Preservation Commission (HPC) hearing is required to complete the planning department's environmental review for the proposed work at the 2651-2653 Octavia Street project site.

Secretary of the Interior's Standards for Rehabilitation

As discussed above, planning department preservation staff determined that the proposed project would meet the Secretary's Standards. A full analysis documenting that the proposed project complies with the Secretary's Standards is provided below. Character-defining features for the Golden Gate Valley Library in the below analysis are based on those identified in the draft landmark designation report discussed above and character-defining features identified in previous Carnegie library landmarks. The below analysis also relies upon those character defining features identified in the Department's 2008 Historic Resource Evaluation Response for the renovation of the library (Planning Department Case 2008.0239E) which included the following: the exterior composition and materials, the spatial volume of the main reading room, and the ornamental ceiling of the main reading room.

Standard 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

The subject property is a two-family residence. It is classified as a potential historic resource. The proposed project will continue the residential use of the property. The proposed project will cause minimal change to the character defining features of the subject property. The mansard roof, false parapet, quoining, and fenestration pattern will be retained. While the proposed project may reduce the amount of natural light into some of the windows on the south elevation of the Golden Gate Valley Library, the proposed project will not change the character defining features of the library because indoor light levels are not character defining features of the library. The exterior composition and materials, and interior volume and ornamental ceiling of the reading room of the library will not be impacted by the proposed project.

Even though indoor light level is not a character defining feature of the library and is therefore not a factor relevant to the determination that the proposed project would not affect the library's historical significance, a daylight impact study was prepared pursuant to the board's findings in support of its action to uphold the appeal of the prior categorical exemption. Planning department preservation and environmental planning staff reviewed the scope of the study to ensure that it would fully address the board's direction to assess the impact of the proposed project on the natural light (daylight) levels and quality at the main floor reading room of the library. The study concluded that the proposed project would not substantially reduce the visual comfort of the library's patrons.[3] Specifically, the study found that the project would reduce the library's averaged indoor illumination levels by 1.8 percent on clear days, 4 percent on overcast days, and 11.1 percent on partially-cloudy days, as compared to the existing conditions. These minimal reductions in the indoor illumination levels would not materially impair any of the character defining features of the library. The daylight impact study further states that the existing indoor illumination levels on overcast and partially-cloudy days require supplemental electrical illumination at all times to provide the necessary illumination recommended for libraries (300-500 LUX). In other words, the lights in the library already have to be turned on during overcast and partially-cloudy days, so library patrons' experience would not be substantially altered by the minimal reduction in indoor illumination levels at those times.

[3] Symphysis, Daylight Impact Analysis Report for 2651-53 Octavia Street, December 13, 2020, available online at https://sfplanninggis.org/PIM/.

Standard 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

The project sponsor worked with planning department staff to revise the proposal to avoid removal of historic materials and alteration of features that characterize the property. As originally designed, the project proposed to remove the mansard roof, false parapet, and stucco quoining and construct a rooftop addition with decks at the third- and fourth-story roofs. Based on staff recommendations and multiple design meetings with the project sponsor, the proposal was revised to retain the mansard roof, false parapet, and stucco quoining and have a compatible fenestration pattern on the visible portion of the north elevation. In addition, the revised proposal reduced the mass of the rooftop addition and set it back by 15 feet from the front elevation and also set it back at the rear elevation, eliminated the third-story roof deck and set back and reduced the size of the fourth-story roof deck. Thus, the historic character of the property is retained and preserved.

Standard 3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

The proposed project does not create a false sense of historical development, nor does it add architectural elements from other buildings.

Standard 4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Not applicable.

Standard 5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

The proposed project preserves the distinctive mansard roof, false parapet, quoining, and fenestration pattern that characterizes the property.

Standard 6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

The project proposes to replace deteriorated and incompatible vinyl windows at the front elevation with double-hung, wood-clad windows. Due to the construction date of the property and properties in the surrounding neighborhood, the property likely had double-hung, wood sash windows. The proposed windows will better match historic windows and the character of the property in design, visual qualities and materials. The use of double-hung, wood clad windows comply with the planning department's standards for window replacement.

Standard 7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Not applicable.

Standard 8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
Not applicable.

Standard 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The 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.
The proposed additions will subsume a small portion of the historic mansard roof for the rooftop addition. However, this portion of the roof is not visible from Octavia Street because it is hidden behind the front portion of the mansard and the false parapet. The majority of the mansard roof, as well as the false parapet will be retained.

The rooftop addition is set back 15 feet from the front elevation of the property. Because Octavia Street slopes downhill to the north, the rooftop addition will be minimally visible behind the library from Green Street. However, the addition is compatible with the massing, size, and scale of the subject property and adjacent buildings to the south. Even with the rooftop addition at the subject property, the height of the buildings on Octavia Street will still appear to step down to the library.

The main reading room in the library is contained in the one-story plus high basement portion of the building. The library also has a one-story, flat roofed portion at the south elevation. This one-story addition helps to protect the historic integrity of the library from the mass of the proposed rooftop and rear additions to the existing residence at the subject property by providing a separation between the subject property and the main volume of the library.

This separation minimizes the effect of the proposed rooftop and rear additions on the amount of available natural light to the library's reading room. There are four full height windows and one half size window at the north elevation of the reading room. The west elevation has one full height window and the east elevation has three full height windows. The south elevation has four half size windows. Based on the size and location of the proposed additions in relationship to the placement of the library windows, the proposed project will result in a minimal reduction of natural light levels to the library's indoor reading room as discussed above. For the same reason stated under Standard 1 above, even if indoor light levels were considered character defining features of the library, the planning department's conclusion is that there would be minimal change to the indoor light levels and that the proposed project would not result in an alteration to the indoor reading room. The project will not block light to the windows on the east, north and west elevations, thus providing ample light to the reading room.

The rear elevation of the existing residence will be removed for the proposed rear addition. The existing rear elevation is not a character defining feature. The existing rear of the building is not visible from Green Street as it is behind the library. The new rear addition may be minimally visible from Green Street. However, the additions will be clad in horizontal wood siding that is compatible with the materials of the subject property and neighborhood.

Standard 10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Given the rear elevation and flat portion of the roof will be removed for the new additions, it would be difficult to remove the new additions in the future. However, the form of the front elevation, a portion of the visible side elevation, as well as the mansard roof, false parapet, quoining, and fenestration pattern will be retained. Thus, the integrity of the visible features of the subject property would be unimpaired even if the new additions were to be removed in the future. This is because the essential form of the original footprint of the property will also be retained within the additions. The adjacent buildings and library would also be unimpaired if the additions were removed in the future.

Impact Analysis to Adjacent Resources

As discussed above, the proposed project meets the Secretary's Standards as the project will not substantially impact the proposed property, nor will it substantially impact the adjacent Golden Gate Valley Library. None of the character defining features of the Golden Gate Valley Library as defined above would be impacted by the proposal. The project will not cause any direct impacts to the adjacent resource as no work is proposed outside of the subject parcel. Additionally, the paneled vestibule, spatial volume and ornamental ceiling of the main reading room would still be visible and able to be experienced by patrons when inside the library after the completion of the proposed project. As discussed above, even if indoor light levels were considered character defining features of the library, the planning department's conclusion that the proposed project would not materially alter any of the library's character defining features would not change

In order to understand project impacts to adjacent resources, the planning department evaluates the project, focusing on setting, one of the seven aspects of historical integrity. Setting is the physical environment of a historic property. Projects can have setting impacts on adjacent resources if they will change the setting of the resources. As the library is in a residential setting and an addition to an adjacent residential property will not change the character of the residential neighborhood, the library would retain its integrity of setting.

Summary

Based on the above analysis, the project meets the Secretary's Standards and will not cause a substantial impact to the subject property and its environment, which includes the adjacent Golden Gate Valley Library and the residential character of the surrounding streets. As discussed above, the character-defining features of the library would not be materially impaired by the proposed project as the library would still be able to convey its historical significance and would retain its historical integrity, including integrity of setting.

As discussed above, planning department preservation staff determined that the proposed residential alteration project would be minimally visible and meets the Secretary's Standards. Following the planning department's normal procedures, the planning department determined that the scope of this project does not require further written analysis on the part of staff, nor does this project require additional historical information from the project sponsor or a consultant report. The landmarking of the library is currently in process, however, no additional historic preservation review process would have been required if landmarking of the library had been completed prior to review of this project.

[Findings Reversing the Categorical Exemption Determination - 2651-2653 Octavia Street]

Motion adopting findings to reverse the determination by the Planning Department that the proposed project at 2651-2653 Octavia Street is categorically exempt from further environmental review.

WHEREAS, On September 5, 2019, the Planning Department issued a CEQA Categorical Exemption Determination for the proposed project located at 2651-2653 Octavia Street (“Project”) under the California Environmental Quality Act (Public Resources Code, Section 21,000 et seq., "CEQA"), the CEQA Guidelines (California Code of Regulations, Title 14, Section 15,000 et seq.), and San Francisco Administrative Code, Chapter 31; and

WHEREAS, The project site is located on the block bounded by Green Street to the north, Octavia Street to the east, Vallejo Street to the south, and Laguna Street to the west, in the Pacific Heights neighborhood; and

WHEREAS, The approximately 3,100-square-foot project site is within the Residential, House, Two-Family (RH-2) Zoning District and a 40-X Height and Bulk District; and the project site is currently occupied by a two-family residence; and

WHEREAS, The Project includes the construction of a fourth-floor-level vertical and horizontal addition to an existing 37-foot-tall (inclusive of a 7-foot-tall mansard roof), three-story, 4,151-gross-square-foot two-family residence constructed in 1950, resulting in a 40-foot-tall (exclusive of a 3.5-foot-tall parapet and clear glass guardrail on the roof deck), four-story, 6,512-gross-square-foot two family residence; and

WHEREAS, The project construction would involve localized excavation for new foundation and possible excavation to replace existing foundations in kind, resulting in a total of approximately 15 to 30 cubic yards of soil excavated, at an average depth of 1.5 feet; and

WHEREAS, The Planning Department issued a categorical exemption for the Project on September 5, 2019, finding that the proposed project is exempt from CEQA under Section 15301 of the CEQA Guidelines, also known as a Class 1 Categorical Exemption (applicable to the alteration and addition to an existing structure) and that no further environmental review was required; and

WHEREAS, On February 6, 2020, the Planning Commission passed Discretionary Review Action DRA-683 denying a discretionary review request at a public hearing (Planning Department Case No. 2018-011022DRP), which constituted the approval action for the project under CEQA; and

WHEREAS, On March 6, 2020, Maureen Holt, Elizabeth Reilly, Paul Guermonprez, and Jack Fowler (collectively, "Appellants") filed an appeal of the September 5, 2019 categorical exemption to the board; and

WHEREAS, By memorandum to the Clerk of the Board dated March 12, 2020, the Planning Department's Environmental Review Officer determined that the appeal was timely filed; and

WHEREAS, On July 28, 2020, this Board held a duly noticed public hearing to consider the appeal of the exemption determination filed by Appellants; and

WHEREAS, The Board heard extensive testimony regarding the potential impacts of the Project on the adjacent Golden Gate Valley Branch of the San Francisco Public Library, a property listed as a Category A building (Known Historic Resource) in the Planning Department's Property Information Map; and

WHEREAS, The Golden Gate Valley Branch is one of seven branches of the San Francisco Public Library that were built in the early 20th century with funds from Andrew Carnegie; and

WHEREAS, When the San Francisco Public Library undertook its Branch Modernization Program, it committed to formally seek designation under Article 10 of the Planning Code of each of the seven Carnegie branch libraries existing in San Francisco once rehabilitation had been completed; and

WHEREAS, Today, six of the seven Carnegie branch libraries have been landmarked under Article 10, including the Mission, Chinatown, Sunset, Presidio, Richmond, and Noe Valley branches, and in each of these landmark designations, the spatial volume of the main reading room was identified as a significant character-defining feature of the building; and

WHEREAS, The landmark designation for the Golden Gate Valley Branch Library has been submitted to the Planning Department and is therefore pending, but it is possible that the library's main reading room will be found to be a significant feature, as in the case of the other Carnegie branch libraries; and

WHEREAS, Evidence and testimony presented at the hearing show that the Planning Department failed to document that it analyzed the potential impacts of the Project on the lighting inside the main reading room of the adjacent historic Golden Gate Valley Branch Library prior to issuing the Categorical Exemption Determination for the Project; and

WHEREAS, Under Section 21084 of CEQA and Sections 15064.5 and 15300.2 of the CEQA Guidelines, a categorical exemption cannot be relied upon to approve a project that may have an impact on a historic resource; and

WHEREAS, In reviewing the appeal of the exemption determination, this Board reviewed and considered the exemption determination, the appeal letter, the responses to the appeal documents that the Planning Department prepared, the other written records before the Board of Supervisors and all of the public testimony made in support of and opposed to the exemption determination appeal; and

WHEREAS, Following the conclusion of the public hearing, in Motion M20-093, the Board of Supervisors unanimously reversed the determination that the Project is categorically exempt, subject to the adoption of written findings of the Board in support of such determination based on the written record before the Board of Supervisors as well as all of the testimony at the public hearing in support of and opposed to the appeal; and

WHEREAS, The written record and oral testimony in support of and opposed to the appeal and deliberation of the oral and written testimony at the public hearing before the Board of Supervisors by all parties and the public in support of and opposed to the appeal of the exemption determination is in the Clerk of the Board of Supervisors File No. 200284, and is incorporated in this motion as though set forth in its entirety; now, therefore, be it

MOVED, That the Board of Supervisors reverses the determination by the Planning Department that the Project is categorically exempt, as the Planning Department did not document that it analyzed the potential impacts of the Project on the character-defining features of the adjacent Golden Gate Valley Branch Library, a Category A Known Historic Resource, prior to issuing the Categorical Exemption Determination; and, be it

FURTHER MOVED, That the Board directs the Planning Department to analyze the potential historic resource impacts of the Project on the character-defining features of the adjacent Golden Gate Valley Branch Library - specifically, to consider whether the potential impacts of the Project on the lighting inside the library's main reading room would significantly impact those character defining features; and, be it

FURTHER MOVED, That as to all other issues, the Board finds the Categorical Exemption Determination conforms to the requirements of CEQA and is adequate, accurate, and objective, the record does not include substantial evidence to support a fair argument that the project may have a significant effect on the environment, and no further analysis is required.

City and County of San Francisco
Tails
Motion: M20-129

City Hall
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

File Number: 201076 **Date Passed:** September 22, 2020

Motion adopting findings to reverse the determination by the Planning Department that the proposed project at 2651-2653 Octavia Street is categorically exempt from further environmental review.

September 22, 2020 Board of Supervisors - APPROVED

Ayes: 11 - Fewer, Haney, Mandelman, Mar, Peskin, Preston, Ronen, Safai, Stefani, Walton and Yee

File No. 201076

I hereby certify that the foregoing Motion was APPROVED on 9/22/2020 by the Board of Supervisors of the City and County of San Francisco.

Angela Calvillo
Clerk of the Board

MAUREEN HOLT

4783

11-4288/1210 4000

Mar 5/21
Date

Pay to the Order of San Francisco Planning Department $ 665.00

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For Case # 2018-011022PRJ

From:	BOS Legislation, (BOS)
To:	gloria@gsmithlaw.com; "jcotecook@aol.com"; ryan@zfplaw.com
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Zushi, Kei (CPC); Rosenberg, Julie (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; BOS Legislation, (BOS); Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS)
Subject:	APPELLANT SUPPLEMENTAL INFORMATION: Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Appeal Hearing April 20, 2021
Date:	Thursday, April 15, 2021 4:33:17 PM
Attachments:	image001.png

Greetings,

The Office of the Clerk of the Board received the following supplemental information from appellant Maureen Holt on behalf of GGV Library Friends, regarding the appeal of CEQA Exemption Determination for the proposed 2651-2653 Octavia Street project.

Appellant Supplemental Information - April 15, 2021

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 210275

Regards,

Lisa Lew
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.
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From: BOS Legislation, (BOS) <bos.legislation@sfgov.org>

Sent: Monday, April 12, 2021 8:59 AM
To: gloria@gsmithlaw.com; 'jcotecook@aol.com' <jcotecook@aol.com>; ryan@zfplaw.com
Cc: PEARSON, ANNE (CAT) <Anne.Pearson@sfcityatty.org>; STACY, KATE (CAT) <Kate.Stacy@sfcityatty.org>; JENSEN, KRISTEN (CAT) <Kristen.Jensen@sfcityatty.org>; RUIZ-ESQUIDE, ANDREA (CAT) <Andrea.Ruiz-Esquide@sfcityatty.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; Teague, Corey (CPC) <corey.teague@sfgov.org>; Sanchez, Scott (CPC) <scott.sanchez@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Jain, Devyani (CPC) <devyani.jain@sfgov.org>; Navarrete, Joy (CPC) <joy.navarrete@sfgov.org>; Lewis, Don (CPC) <don.lewis@sfgov.org>; Varat, Adam (CPC) <adam.varat@sfgov.org>; Sider, Dan (CPC) <dan.sider@sfgov.org>; Starr, Aaron (CPC) <aaron.starr@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Zushi, Kei (CPC) <kei.zushi@sfgov.org>; Rosenberg, Julie (BOA) <julie.rosenberg@sfgov.org>; Longaway, Alec (BOA) <alec.longaway@sfgov.org>; BOS-Supervisors <bos-supervisors@sfgov.org>; BOS-Legislative Aides <bos-legislative_aides@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Somera, Alisa (BOS) <alisa.somera@sfgov.org>; Mchugh, Eileen (BOS) <eileen.e.mchugh@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>
Subject: PROJECT SPONSOR BRIEF: Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Appeal Hearing April 20, 2021

Greetings,

The Office of the Clerk of the Board received the following response brief from the project sponsor Ryan Patterson of Zacks, Freedman & Patterson, PC, on behalf of Jane Cote-Cook, regarding the appeal of CEQA Exemption Determination for the proposed 2651-2653 Octavia Street project.

Project Sponsor Brief - April 9, 2021

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 210275

Regards,

Lisa Lew
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
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lisa.lew@sfgov.org | www.sfbos.org

From:	BOS Legislation, (BOS)
To:	Lew, Lisa (BOS)
Subject:	FW: Expert Reports For Golden Gate Valley Library Hearing
Date:	Thursday, April 15, 2021 3:37:41 PM
Attachments:	Brief Expert Bios.docx Corbett expert report GGVL.pdf 4.10.21 Letter Golden Gate Branch Library.pdf Verve light study findings.pdf Edward Dean Response GGV Library.pdf

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From: Kelly Nice <kellynice@niceandcompany.com>
Sent: Thursday, April 15, 2021 11:42 AM
To: Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>; Donovan, Dominica (BOS) <dominica.donovan@sfgov.org>
Cc: Maureen Holt <maureen@ddmhww.com>
Subject: Expert Reports For Golden Gate Valley Library Hearing

Hello Supervisor Stefani and Dominica,

Attached are the reports regarding expert opinion on the Light and Shade Impact to the Golden Gate Valley Library of the proposed project at 2651-2653 Octavia Street. Also attached are the bios of the experts. Please know that the 4 lighting and shading experts provided these opinions gratis because of their belief that the Symphysis reports conducted for the Planning Department were incomplete and misleading. It is our belief that the Planning Department did not fulfill the Board of Supervisors direction to adequately study the impact of this project on the GGV Library, but instead produced a flawed report, suppressed relevant facts and misled others as the the minimal impact of this project in their efforts to justify an unsupportable Categorical Exemption. As a local citizens group, we don't have the resources or expertise in these very complicated matters and are grateful to have several world-renowned experts volunteer to help protect the library. One note of detail for the report from Michael Corbett. On the last paragraph of page 6, expert George Loisos last name is not included. That will be corrected on the final version.

Finally, our group the Golden Gate Valley Library Friends has created a website that is getting good support from the community and is resulting in additional supporters willing to help in defense of the library. You can see it at https://saveggvlibrary.org/

Thank you.

Maureen Holt and Kelly Nice

Brief Bios: Expert Opinions for Appellant Group GGV Library Friends

1. **Michael Corbett** Well-known local expert with multiple years' experience in environmental and regulatory compliance for historic resources in San Francisco. Mr. Corbett meets the Secretary of the Interior's professional qualifications in history and architectural history, and he is the author of the book, Splendid Survivors (1979), and directed the survey on which the book was based. His work was the basis for Article 11 of the San Francisco Planning Code and for preservation features of the Downtown Plan (1986).

2. **Sean A. Timmons** of Verve Sustainable Engineering Design Studio was one of the designer engineers hired by the City for the GGV Library renovation project 2010-2012. As part of a collaboration with Tom Eliot Fisch and Paulette Taggart Architects, Mr. Timmons renovated the building with new high performance windows, and the new photovoltaic system on the roof. He is an expert in environmental master planning, economic and integrated building systems design.

3. **Edward Dean** of Bernheim & Dean is an experienced large-project architect, who specializes in low-energy building design. Dr. Dean has acted as lead designer on major projects at professionally recognized firms nationwide and has been extensively involved in the planning and renovation of city, university and private libraries and learning centers . Assistant professor of Architecture at UC Berkeley.

4 + 5. **George Loisos and Susan Ubbelohde** of Loisos & Ubbelohde. The firm has over 40 years of experience in shading and daylighting analysis and is a leading firm in the analysis of sun and daylight conditions. They have conducted research for the US Department of Energy, the California Energy Commission and Lawrence Berkeley National Lab on daylighting performance, published numerous papers on daylighting

simulation and design. Dr Ubbelohde is Professor Emerita at UC Berkeley and has taught graduate daylighting design and simulation for 27 years at UC Berkeley.

All five experts reviewed the Planning Department's two studies (1) Daylight Impact Analysis Report (December 2020) - an assessment of the project's impacts on the Library's interior light; and, (2) Shading Impact Analysis Report (December 2019) - impact of shading on the Library's photovoltaic system.

Their opinions are consistent that the project will materially reduce natural light, a character-defining feature of this historic library and increase shading on the Library's solar array, cutting off the renewable energy supply and increasing the Library's carbon footprint.

MICHAEL R. CORBETT
Architectural Historian ♦ 2161 Shattuck Avenue #203 ♦ Berkeley, California 94704 ♦ (510) 548-4123

12 April 2021

Gloria Smith
The Law Offices of Gloria D. Smith
48 Rosemont Place
San Francisco, California 94103

RE: **San Francisco Planning Department's Second CEQA Exemption for 2651-2653 Octavia Street (Case No. 2018-011022 PRJ) Regarding the Impact of the Proposed Project on the Golden Gate Valley Branch Library, A Historic Resource**

Dear Ms. Smith,

As you have requested, I am providing my review of the Categorical Exemption Determination made by the San Francisco Planning Department for a proposed project at 2651-2653 Octavia Street on 27 January 2021 and its impact on the Golden Gate Valley Branch Library, a historic resource. Information and conclusions in this letter are based on a site visit and a review of sources listed on the attached page of references. The site visit on 2 April 2021 involved viewing the structure from the outside only. Because the building is closed during the pandemic, the interior is not currently accessible. However, I have been inside the building several times in the past and for the purposes of this review have reviewed photographs of the interior taken after the renovation completed in 2012.

I make two findings in this letter. First, I demonstrate that the level and quality of natural light in the library, both functions of the architectural design, are a character defining feature of the library. Second, I show that because natural light is a character defining feature, the diminishing of natural light in the library would result in a negative impact on the library under CEQA.

QUALIFICATIONS

I am making these comments as an architectural historian with long experience in addressing the environmental and regulatory frameworks for historic resources in San Francisco. As shown in more detail on my attached resume, I meet the professional qualifications in history and architectural history established by the Secretary of the Interior. I am the author of the book, *Splendid Survivors* (1979), and director of the survey on which the book was based and that served as the basis for Article 11 of the San Francisco Planning Code and for preservation features of the Downtown Plan (1986). I am the author of the Historic Context Statement adopted by the Planning Department for Corbett Heights and for another now in review for North Beach. I am the author or co-author of National Register nominations for the Civic Center, the Uptown Tenderloin Historic District, the Port of San Francisco Embarcadero Historic District, the Jessie Street Substation, Temple Sherith Israel, the Palace of Fine Arts, and the Metropolitan Club.

Among numerous particularly relevant projects I have researched and evaluated numerous other libraries and other buildings by the architect of the Golden Gate Valley Branch Library, Ernest Coxhead. These include the 1893 Beta Theta Pi House in Berkeley designed by Ernest Coxhead and the 1908 Home Telephone Building at 333 Grant Avenue in San Francisco designed by Coxhead & Coxhead, a firm of Ernest Coxhead and his brother Almeric Coxhead. I have also written about three other Carnegie libraries, the 1900 Oakland Public Library, the 1914 Richmond Branch Library, and the 1916 San Francisco Main Library. In addition to these I have worked extensively on early twentieth century buildings for which the provision of natural light is key to their architectural designs and character. Among these are hospitals, factories, and office buildings.

I have been assisted in this effort by Mary Hardy. Mary has an M. Arch. from the University of California and an M.S. in Historic Preservation from Columbia University. She meets the professional qualifications of the Secretary of the Interior in architecture and history and has long experience in both designing according to the Secretary of the Interior's Standards and assessing compliance with the standards as part of the CEQA process. She was the principal author of a study of Coxhead's Beta Theta Pi House. Among libraries, she worked on the Berkeley Public Library.

EXISTING CONDITIONS AND THE PROPOSED PROJECT

The proposed project at 2651-2653 Octavia Street consists of an addition to an existing three-story, two-unit residence that is immediately south of the Golden Gate Valley Branch Library property at 1801 Green Street. The addition consists of an extension of the building westerly toward the rear of its lot and a new fourth floor with a roof deck.

The Golden Gate Valley Branch Library is acknowledged as a historic resource under CEQA. Among other existing and potential categories of recognition, it is eligible for landmark status under Article 10 of the Planning Code. It is one of seven branch libraries in San Francisco that have been recognized for architectural distinction and historical significance.

The proposed project would obstruct some level of natural light that currently flows into the library. The project would reduce the amount of light in the interior and would also alter the quality of interior light, because the balance of light in the library would shift more toward artificial and away from natural light.

THE PLANNING DEPARTMENT'S INTERPRETATION OF CEQA FOR THIS HISTORIC RESOURCE

In its CEQA exemption, the Planning Department determined "that the proposed project would not cause a substantial adverse change in the historic significance of the library." (SFPD 2021, Appeal p. 5) The Planning Department asserted that the "interior light level in the library's main reading room is not a character-defining feature that conveys the historic

significance of the library." (SFPD 2021, Appeal p. 7) The Planning Department cited a lack of "substantial evidence" that the light level is a character defining feature, stressing that character defining features must be physical features.

The Planning Department further reasoned that if the interior light level is not a character defining feature, the project as planned complies with the Secretary of the Interior' Standards for Rehabilitation. Therefore, changes to the light level from the project would not diminish its historic character.

THE LIBRARY BUILDING AND THE ARCHITECT

The Golden Gate Valley Branch Library was designed by Ernest Coxhead and built in 1918. Coxhead (1863-1933) was an important California architect who was born and educated in England. He was active as an architect in Los Angeles and San Francisco from the 1880s to about 1920. He is particularly noted for his residences and churches, mostly in the Arts & Crafts style. Much has been written about his skill as an architect, most notably in influential essays by David Gebhard and John Beach in a 1976 compilation, *Bay Area Houses*, edited by Sally Woodbridge. Characteristic and recurring features of his designs were his entry sequences and expressive use of light.

The library is in many respects a typical Carnegie branch library. Following both the guidelines of Carnegie program officials and the example of many other Carnegie branch libraries around the country, it is a one story building with a basement, it is long and narrow in plan, it has windows on all four sides, it is sited in its parcel to protect natural light on all sides, the bases of its main windows are six feet above the floor leaving the lower walls free for shelves and reaching up toward the light in a constricted urban location, it has a central entry on its long side, and the librarian's desk is at the center of the main space. The main space – the only space on the main floor – is a well-lit reading room which also houses shelving for books and the librarian's desk. The basement originally housed utilities, toilets, a meeting room, and a space for children.

Among these standard features of Carnegie libraries, several have to do specifically with the provision and purposes of light. The dimensions and proportions of the reading room, the placement of windows, and the siting of the building are all to maximize access to light.

In the design of a Carnegie library there were three principal components. The building itself consisted of its structural design and materials, its heating and mechanical systems, provisions for light, etc. The arrangement and furnishings of the building, the province of the librarians, included many practical details that facilitated the functioning of the building as a library. The appearance and finishes, including the architectural style of the building and its symbolism and cultural meaning were the third component.

NATURAL LIGHT IS A FEATURE, FUNCTIONAL AND SYMBOLIC, IN CARNEGIE LIBRARIES

The presence and meaning of light in this library brings together the three components of a library design. Light is a normal, practical aspect of any building. It serves the program of the library and its function. And it symbolizes the higher purpose and meaning of the library.

Andrew Carnegie's well-known efforts to build public libraries in the United States were preceded by less well-known efforts in Scotland where he was born. The first of over 2,500 libraries built by Carnegie was in his home town of Dumfermline, Scotland in 1883. Stating a basic belief of Carnegie's in this first library about his intentions was an ornamental relief sculpture over the main door consisting of a sun face with radiating lines of light and the inscription "Let There Be Light." In relation to the three components of library design, this artwork and inscription are saying that beyond the practical and administrative reasons for light in the building that the light of knowledge will inspire and elevate those who make use of the library. For Carnegie and many many other builders and users of libraries, there was a philosophical association of light with truth that was represented by the concept of libraries and by the physical libraries themselves.

Over the thirty-five years between the first Carnegie library in Scotland and the Golden Gate Valley Branch Library in San Francisco (finished one year before the last Carnegie library grant was made), the motivating idea for the Carnegie program was the bringing of the light of knowledge to the public. In skillful hands, the power of this idea, always present, was emphasized.

In the Golden Gate Valley Branch Library, Ernest Coxhead designed an entry sequence that provided an experience of literal enlightenment, in the sense that the visitor to the library becomes suddenly aware of the light filled space of the reading room at the culmination of the sequence. In the landmark nomination of the library, Bridget Maley calls out the "processional entry" as contributing "to the overall grandeur of the building." This is parallel to numerous of Coxhead's residential and church designs which utilize open and closed spaces, dark and light, and juxtapositions of scale that create a powerful architectural experience.

Approaching the building, the visitor goes toward a grand entry at the center of a wall of giant Corinthian columns. Seen in this way the building is like a classical temple, perhaps a temple of reading. The ordinary neighborhood resident enters through a doorway fit for grandeur. The wall and the entry flatter the visitor, suggesting that the building was suitable for persons of learning and culture, and promising great things inside. The exterior steps narrow as the visitor climbs, focusing attention on the door itself. Inside is an enclosed darkened vestibule and a steep stair up to the main floor. The visitor looks at their feet and holds the railing. Then at the top of the stairs, the visitor can stop and look around and behold

the great light-filled space and walls lined with books. Going from enclosed and dark to open and light, the visitor re-enacts the process of education from ignorance to knowledge.

In a more mundane but more fundamental sense, the provision of light at the time the Golden Gate Valley Branch Library was built was so integral to design that it affected all buildings. One influential writer about library design, John Cotton Dana, wrote in a book that was reprinted many times over at least fifteen years that the workshop, the factory, and the office building were appropriate models for libraries. (Dana 1910, p. 26) Each of these types had a special need for natural light at a time when electric light was expensive and inefficient.

More than any other building type, libraries are associated with good light which is necessary for finding books and for reading. But factories, hospitals, office buildings, department stores, and other types of the period all made particular accommodations for admitting natural light and, in some of these cases, imbuing it with higher meaning. A common type of factory with large areas of glass inside a structural frame was called a Daylight Factory. Hospital wards were long and narrow to provide light and air to patients in their beds. Operating room walls were clad in white reflective materials and lit from above to maximize light and visibility. Department stores were built around glass domes. Office buildings were designed in wings or around light courts to bring light into all rooms.

During the entire period of the Carnegie libraries the buildings were lit by a combination of natural and artificial light. In the beginning, gas or oil lamps and fixtures were used. By the time of the Golden Gate Valley Branch Library, electricity had long been the source of artificial light. However, even in this period, electric light was inefficient and on its own, inadequate. The dominance of natural light provided a character to interior spaces that changed in later decades as electric lighting improved. Edward Tilton, an influential and prolific architect and writer about libraries wrote of the “beautiful mellow light” in the double-height space of a library reading room like that of the Golden Gate Valley Branch Library. (quoted in Van Slyck, p. 97)

INTANGIBLE QUALITIES OF ARCHITECTURAL SIGNIFICANCE

The recognition and protection of intangible qualities has been a fundamental element of historic preservation since its inception with the National Historic Preservation Act of 1966, not even to mention the place of intangible qualities in the appreciation of art and architecture for as many millennia as these things have been appreciated.

For example, in the National Register criteria, which are the foundation of cultural resource evaluation, National Register Criterion C recognizes properties that “possess high artistic values.” (NPS Bulletin 15, p. 17) High artistic values are not the product of a list of physical features, but rather, come from the ways those features are put together and how they shape people’s experience of a place. The interactions of light, space, air, and time for someone walking through a space at different times of the day and the year in different kinds of

weather are some of the intangibles that create high artistic values and experiences of the power of architecture.

In recent decades another approach, cultural landscape analysis, has been developed and adopted for understanding and protecting cultural resources. Initially intended for landscapes as they are traditionally understood, like gardens or historic farming areas, cultural landscape analysis has come to be applied to all kinds of resources including individual buildings. In fact, one of the reasons cultural landscape analysis was widely adopted was because it helped understand and identify intangibles that were not always adequately recognized. Among thirteen types of landscape characteristics recognized by the National Park Service in a substantial literature on the subject are "Natural Features and Systems" and Spatial Organization," both of which may address the interplay of light on physical features as aspects of their significance. (NPS 1996, NPS 2021)

Thus, natural light like aesthetics, beauty, views, spatial sequence, and spatial character has a long and well-established place as a recognized element in the appreciation of architecture and in the identification of historic resources.

NATURAL LIGHT IS A CHARACTER DEFINING FEATURE OF THIS LIBRARY

Natural light in the Golden Gate Valley Branch Library is a character defining feature. Natural light was an essential and fundamental element in the design of the building for practical and symbolic reasons as demonstrated here.

The Planning Department incorrectly stated that character defining features must be physical features. However, there is no such requirement in either CEQA or the Department of the Interior's Standards for Rehabilitation, which the CEQA exemption relied upon. Indeed, the character defining features of buildings like San Francisco City Hall or Frank Lloyd Wright's V.C. Morris Store include non-physical features like the spatial volumes and quality of light as much as they do the materials of the buildings. The same is true for the Golden Gate Valley Branch Library. The amount and quality of light in the main reading room is a fundamental character defining feature of the building.

A CEQA EXEMPTION WOULD BE INAPPROPRIATE FOR THIS PROJECT

I have reviewed the reports by architectural lighting experts Sean A. Timmons of Verve Sustainable Engineering Design Studio, Edward Dean of Bernheim & Dean and George and Susan Ubbelohde of Loisos & Ubbelohde. These experts reviewed the Planning Department's analysis on whether interior natural light in the Library would be diminished by the proposed project. These four experts found that the Planning Department's analysis was flawed and that the project could diminish natural light inside the library to a harmful extent. I am not a lighting expert, nevertheless, based on the evidence from these experts, it is my opinion that were the level and quality of natural light in the Golden Gate Valley Branch

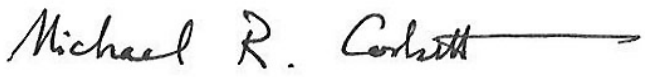
Library noticeably reduced, it would be a negative impact on a character defining feature. As such, the project would have a negative impact on an historic resource and must be fully addressed.

The Categorical Exemption Determination granted by the Planning Department should be rescinded.

SUMMARY OF FINDINGS

The Planning Department applied a flawed analysis to the question of the level and quality of light in the Golden Gate Valley Branch Library as a character defining feature. This is because it contrived a requirement that character defining features must be material or physical. This is incorrect. The finding that the light is not a character defining feature violated CEQA, common sense, cultural landscape analysis, the Secretary of the Interior's Standards, and decades of practice in the evaluation and treatment of historic resources. The Planning Department rejected the principle that the level and quality of light in the library was a character defining feature. This letter provides substantial evidence that light is a character defining feature and there is evidence that the project would diminish the natural light that enters the library. Because the project would diminish the natural light, it may have a significant impact on a historic resource. Therefore, the project is not eligible for a categorical exemption. There is nothing obscure or subtle about this issue. The level and quality of natural light in the library is a character defining feature.

Sincerely,



Michael R. Corbett

Attachments: References
Resume

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MICHAEL R. CORBETT

Architectural Historian

2161 Shattuck Ave. #203 ♦ Berkeley, CA 94704 ♦ tel (510) 548-4123 ♦ mcorbett@lmi.net

Michael R. Corbett is an architectural historian with over forty years experience in architectural history and historic preservation. Based in the San Francisco Bay Area for most of that time, Corbett has worked throughout California, the western United States, Texas, and abroad. From 1988 to 1990, he worked for the New York City Landmarks Preservation Commission. He meets the Secretary of the Interior's professional qualifications for a historian and an architectural historian (SOIS qualified).

Corbett's work principally involves research and writing about buildings and places for city landmark nominations, National Register of Historic Places applications, planning, preservation, and environmental purposes including HABS and HAER documentation. In addition, he has contributed to numerous environmental documents prepared for NEPA and CEQA purposes over many years for transportation projects, power plants, water related projects and others. He has worked with the Section 106 process on many projects.

Corbett's clients have included all branches of the military, the National Park Service, Caltrans, the University of California, the ports of Oakland and San Francisco, and the cities of Fremont, Berkeley, San Rafael, Woodside, Oakland, and San Francisco. Private clients have included PG&E, the Roman Catholic Church, the Maybeck Foundation, San Francisco Architectural Heritage, the Fine Arts Museums of San Francisco, Stanford University, numerous architectural, planning, and cultural resource firms, and many private companies and individuals.

PROFESSIONAL EXPERIENCE

Architectural historian, consultant, Berkeley, 1985 to 1988, 1990 to present.

Senior Architectural historian (variable part-time), AECOM, Oakland-San Francisco, 2017 to 2019.

Architectural historian, Cultural Resources Group, Dames & Moore/URS, San Francisco, 1990 to 2003.

Landmarks preservationist, Research Department, New York City Landmarks Preservation Commission, 1988 to 1990.

Teaching Assistant/Associate, Department of Architecture, Univ. of California at Berkeley, 1985 to 1986.

Architectural historian, The Foundation for San Francisco's Architectural Heritage, 1981 to 1984.

Archivist, College of Environmental Design Documents Collection, Univ. of California at Berkeley, 1979 to 1981.

Architectural historian, Charles Hall Page & Associates/Page, Anderson, Turnbull, Planning and Architecture, San Francisco, 1974 to 1981.

EDUCATION

History of Architecture, University of California at Berkeley, Advanced to Candidacy 1987.
A.B. with honors, Anthropology, Certificate with distinction in American Civilization, Princeton University, 1973.

SELECTED PROJECTS

Rodoni House, El Cerrito. 2016-2019. For this 1899 house and grounds associated with the Little Italy section of El Cerrito, Section 106 steps including evaluation, draft MOA, HALS documentation (with Denise Bradley for Komouros-Towey Architects). For LCA Architects and property owner.

Fireman's Fund Insurance Company Home Office, San Francisco. 2017-2018. National Register nomination form for innovative International Style office building designed in four phases beginning in 1957 by Edward B. Page and multi-element landscape designed by Eckbo, Royston & Williams and their successor, EDAW. For Laurel Heights Improvement Association.

School Administration Building/Paul Robeson Building, Oakland. 2016-2017. Evaluation of 1929 Administration Building designed by William Knowles for Oakland public schools; also the site of the assassination of the school superintendent Marcus Foster and the shooting of deputy superintendent Robert W. Blackburn. For Oakland Unified School District. Subsequently contributed to CEQA

Ethel Moore Memorial, Oakland. 2016-2017. Evaluation of the first public health building in Oakland, designed by Charles W. Dickey and completed in 1922. Named for a pioneering and influential activist in social welfare and public health who died while planning this building. For Oakland Unified School District.

Kraftile Demonstration House and Batchelder Terra Cotta Sculpture, Fremont. 2016-2017. Evaluation of complex site including rare tile house and sculpture. For City of Fremont.

Tesla Motors, Fremont. 2015-2016. Summary Evaluation and Treatment Recommendations for Fremont automobile manufacturing plant, originally designed by John Bolles and completed in 1963 for General Motors; later occupied by NUMMI. For Tesla Motors.

Newell Plantation House, Wharton County, Texas. 2007-2015. Documentation for evaluation of 1840s cotton plantation including headquarters house, agricultural landscape, and sites of slave quarters, in preparation for restoration of headquarters house. With Mary Hardy.

Macaulay Foundry, Berkeley. 2014-2015. Multi-phase history of a sprawling industrial complex focusing on changing foundry processes over 100 years. For property owner and City of Berkeley.

Luchetti House, San Francisco. 2014. Evaluation of 1951 Mid-century Modern house on Twin Peaks designed by Henry Hill for a San Francisco Italian family. For Friends of Clarendon Heights.

Corbett Heights Historic Context Statement, San Francisco. 2012. Historic Context Statement for West Eureka Valley neighborhood, a large and complex area with a patchwork of street grids, over 1,100 parcels, and buildings from every decade since the 1860s. For Corbett Heights Neighbors and the Historic Preservation Fund Committee.

Jackling House, Woodside. 2001-2010. Multi-phase study of 1926 estate of "copper king" Daniel Jackling, with Spanish Colonial Revival Style house designed by George Washington Smith, including evaluation, HABS, and salvage plan. For Steve Jobs and Town of Woodside.

Temple Sherith Israel, San Francisco. 2010. National Register nomination for monumental synagogue designed by Albert Pissis, site of 1906 graft prosecution trials, symbol of Jewish contributions to San Francisco. For congregation.

North Beach, San Francisco. 2010. Historic context statement for large post-1906 area dominated by flats and cottages, with social and ethnic history including beatniks, Chinese, LGBT, and Italians. For Northeast San Francisco Conservancy.

Tenderloin Historic District, San Francisco. 2009. National Register nomination for dense urban district of over 450 buildings including hotels, apartment buildings, garages, churches and film exchanges. For Tenderloin Housing Clinic.

Lachryma Montis, Sonoma State Park, Sonoma. 2007. Analysis of pre-fab 1851 wood frame house with adobe infill and subsequent buildings built for General Mariano Vallejo, as part of cultural landscape study by Denise Bradley. For California Department of Parks and Recreation.

Hearst Memorial Gymnasium. 2005. Historic Structure Report for major 1927 women's facility and extension of campus plan designed by Bernard Maybeck and Julia Morgan. With Molly Lembert and SMWM for University of California.

Palace of Fine Arts, San Francisco. 2005. Co-author of National Register Nomination of 1964 **r**econstruction of one of the principal features of the 1915 P.P.I.E. by William G. Merchant and Hans U. Gerson of original by Bernard Maybeck. For Maybeck Foundation.

Woman's Athletic Club of San Francisco. 2004. First women's athletic club west of Chicago and central element in elite women's club district, 1917 and 1923. Designed by Bliss & Faville. National Register nomination. For Metropolitan Club.

Palo Alto Historic Building Survey. 1998-2001. Training of volunteers, field survey, research, and evaluation of properties in citywide survey. With Dames & Moore for City of Palo Alto.

Whittell Estate, Lake Tahoe, Washoe County, Nevada. 2000. National Register nomination of 1939 rustic stone estate designed for George Whittell, Jr., investor and eccentric conservationist, by Frederick J. DeLongchamps. With Dames & Moore for University of Nevada.

Hoover Dam Diverter Towers, Arizona-Nevada. 1999. Section 106 evaluation of 1935 electrical transmission facility associated with Hoover Dam. With Dames & Moore.

Agnews State Hospital, Santa Clara. 1995-1998. Multi-phase study of architecturally and medically innovative 1907 mental health hospital designed by State Architect including determination of eligibility and HABS documentation. With Dames &Moore for multiple clients including Office of Historic Preservation.

Oakland Harbor Training Walls/Jetties and Federal Channel. 1997. Historic context, evaluation, determination of effects, mitigation for harbor structures begun in 1871 for NEPA and Section 106. With Woodruff Minor and Basin Research Associates, for U.S. Army Corps of Engineers.

City Hall Site, San Francisco. 1994. HABS documentation of exposed City Hall foundations for building designed by Augustus Laver, built 1871-1897, damaged in the earthquake and fire of 1906, and demolished in 1909. With Mary Hardy, Stephen Tobriner, Mesa Technical, and Basin Research for City of San Francisco.

Space Launch Complex 6, Vandenberg Air force Base. 1994. Evaluation of space launch facility built 1979-1986 for military manned space shuttle flights in polar orbit for Section 106. With Dames & Moore.

Reclamation District 1000, Sacramento County. 1994. Rural Historic Landscape Report on 55,000-acre site developed in 1911 by the Natomas Company with levees, canals, pump houses, roads, and farms for NEPA and Section 106. For Army Corps of Engineers, with Dames & Moore.

Los Caminos del Rio Project, Rio Grande Valley, Texas. 1992. Survey of potential National Historic Landmark sites and international context including 18th-century Spanish settlements, the capitol of the Republic of the Rio Grande in Laredo, and a 1912 irrigation system consisting of pumphouses, pumping machinery, and canals; co-author of NHL nomination for Roma, Texas Historic District, a mid-19th-century trading town of stone and brick buildings at the head of navigation of the Rio Grande River. With Dames & Moore for Texas Historical Commission.

Edwards Stadium, University of California, Berkeley. 1992. National Register nomination of 1932 track-and-field stadium, the largest in USA, designed by Warren Charles Perry, and site of Cold War U.S.-U.S.S.R. track events. For Berkeley Architectural Heritage Association.

St. Francis de Sales Roman Catholic Cathedral, Oakland, California. 1991. Multi-phase project including evaluation and HABS documentation of 1889 Gothic Revival church building damaged in 1989 earthquake designed by Charles J.I. Devlin. For the Diocese of Oakland.

Tarrant County, Texas, Architectural Survey. 1981-1991. Multi-year survey of Fort Worth, small cities, and rural areas with team in revolving roles. With Page, Anderson &Turnbull for Tarrant County Historical Commission.

Abattoir of the New York Butchers Dressed Meat Company, New York. 1989. Documentation of 1903 six-story industrial slaughterhouse, the largest Kosher slaughterhouse in U.S.A., designed by Horgan & Slattery. For New York City Landmarks Preservation Commission.

Syms Operating Theater, Roosevelt Hospital, New York. 1988. Landmark nomination report on pioneer 1890 modern operating theater designed by architect W. Wheeler Smith with surgeon Charles McBurney. For New York City Landmarks Preservation Commission.

San Francisco Civic Center Historic District. 1974-1987. Multi-phase project including National Register and National Historic Landmark nominations of multi-block complex of buildings and spaces designed in the spirit of the City Beautiful Movement 1912-1936. For San Francisco Architectural Heritage.

Amarillo Historic Building Survey, Texas. 1980. Historic building survey of City of Amarillo including downtown, residential, and industrial districts. With Charles Hall Page & Associates for City of Amarillo.

Phoenix Historic Building Survey, Arizona. 1979. Historic building survey of five districts including downtown and South Phoenix. With Charles Hall Page & Associates for City of Phoenix.

Sacramento Old City Survey, California. 1975. Historic building survey of residential neighborhoods within original city boundaries. With Charles Hall Page & Associates and John Beach for City of Sacramento.

Jessie Street Substation, San Francisco, 1974. National Register nomination of 1907 electrical substation designed by Willis Polk in brick and terra cotta representing influence of City Beautiful Movement. For Foundation for San Francisco's Architectural Heritage.

SELECTED PUBLICATIONS

Bliss & Faville: The Architectural Profession, Regional Ambitions, and the Development of San Francisco in the Early Twentieth Century. Draft 90% prepared for 640 Foundation, San Francisco, December 2019.

***The Claus Spreckels Building*, San Francisco.** San Francisco: Adolph Rosekrans, 2013.

***Port City: The History and Transformation of the Port of San Francisco, 1848-2010*.** San Francisco: San Francisco Architectural Heritage, 2010.

"**A History of the de Young and its Buildings**" in *The de Young in the 21st Century: A Museum by Herzog & de Meuron*. San Francisco: Fine Arts Museums of San Francisco and London: Thames & Hudson, 2005.

"**Architecture: Continuity and Change in California Courthouse Design, 1850-2000**" in *Courthouses of California: An Illustrated History.* San Francisco: California Historical Society and Berkeley: Heyday Books, 2001.

Building California: Technology and the Landscape. San Francisco: California Historical Society and William Stout Publishers, 1998.

"**Las Vegas, Nevada**" in *The Dictionary of Art,* London: Grove's Dictionaries, 1996.

"**Rearranging the Environment: The Making of a California Landscape, 1870s to 1990s**" in *Facing Eden: 100 Years of Landscape Art in the Bay Area,* Steven A. Nash, editor. Berkeley: University of California Press, 1995.

"**Meat Packing**" in *The Encyclopedia of New York City*. New-York Historical Society and Yale University Press, 1995.

"**Architecture**" in *San Francisco.* Paris: Guides Gallimard, 1993. English edition, New York: Knopf, 1994.

Splendid Survivors: San Francisco's Downtown Architectural Heritage. Prepared by Charles Hall Page & Associates. San Francisco: California Living Books, 1979.

"**History of the Skyscraper**" (Review) in *Journal of the Society of Architectural Historians,* Vol. 37:3 (October 1978), 224-225.

From: Sean Timmons <sean.timmons@verve-engdesignstudio.com>

Subject: Re: Golden Gate Valley Light Studies

Date: March 3, 2021 at 9:44:26 AM PST

To: "maureen@ddmhww.com" <maureen@ddmhww.com>

Cc: Kelly Nice <knice@earthlink.net>

Hi Maureen:

I did receive your report and your voice mail. Apologies for my tardy response but I'm working overseas for several months on SV projects in Europe, so my schedule is hectic. Having said that, I'm happy to help. I have conducted a quick review of the reports you sent me and I comment as follows:

Daylight

SYMPHYSIS Summary: After performing the daylighting analysis, SYMPHYSIS concludes that the proposed project at 2653 Octavia Street will not reduce the visual comfort of the library's patrons in any significant way, when compared to the current existing conditions. The proposed project reduces the libraries' averaged illumination levels minimally for clear sky (-1.8%), overcast sky (-4%), and partly cloudy sky (-11.1%). For both the overcast and partly cloudy skies, the existing conditions require electrical illumination at ALL times to provide the necessary illumination recommended for libraries (300-500 LUX), thus even the small reductions with the proposed condition are irrelevant.

VERVE Sustainable Engineers Response: First and foremost, minimal impact on any structure due to the proposed project should NOT be classified as irrelevant.

The beautiful historic Beaux-Arts Golden Gate Valley Library in the Cow Hollow neighborhood of San Francisco is now LEED Gold certified. As part of the San Francisco Public Library's Branch Library Improvement Program, Timmons Design Engineers in collaboration with Tom Eliot Fisch and Paulette Taggart Architects renovated the building with new high-performance windows, energy efficient lighting and mechanical equipment, low-flow plumbing fixtures and a new photovoltaic system on the roof. The renovations along with a modern addition to improve accessibility earned the project a LEED Gold award for Commercial Interiors and improved the facility for local neighborhood residents and local school children, use.

A tremendous amount of architectural and engineering design time, vision and effort went toward the restoration project back in 2010. TDE was hired to assist in the restoration of this understated jewel of a building and return it back to its initial design

glory and re-establish the building to its surroundings and beautiful neighborhood. Our design approach was to enhance the existing passive features of daylight and thermal mass, and intertwine twenty first century technology, to deliver a modern, state of the art, energy efficient building within a very tight budget. This was achieved and more to the delight of the client and the local community. Our team provided full MEP and Sustainable Design services including CFD modelling to understand daylight and natural ventilation and take full advantage of both to improve wellness, comfort and reduce energy consumption.

Having reviewed the daylighting report, one would have to say its edited in favor of the Developer and conveniently ignores some critical positions presented by the addition of the residential development.

Figures 3 and 4 of the SYMPHYSIS report, depicts sunlight 3D massing models that conveniently indicate sunlight angles taken in the summer when the sun is at its peak position in the sky to present a position of no impact on the Library from the proposed Development. This is true for that time of year but the greatest impact on the Library will be realized when the sun is in its winter solstice and low winter sun angle. This has not been presented in any detail and I can safely say that the shadow cast on the south facing windows will be egregious and could also impact the efficiency of the roof mounted PV system which I do not see covered in the report.

The resulting shading impact of the development would result in extensive artificial lighting being delivered to the reading surface to maintain a comfort light level. The report mentions IES illumination levels of 300 to 500. VERVE would argue that the illumination level should be 500 minimum Lux level at the reading and school child project work surface to provide the wellness factor and visual comfort strived for in the original design in 2010. This would result in a far greater impact to the project Lux levels delivered to the project and therefore find fault with the proposed design in its present form.

VERVE would suggest that the architect of record for the proposed development review the aforementioned sun angles and put forward a design that has zero impact on the Library to ensure that this magnificent, old, and beautiful building is maintained in its current grandeur for now and future generations.

Kind Regards

Sean A. Timmons PE MBA B.Eng(H)

President & CEO

LEED AP

VERVE - Sustainable Engineering Design Studio

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Below please find my thoughts on some of the questions raised by the two studies - Daylight Impact Analysis December 2020 and Shading Impact Analysis December 2019 - commissioned by the SF Planning Department vis-à-vis 2651-2653 Octavia Proposed Renovation and its impact on the Golden Gate Valley Branch of SFPL.

I will just say that the consultant hired by the City staff is an expert in the software used to analyze daylighting - but he's relying on IES general numbers for light levels. Minimum lighting levels in libraries are based on tasks, not on general room averages. Basing it on the latter will skew the results.

Interior Library Analysis

I must say that I find the charts in the report confusing (and I know this stuff!). For instance, he concludes that there is only 1.7% difference between the proposed versus existing conditions, which appears to be the number that the planning department has used to conclude that there is no real impact. But what does this number mean? It is apparently the ratio (proposed versus existing) *over the entire year* of the daylighting levels when supplemental lighting is not required to bring the space up to 400 lux (40 footcandles).

That number is distorted by the summer months when the sun is high in the sky and the effect of the new project is not felt at all. But the real issue is what happens in the other months, particularly November through February. He gives a hint by charting one day in September assuming a partly cloudy sky. This is uninformative and misleading—it appears there is no effect of the new project. (Strangely, in the report, December 21 is a sunless day—what does that show?)

I would think that the analysis that would best show the effect of the new project is that of the *Daylight Autonomy* for the percentage of time, during the library's open hours (10am - 8 pm), from Nov. 1 to March 1, when supplemental light is NOT required to meet illuminance levels of 500 lux (50fc) in the Reading Areas. Then you'll see the true impact of the new building. (See below for why 500 lux should be used for the task lighting in the Reading Areas.)

In addition, there's a large body of evidence supportive of the fact that the quality of natural light is preferable to artificial light.

Averaging to 400 lux

The Daylight Impact Analysis averages recommended lux levels to 400 lux across the entire floor of the library.

Assuming that the lighting design is good (glare-free, etc.), the IES actually recommends 500 lux (about 50 footcandles) at the desktop where written material (text) is being viewed and 300-400 lux (30-40 fc) otherwise (aisles, etc.). There is nothing about averaging across the entire floor. Choosing 400 lux as an average is an over-

simplification—reading surfaces should be 500 lux, not an average with the light levels of the surrounding floor area.

Most people do not understand that the lighting level recommended for the stacks is in *vertical footcandles* (or vertical lux) and these vary depending on the level of the shelf. (See diagram and explanation below.) The stack area lighting is NOT horizontal illumination as in the reading areas. One needs adequate light to read the titles on the books. So the blanket average can't really be applied to stack areas.

See attachment A (next page).

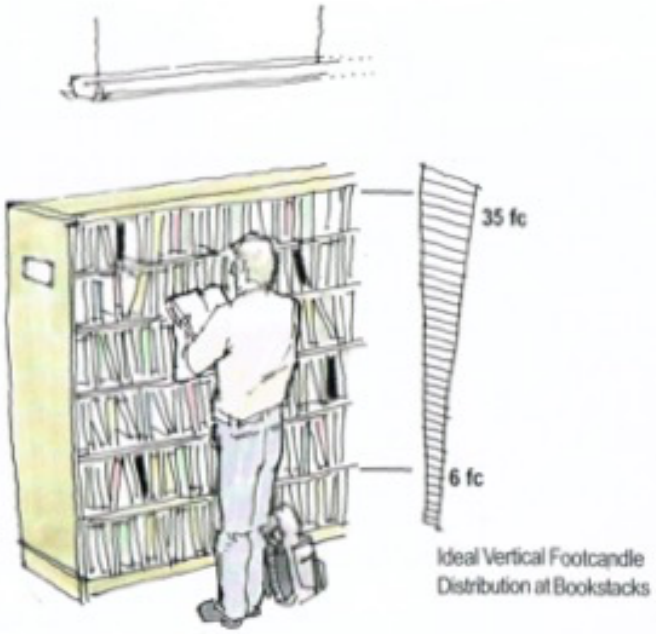
Attachment A

EMS Option 4.5. *In new buildings, carefully study stack light fixture layout alternatives for light levels provided across stack face and installed watts required to achieve those levels.*

Lighting Design in Libraries

Library lighting tasks have specific design requirements. The computer workstation is a common type of library task area, and the book stack is another major lighting task area in the library.

Book stacks must be lit adequately so that patrons can find books and staff can shelve books without visual discomfort. Evenness of illumination across the stack face is more important than achieving a high lighting level at any single point. The lighting level should be a minimum of 6 fc (footcandles) measured vertically on the face of the book spine at a height of 12 inches above the floor, and a maximum of 35 fc at any height, so that no more than a 6:1 ratio results across the entire vertical face of the bookstack.



Ideal Vertical Footcandle Distribution at Bookstacks

Figure 4.5. Ideal vertical footcandle distribution at bookstacks. Light fixtures should be selected and laid out to minimize electric power requirment while maintaining this light distribution.

The claimed 1.8% reduction in light levels (at 400 lux) appears to be a best case example generated for June 21st with clear sky. But actually, the 1.8% reduction is his analysis of the entire year, not the single-day charts and analysis. The report is confusing in this way. I think that the SF Planners are misled as well. They see "1.8% impact" and conclude "no real impact".

The winter light readings for December 21st are not included when the sun is at a lower, more southerly position to the East/West oriented Library and may cause greater reduction. Readings on December 21st are included in the 2019 Solar Panel Analysis, however, with significant impact shown, so there is a lack of consistency between the data points selected for the two studies.

Determining significant reductions in light

11.1% reduction on a partly cloudy day on September 21st is provided as an example and seems like it could be a significant reduction. But one day does not tell the story. Theoretically, as long as the minimum light levels are achieved, it would be okay. But are they? There is not enough data provided to know that.

Solar Panel Analysis

Reduction in solar radiation across both arrays.

The claim is an overall 5.8% reduction in solar radiation across both arrays. The report states: "At most, the solar array would see a 19.8% decrease in solar radiation on the lower solar panels" and the Eastern panels experience a 69% reported increase in shading.

This is straightforward: if the panel gets shade on even a portion, it essentially gets shut down. So, the new project is cutting off part of your renewable energy supply and effectively increasing your carbon footprint.

You probably can calculate this by knowing how much fraction of the output you would lose every day and then use last year's data from the meters on the solar system. The answer would be kWh. That would have to be made up by PG&E electricity, which has a certain fraction of its power produced by gas power plants. They can probably supply the amount of CO2 equivalent to your lost kWh.

Edward Dean, FAIA, LEED® AP BD+C, PhD
Principal

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10 April 2021

TO: **Kelly Nice and Maureen Holt**

FROM: George Loisos and Susan Ubbelohde, Principals

RE: Golden Gate Valley Branch Library
Impact on Daylight by Proposed Addition at 2652-2653 Octavia Street

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George Loisos and Susan Ubbelohde were contacted by Kelly Nice and Maureen Holt in March 2021 with concerns about the proposed addition to 2651-2653 Octavia. In particular, they are concerned about the impact of this proposed addition on the daylight in the Golden Gate Valley Library at asked us to review the studies dated December 1, 2019 and December 13, 2020 by Symphysis.

We are well prepared to review the studies and comment on the issue. As founders and principals of Loisos + Ubbelohde, we each have over 40 years of experience in shading and daylighting analysis. Our firm Loisos + Ubbelohde is a leading firm in analysis of sun and daylight conditions (our work can be seen at http://www.coolshadow.com). We bring extensive experience with buildings recognized for their design quality and sustainable performance, with over 75 AIA design and sustainability awards and 17 LEED Platinum buildings. We have worked with a wide range of clients, design teams and projects, including the 4,000 sf Windhover Contemplative Center at Stanford and the 2 million sf Headquarters for Facebook. George Loisos is a registered architect in California. Susan Ubbelohde is Professor Emerita at UC Berkeley and taught graduate daylighting design and simulation for 27 years at UC Berkeley. We have conducted research for the US Department of Energy, the California Energy Commission and Lawrence Berkeley National Lab on daylighting performance, published numerous papers on daylighting simulation and design and delivered conference presentations and keynotes on our work and research internationally.

We find that the two studies are unclear, non-comprehensive in the analysis, and likely to be inaccurate. We don't necessarily disagree with the final conclusions: (1) that the proposed addition will reduce the energy output of the PV arrays and (2) the daylight in the reading rooms requires supplemental electrical lighting for part of the year and will require some greater level of electrical lighting once the addition is built.

However, we do not trust the accuracy of the reports describing the impact of the proposed addition– the impact could be greater or less than indicated (see our comments on this point in the addendum to this letter). More importantly, the results and conclusions in the two reports don't directly address the questions at the heart of the concern. The questions are:

1. To what extent does the proposed addition reduce the energy delivered by the PV arrays?

2. To what extent does the proposed addition reduce the contribution of the south-facing windows to the daylighting in the library reading rooms and stacks? Is this significant in the overall daylighting of the spaces? How does it impact the color of the daylight with the blocking of direct sun?
3. Is the historical experience of the library, which was designed to admit daylight from all sides and to use electrical lighting as supplementary, altered or damaged by the proposed addition?

We are happy to answer any questions about our comments and understanding of the project.

Addendum: Technical concerns on the two reports

The software used is Ecotect, which was discontinued by the company that owns it (Autodesk) in March 2015. Ecotect was developed for education applications and the accuracy of the daylighting has not been validated as accurate for professional or research purposes. In the Shading Impact Analysis (December 1, 2019), this is not a serious issue, since sun angles are well known and the analysis is simply trigonometry that conform to and are validated against 'CIBSE TM33 (2006) Tests for Software Verification and Accreditation' according to Autodesk.
However, the daylighting analysis provided by using Ecotect coupled with Radiance suffers from a surplus of defaults in the application and was never successfully validated as a daylighting prediction tool. L+U has used native Radiance in Unix (without the Ecotect front end since 1995 and has validated the results regularly against built projects as well as in funded research projects. For those with less experience, since 2015 there have been a number of new software tools that are more sophisticated than Ecotect available that use the simulation engine of Radiance but provide a more flexible interface for the input of building and site conditions to better capture all the factors that result in the daylight found in real buildings.

The data for the sky conditions are appropriately matched to the illumination conditions of real climate data, however the data used is collected at SFO, which has different annual skies than the location of the library. **A more proximate data set should have been used, especially for the Shading Impact Report which is measuring the solar radiation on the arrays.** We are also concerned by the incorrect statement on p.47 of the Daylight Impact Report that states "Because there is no sun on overcast days (worst case, low light levels), there is minimal variability in light levels during the day [FALSE], thus this sky condition can be applied to any time of the day and any day of the year.[FALSE]" A glance at sky data for any overcast sky condition shows changes in the available illumination from the overcast sky by the time of day and also by the date of the year. Similarly, the Design Sky Value is not a constant from season to season but varies with the day and cloud cover. **In conclusion, the sky conditions used in the simulations are not appropriate for this area of San Francisco and are not carefully considered as to application.**

In the Shading Impact Report, the complexity of shadow impacts on a PV array is not addressed. While it is clear that the east and west arrays are separate, PV panels in one array are typically connected in series. A shadow that falls on one panel of the array will shut off energy production from all other panels in the same circuit. Thus the analysis should be more finely grained, looking at hour by hour generation of the arrays and taking into account

the circuiting (which must be available from the library). An animation of the shadows (both existing and proposed) would also help explain the role of the proposed addition over the course of the day and throughout the seasons of the year.

Context and 3D model. The 3D model was developed by Symphysis from available sources. We would have urged the use of a commercial 3D model of the surrounding area to prevent estimates that arise from matching 2D GIS information and a take-off of the 3rd dimension from Google Earth. However it is not apparent that there are significant problems with the 3D model of the topography and buildings except lack of detail.

Street trees not included in the 3D model and simulations. There is a significant growth of mature street trees on the north side of the library that has been left out of the analysis. These trees, which definitely exist, will completely change the overall daylight intensity and distribution **The street trees will substantially decrease the illumination provided by the north-facing windows, thereby increasing the relative daylight contribution of the south-facing windows that are impacted by the proposed addition.**

In addition to these problems with accuracy in modeling, the Daylight Impact Analysis Report also makes it hard understand the patterns and nature of impact by the proposed addition and the metrics used are not helping. The Daylight Autonomy results are useful (except for the problems with accuracy detailed above) because they use real weather data in the simulations and describe the full year of daylighting performance in one set of numbers. Beyond that we still do not know how many hours or days at this location will have what kind of sky condition, so we cannot gauge the actual impact over the course of a year beyond the autonomy calculation. We do not know what a clear day in December will deliver, or an overcast morning in June, nor a clear day in September although all happen frequently. This means the percentage differences on pages11-21 not a useful to characterize the impact.

Glare Analysis. The analysis on pp. 38-39 discusses the calculation of glare in the two reading rooms. And is really not a useful study relative to the issues in contention. The conclusion is that the proposed addition somewhat reduces glare from the south windows, even though the analysis also indicates that glare from the south windows is not a problem as it never exceeds 0.30. We do not use the DGP because it is still in development and has not yet assisted us in identifying glare that we could not already see in visual observation. There must be some visual discomfort from the south windows now (although it isn't indicated in the calculation results) because there is screening or shades deployed in the photographs on the bottom of half of these windows to control the entry of the sun.

From:	BOS Legislation, (BOS)
To:	gloria@gsmithlaw.com; "jcotecook@aol.com"; ryan@zfplaw.com
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Zushi, Kei (CPC); Rosenberg, Julie (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS)
Subject:	PLANNING DEPARTMENT RESPONSE: Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Appeal Hearing April 20, 2021
Date:	Monday, April 12, 2021 12:04:43 PM
Attachments:	image001.png

Greetings,

The Office of the Clerk of the Board received the following response from the Planning Department, regarding the appeal of CEQA Exemption Determination for the proposed 2651-2653 Octavia Street project.

Planning Department Response - April 12, 2021

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 210275

Regards,

Lisa Lew
San Francisco Board of Supervisors
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(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.
Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services.

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San Francisco Planning

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Categorical Exemption Appeal

2651-2653 Octavia Street

Date:	April 12, 2021
To:	Angela Calvillo, Clerk of the Board of Supervisors
From:	Lisa Gibson, Environmental Review Officer – (628) 652-7571
	Kei Zushi - kei.zushi@sfgov.org; (628) 652-7495
RE:	**Planning Case No. 2018-011022ENV**
	Appeal of Categorical Exemption for 2651-2653 Octavia Street
Hearing Date:	April 20, 2021
Project Sponsor:	Jane Cote-Cook, (415) 500-1610
Appellant(s):	Gloria D. Smith, on behalf of GGV Library Friends

Introduction

This memorandum is a response to the letter of appeal to the board of supervisors (the board) regarding the planning department's (the department) issuance of a categorical exemption under the California Environmental Quality Act (CEQA determination) for the proposed 2651-2653 Octavia Street project (proposed project).

The department, pursuant to Article 19 of the CEQA Guidelines, issued a categorical exemption for the proposed project on January 27, 2021 finding that the proposed project is exempt from the California Environmental Quality Act (CEQA) as a Class 1 categorical exemption.

The decision before the board is whether to uphold the department's decision to issue a categorical exemption and deny the appeal, or to overturn the department's decision to issue a categorical exemption and return the proposed project to the department staff for additional environmental review.

Site Description and Existing Use

The approximately 3,100-square-foot proposed project site (Assessor's Block 0554 and Lot 002) is located on the block bounded by Green Street to the north, Octavia Street to the east, Vallejo Street to the south, and Laguna Street to the west, in the Pacific Heights neighborhood. The proposed project site is within the Residential, House, Two-Family (RH-2) Zoning District and a 40-X Height and Bulk District. The proposed project site is currently occupied by a two-family residence.

Project Description

The proposed project would construct a fourth-floor-level vertical and horizontal addition to an existing 37-foot-tall (inclusive of a 7-foot-tall mansard roof), three-story, 4,151-gross-square-foot two-family residence constructed in 1950, resulting in a 40-foot-tall (exclusive of a 3.5-foot-tall parapet and clear glass guardrail on the roof deck), four-story, 6,512-gross-square-foot two family residence. The project construction would involve localized excavation for new foundation and possible excavation to replace existing foundations in kind, resulting in a total of approximately 15 to 30 cubic yards of soil excavated. The average depth of excavation would be 1.5 feet, with a maximum depth of 2 feet.

Background

The following is a brief summary of the relevant project background for the appeal of the January 27, 2021 categorical exemption issued for the 2651-2653 Octavia Street project.

On August 3, 2018, the project sponsor, Jane Cote-Cook, filed a building permit application for the proposed project with the department of building and inspection (building department).

On August 10, 2018, the project sponsor filed a project application with the department for its review of the proposed project described above.

On September 5, 2019, the department issued a categorical exemption determination, finding that the proposed project was categorically exempt under CEQA Class 1 - alteration and addition to an existing structure, and that no further environmental review was required.

On September 19, 2019, the department issued neighborhood notification pursuant to planning code section 311 for the proposed project under building permit application #2018.08.03.6405.

On October 21, 2019, Paul Guermonprez, on behalf of the 2634 Octavia Street Homeowners Association (HOA) and 1791-1795 Green Street HOA, filed with the department a discretionary review request regarding the proposed project.

On February 6, 2020, the planning commission (commission) denied the discretionary review request at a public hearing (Planning Department Case No. 2018-011022DRP), which constituted the approval action for the proposed project under section 31.04(h) of the San Francisco Administrative Code.

On March 6, 2020, Maureen Holt, Elizabeth Reilly, Paul Guermonprez, and Jack Fowler timely filed an appeal of the September 5, 2019 categorical exemption to the board.

On March 17, 2020, the Office of the Clerk of the Board scheduled a hearing before the board to hear the appeal on April 21, 2020.

On March 20, 2020, the Office of the Clerk of the Board continued the appeal hearing indefinitely in accordance with Governor Gavin Newsom's statewide order for all residents to stay at home in response to the COVID-19 pandemic, and numerous preceding local and state proclamations, orders, and supplemental directions.

On July 14, 2020, the Office of the Clerk of the Board rescheduled the appeal hearing to July 28, 2020.

On July 28, 2020, the board held a duly noticed public hearing to consider the appeal, upheld the appeal, and reversed the September 5, 2019 categorical exemption.

On September 22, 2020, the board unanimously passed Motion No. M20-129 finding that the department did not document that it analyzed the proposed project's potential impacts on the character-defining features[1] of the Golden Gate Valley Library ("library"), a category A known historic resource,[2] prior to issuing the September 5, 2019 categorical exemption. Motion No. M20-129 directed the department to analyze the proposed project's potential historic resource impacts on the character-defining features of the library – specifically, to consider whether the proposed project's potential impacts on the lighting inside the library's main reading room would significantly impact those character-defining features. In Motion No. M20-129, the board found that, except for the proposed project's potential historic resource impacts on the character-defining features of the library, the September 5, 2019 categorical exemption "conforms to the requirements of CEQA and is adequate, accurate, and objective, the record does not include substantial evidence to support a fair argument that the proposed project may have a significant effect on the environment, and no further analysis is required."

On January 27, 2021, the department issued a second categorical exemption determination, which is the subject of this appeal, again finding that the proposed project is categorically exempt under CEQA Class 1 - alteration and addition to an existing structure, and that no further environmental review is required. As directed by the board, before issuing the second categorical exemption determination, the department carefully considered the proposed project's potential impacts on the character-defining features of the library, including the proposed project's potential impacts on the interior light level inside the library. The department also documented its analysis in the historic preservation review memorandum attached to the January 27, 2021 categorical exemption.[3]

On February 4, 2021, the commission denied the discretionary review request at a public hearing (Planning Department Case No. 2018-011022DRP), which constituted the approval action for the proposed project under section 31.04(h) of the San Francisco Administrative Code. This hearing was held solely because the September 5, 2019 categorical exemption, on which the commission's February 6, 2020 decision relied in denying the 2019

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1 "Character-defining features" are physical characteristics of a historic resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources or local register of historical resources (CEQA Guidelines section 15064.5(b)(2)).

2 Category A resources include those listed on or formally determined to be eligible for the California Register and those listed on adopted local registers, and properties that have been determined to appear or may become eligible for the California Register. Category B properties are those requiring further consultation and review. Properties that do not meet the criteria for listing in category A, but for which the City has information indicating that further consultation and review will be required for evaluation whether a property is a historical resource for the purposes of CEQA.

3 Allison Vanderslice, Planning Department, *Historic Preservation Review Memorandum, 2651-2653 Octavia Street (Planning Case No. 2018-011022ENV)*, January 26, 2021, available online at https://sfplanninggis.org/PIM/.

discretionary review request, became void under section 31.16(b)(10) of the San Francisco Administrative Code as a result of the board's Motion No. M20-129 to overturn the September 5, 2019 categorical exemption.

On March 5, 2021, Gloria D. Smith, on behalf of GGV Library Friends (collectively, "appellant"), timely filed an appeal of the January 27, 2021 categorical exemption to the board.

On March 12, 2021, the Office of the Clerk of the Board scheduled a hearing before the board to hear the appeal on April 20, 2021.

CEQA Guidelines

Categorical Exemptions

In accordance with CEQA section 21084 CEQA Guidelines sections 15301 through 15333 list classes of projects that have been determined by the Secretary of Resources not to have a significant effect on the environment and are exempt from further environmental review.

CEQA Guidelines section 15301, or Class 1, consists of the operation, repair, or minor alteration of existing public or private structures and facilities, including additions to an existing structure, provided that the addition will not increase by more than 10,000 square feet if the project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan, and the area in which the project is located is not environmentally sensitive (CEQA Guidelines section 15301(e)).

In determining the significance of environmental effects caused by a project, CEQA Guidelines section 15064(f) states that the decision as to 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 section 15064(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."

Planning Department Responses

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

Response 1: The department's issuance of a new categorical exemption determination for the proposed project was not inconsistent with the board's findings in Motion No. M20-129.

The appellant contends that the department acted in violation of the board's findings that "a categorical exemption cannot be relied upon to approve a project that may have an impact on a historic resource" in Motion No. M20-129. The board adopted the motion on September 22, 2020 to adopt its findings to reverse the September 5, 2019 categorical exemption issued for the proposed project. According to the appellant, the proposed project would have negative impacts on the library, a category A known historic resource, and as a result the department's issuance of the January 27, 2021 categorical exemption for the proposed project violated the board's findings noted above.

Contrary to the appellant's contention, the department acted consistently with the board's findings as explained below. The appellant misinterprets the quoted language out of context. The quoted language can be found in a section on page 3 of Motion No. M20-129 where the board summarized the requirements under CEQA section 21084 and CEQA Guidelines sections 15064.5 and 15300.2. CEQA Guidelines section 15300.2(f) states that "[a] categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historic resource." [Emphasis added.] None of the sections in the CEQA statute or the CEQA Guidelines, including the three sections cited above, prohibits the department from issuing a categorical exemption for a project that has a less-than-significant impact on a historic resource.

As directed by the board, the department properly analyzed the proposed project's potential historic resource impacts on the character-defining features of the Golden Gate Valley Library. The department's analysis demonstrates that the proposed project would not cause a substantial adverse change in the historic significance of the library. The department's analysis is supported by substantial evidence in the record, as discussed in Responses 3 and 4 below. The department properly documented its analysis before it issued the January 27, 2021 categorical exemption for the proposed project. Thus, the department acted consistently with, and responded to, the board's findings included in Motion No. M20-129.

Response 2: The proposed project's less-than-significant impacts on historic resources do not disqualify it from a class 1 categorical exemption under CEQA.

The appellant argues that the proposed project is not eligible for a class 1 categorical exemption under CEQA because the proposed project may impact the library, a historic resource. According to the appellant, if a project has an impact - even if it is a less-than-significant impact - on a historic resource, the department is prohibited from issuing a categorical exemption for the project. The appellant is mistaken.

The appellant misinterprets the requirements of CEQA. As discussed in Response 1 above, neither the CEQA statute, nor the CEQA Guidelines, prohibits the lead agency from issuing a categorical exemption for a project that has a less-than-significant impact on a historic resource. Specifically, CEQA sections 21084(a) and (e) prohibit a categorical exemption from being issued for a "project that may cause a substantial adverse change in the significance of a historical resource." [Emphasis added.]

In determining if a project may cause a substantial adverse change in the significance of a historic resource, CEQA Guidelines section 15064.5(b)(3) clarifies that a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer (secretary's standards), shall be considered as mitigated to a level of less than a significant impact on the historical resource.

As discussed in the historic preservation review memorandum attached to the January 27, 2021 categorical exemption issued for the proposed project, the department analyzed the proposed project's impacts on historic resources, including the Golden Gate Valley Library, and determined based on substantial evidence in the record that the proposed project would meet the secretary's standards and thus would result in less-than-significant impacts on historic resources – specifically on the library. Thus, the department correctly determined that the proposed project's historic resources impacts do not disqualify it from a class 1 categorical exemption under CEQA.

Response 3: The department determined based on substantial evidence in the record that interior light level is not a character-defining feature of the Golden Gate Valley Library.

The appellant contends that indoor light level should be considered a character-defining feature of the library because the library's interior was designed with large windows on all sides to maximize natural light into the main and other reading rooms.

The department's historic preservation review of a project involves two steps, consistent with CEQA requirements. The first step is to determine whether a historic resource is present that could be impacted by the project and, if so, to identify its character-defining features that convey the significance of the historic resource. This first step is addressed in this response, Response 3. The second step (discussed in Response 4, below) is to determine whether the project would materially alter any of the identified character-defining features.

To identify the library's character-defining features, the department reviewed the 2008 historic resource evaluation response prepared by the department for the renovation of the library (Planning Department Case 2008.0239E)[4] and the proposed character-defining features in the 2020 draft landmark report prepared for the library.[5] As discussed in the January 26, 2021 historic preservation review memorandum the library is a Carnegie library designed by master architect Ernest Coxhead. As the library is a Carnegie library, the department also reviewed the character-defining features of the six landmarked Carnegie libraries in San Francisco.[6] Similar to the Golden Gate Valley Library, these libraries were built using Carnegie Corporation grant funds and designed in the early 20th century by master architects (G. Albert Landsburgh, Bliss & Faville, and John Reid, Jr.) following the guidelines proscribed for branch libraries by the Carnegie Corporation. None of these landmarked libraries includes indoor lighting as a character-defining feature.

The department confirmed the previously identified character-defining features of the Golden Gate Valley Library that are significant to expressing master architect Ernest Coxhead's design of the library. These features include the following: exterior composition and materials, especially the window pattern including arched windows on all sides and terra cotta detailing; basilica shaped-plan; small alley at south side and courtyard at west side; corner lot location; west side courtyard gates of similar terra cotta material; interior entry vestibule and stair; the spatial volume of the main reading room; the ornamental ceiling of the main reading room, and built in shelving around the main reading room.

The appellant speculates that an oversight caused indoor light level not to be listed as a character-defining feature of the six Carnegie libraries. However, the appellant does not provide evidence to support this assertion. The San Francisco Landmarks Preservation Advisory Board, commission, and board reviewed each of the six

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4 Planning Department, *Historic Resource Evaluation Response for 1801 Green Street, Golden Gate Valley Branch Library, Case No. 2008.0239E*, October 17, 2008, available online at https://sfplanninggis.org/pim/.

5 Bridget Maley, *Draft Landmark Designation Report, Golden Gate Valley Branch, San Francisco Public Library, 1801 Green Street, San Francisco, CA, Case No. 2020-003803DES*, July 22, 2020, available online at https://sfplanninggis.org/PIM/.

6 The San Francisco Carnegie libraries are significant for their architecture and their association with the patterns of social and cultural history of San Francisco, particularly with the contesting of political and cultural power between working class based groups and middle class based Progressives; architectural embodiment of Progressive and City Beautiful tenets of civic grandeur used as a means of social organization, particularly to the acculturation of working class and immigrant populations; architectural embodiment of the distinctive characteristics of branch libraries, especially those delineated in "Notes of the Erection of Library Buildings."

Carnegie libraries at public hearings as part of the landmarking proceedings for them and determined that interior light level is not a character-defining feature for any of the Carnegie libraries.

As discussed above, the department correctly determined based on substantial evidence in the record that interior light level in the library's main reading room is not a character-defining feature that conveys the historic significance of the library. The substantial evidence test applies to the lead agency's determinations of whether a historic resource exists.[7] The determination of what physical characteristics are the character-defining features of a historic resource is part of the process of identifying a historic resource and assessing physical environmental impacts under CEQA. The appellant has not demonstrated that the department's determination in this regard is not supported by substantial evidence.

Response 4: The proposed project's impact on the indoor light level in the library's main reading room would not have a significant impact on the library's character-defining features.

In Motion No. M20-129, the board directed the department to analyze the proposed project's potential historic resource impacts on the character-defining features of the library – specifically, to consider whether the proposed project's potential impacts on the lighting inside the library's main reading room would significantly impact those character-defining features.

As directed by the board, the department analyzed the proposed project's potential impacts on the character-defining features of the library. This analysis considered whether the proposed project's potential impacts on the lighting inside the library's main room would significantly impact those character-defining features, as explained below. A project that meets the secretary's standards would not result in a significant impact on a historic resource.

Examples of the types of changes that could result in a significant impact to the historic significance of the library include removal of windows or new additions that would block or enclose exterior windows so that they no longer function as exterior windows; such changes could alter Coxhead's design and modify character-defining features. The proposed project does not include any changes to these character-defining features that could result in an impact on the historic significance of the library. No windows would be removed, altered, covered over, or otherwise fail to remain exterior windows as a result of the proposed project. Therefore, Coxhead's design of a grand interior reading room with exterior windows on all sides would not be altered by the proposed project.

The appellant analogizes obstructing natural light into the library's main reading room to physically altering the reading room. The appellant provides no evidence to support this claim. This analogy is inconsistent with the National Register Bulletin No. 15[8] and professional practice.

As discussed in Response 3, the department determined that indoor light level in the library's main reading room is not a character-defining feature of the library. As a result, the department is not required to further analyze the proposed project's impact on the indoor light level in the library's main reading room under CEQA.

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[7] *Valley Advocates v. City of Fresno* (2008) 160 Cal.App.4th 1039.

[8] National Park Service. *National Register Bulletin 15. How to Apply the National Register Criteria for Evaluation*, available online at: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.

Thus, the proposed project itself or the proposed project's impact on the indoor light level in the library's main reading room would not have a significant impact on the library's character-defining features.

Response 5: Based on substantial evidence in the record, the proposed project's impact on the indoor light level in the library's main reading room would not substantially affect the natural light (daylight) levels and quality at the main floor reading room of the library. Furthermore, the City Librarian has no concerns about the proposed project's impact in this regard.

Although the department determined that indoor light level is not a character-defining feature of the library and is therefore not a factor relevant to the determination that the proposed project would affect the library's historical significance, a daylight impact study[9] was prepared by a consulting firm specializing in shading impact analysis in December 2020 pursuant to the board's findings in Motion No. M20-129. Planning department preservation and environmental planning staff reviewed the scope of the study to ensure that it would fully address the board's direction to assess the impact of the proposed project on the natural light (daylight) levels and quality at the main floor reading room of the library.

The December 2020 study concluded that the proposed project would not substantially reduce the visual comfort of the library's patrons. Specifically, the study found that the proposed project would reduce the library's averaged indoor illumination levels by 1.8 percent on clear days, 4 percent on overcast days, and 11.1 percent on partially cloudy days, as compared to the existing conditions. The daylight impact study further states that the existing indoor illumination levels on overcast and partially cloudy days require supplemental electrical illumination at all times to provide the necessary illumination recommended for libraries (300-500 LUX). In other words, the lights in the library already have to be turned on during overcast and partially cloudy days, so library patrons' experience would not be substantially altered by the minimal reduction in indoor illumination levels at those times. The minimal reductions in the indoor illumination levels that would result from the proposed project would not alter the comfort of library patrons or materially impair any of the character-defining features of the library (i.e., exterior composition and materials , especially the window pattern including arched windows on all sides and terra cotta detailing; basilica shaped-plan; small alley at south side and courtyard at west side; corner lot location; west side courtyard gates of similar terra cotta material; interior entry vestibule and stair; the spatial volume of the main reading room; the ornamental ceiling of the main reading room, and built in shelving around the main reading room).

Two supplemental illumination impact analysis reports were voluntarily prepared by the project sponsor in April 2021 to provide more detailed analysis of the project's shading impacts.[10,11] While the department did not rely on either of these reports in preparing this response or issuing the January 27, 2021 categorical exemption, the results of these reports are summarized below for informational purposes.

One of the reports, entitled "Illumination Impact Analysis Report, Sun Shade Devices Impact Study for Golden Gate Valley Library," evaluates project effects during the library's typical indoor conditions when the existing grey

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9 Symphysis, *Daylight Impact Analysis Report for 2651-53 Octavia Street*, December 13, 2020, available online at https://sfplanninggis.org/PIM/.

10 Symphysis, *Illumination Impact Analysis Report, Sun Shade Devices Impact Study for Golden Gate Valley Library*, April 2021, available online at https://sfplanninggis.org/PIM/.

11 Symphysis, *Illumination Impact Analysis Report, Daylight & Electrical Lights Illumination Study for Golden Gate Valley Library*, April 2021, available online at https://sfplanninggis.org/PIM/.

shades on the library's windows are used.[12] The analysis shows that using the window shades reduces the indoor light level inside the reading room more than would occur with the proposed project.

The other report, entitled "Illumination Impact Analysis Report, Daylight & Electrical Lights Illumination Study for Golden Gate Valley Library," shows that under typical indoor conditions, where the electrical lights are turned on inside the library's main reading room,[13] the proposed project's impacts on the indoor light level would be less than those shown in the December 2020 study, except that the proposed project would reduce the library's averaged indoor illumination by 2 percent on clear days (i.e., a 0.2-percent greater reduction compared with the results in the December 2020 study). Thus, the results in these supplemental reports do not change the department's determination in the January 27, 2021 categorical exemption.

Representatives of the San Francisco Public Library (SF library) have indicated that the SF library has no concerns regarding the effect of the proposed project on the amount of the light that would be able to enter the Golden Gate Valley Library.[14]

The analysis described above demonstrates that the department fully analyzed the proposed project's impact on the indoor light level in the library's main reading room as directed by the board Motion No. M20-129.

Response 6: The appellant's concerns regarding the effects of the proposed project on the library's solar system were previously raised to the board and were dismissed. As such, they cannot now be reconsidered. Furthermore, representatives of the library have no concerns regarding the proposed project's effects in this regard.

The appellant contends that the board should overturn the department's determination that the proposed project qualifies for a class 1 categorical exemption because the proposed project would partially shade photovoltaic solar panels on the roof of the Golden Gate Valley Library. The department recommends that the board reject this argument because the board already rejected such claims in its action on the prior appeal of this project.

Like the present appeal, the prior appeal of the categorical exemption for this project filed on March 6, 2020 (first appeal) contended that the board should overturn the department's CEQA determination for the proposed project because the proposed project would partially shade the solar panels on the roof of the library. The department addressed this claim in its July 20, 2020 response to the first appeal. During its July 28, 2020 public hearing on the first appeal, the board rejected the appellant's claims regarding the proposed project's shading of the library's solar system. Specifically, in Motion No. M20-129, the board found that except for the proposed project's potential historic resource impacts on the character-defining features of the library the September 5, 2019 categorical exemption "conforms to the requirements of CEQA and is adequate, accurate, and objective, the record does not include substantial evidence to support a fair argument that the project may have a significant

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12 The April 2021 Illumination Impact Analysis Report, Sun Shade Devices Impact Study states that "there is consistent use of dark grey shades, which cover half the glass of all south facing windows."

13 The April 2021 Illumination Impact Analysis Report, Daylight & Electrical Lights Illumination Study states that "during open hours, the normal use condition in the library is natural light from the windows AND illumination from electric lights."

14 Michael Lambert, City Librarian, San Francisco Public Library, Email to Kei Zushi, Senior Planner, Planning Department, March 23, 2021, available online at https://sfplanninggis.org/PIM/.

effect on the environment, and no further analysis is required." [Emphasis added.] The scope of the proposed project has not changed since the board adopted Motion No. M20-129 on September 22, 2020. As such, there is no reason to rehear this issue, which the board has already resolved in favor of the department.

Representatives of the SF library have indicated that the SF library has no concerns regarding the proposed project's impacts on the solar panels located on the library's roof.[15]

Response 7: The appellant misrepresents the requirements of CEQA concerning conflicts with plans, policies, and regulations.

The appellant states that under Appendix G of the CEQA Guidelines, "agencies must assess whether a project would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including a general plan, specific plan or ordinance) adopted for the purpose of avoiding or mitigating environmental effects." Based on this, the appellant appears to argue that the department violated CEQA by issuing the January 27, 2021 categorical exemption for the proposed project.

The appellant misstates the law. Under CEQA the department is required to analyze whether a project would result in a significant environmental impact due to a conflict with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The appellant fails to demonstrate that the proposed project's shading of the library's solar panels would result in a significant environmental impact. The alleged policy conflicts are irrelevant under CEQA in the absence of an associated significant impact on the physical environment. As discussed below, the proposed project's shading of the libraries solar panels would not result in a significant environmental impact. Thus, even if the proposed project's shading of the library's solar panels did conflict with an applicable plan, policy, or regulation, such a conflict would not provide a basis to overturn the department's CEQA determination for the proposed project.

A shadow study prepared for the February 6, 2020 public hearing where the commission reviewed the discretionary review request[16,17] indicates that that the proposed project would reduce solar radiation on the existing solar panels located on the library's roof by an average of 5.8%. The study also indicates that this decrease in solar generation translates to a reduction of 1,976 to 2,080 kWh per year or a reduction of $178 to $187 per year based on the commercial electrical rate of $0.99 per kWh. This reduction represents a little less than half of the energy consumption by a high efficiency electric hot water heater, which consumes approximately 4,600 kWh per year.[18] This level of reduction in the amount of solar radiation would not cause conflicts with a land use or renewable energy policy or plan in a way that would result in a significant environmental impact under CEQA, even if the proposed project were found to conflict with an adopted land use or renewable energy policy or plan that would apply to the proposed project.

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15 Ibid.

16 Symphysis, *Shading Impact Analysis Report for 2653 Octavia Street*, December 1, 2019, available online at https://sfplanning.org/hearings-cpc-grid.

17 To clarify the information in Table 1: Percentage Decrease in Global Horizontal Radiation at Roof Level in the December 2019 Shading Impact Analysis Report, the December 2019 report has been updated. *Shading Impact Analysis Report for 2653 Octavia Street*, December 1, 2019, Revised April 9, 2021, available online at https://sfplanninggis.org/PIM/.

18 Department of Energy, Office of Energy Efficiency & Renewable Energy, Energy Cost Calculator for Electric and Gas Water Heaters, available online at https://www.energy.gov/eere/femp/energy-cost-calculator-electric-and-gas-water-heaters#output.

The appellant points out that the shadow study indicates that the proposed project would increase shadowing on the eastern array of solar panels located on the library's roof by 69 percent. However, this does not change the department's determination that the proposed project would not conflict with a land use or renewable energy policy or plan in a way that would result in a significant environmental impact under CEQA. This is because the western array of solar panels on the library's roof would continue to receive solar radiation after the proposed project is completed (thus, the proposed project would reduce solar radiation on the existing solar panels located on the library's roof by an average of 5.8 percent.)

As noted above, representatives of the SF library have indicated that the SF library has no concerns regarding the proposed project's impacts on the solar panels located on the library's roof.

Based on the above, the department correctly determined that the project qualifies for a class 1 categorical exemption because the project would not conflict with any land use plan, policy, or regulation and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency in a way that would result in a significant environmental impact under CEQA.

Conclusion

The department has determined that the proposed project is categorically exempt from environmental review under CEQA on the basis that: (1) the proposed project meets the definition of one or more of the classes of projects that the Secretary of Resources has found do not have a significant effect on the environment, and (2) none of the exceptions specified in CEQA Guidelines section 15300.2 prohibiting the use of a categorical exemption are applicable to the proposed project. The appellant has not demonstrated that the department's determination is not supported by substantial evidence in the record.

For the reasons stated above and in the January 27, 2021 categorical exemption determination, the CEQA determination complies with the requirements of CEQA and the proposed project is appropriately exempt from environmental review pursuant to the cited exemption. The department therefore respectfully recommends that the board uphold the CEQA categorical exemption determination and deny the appeal of the CEQA determination.

From:	BOS Legislation, (BOS)
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Subject:	PROJECT SPONSOR REVISED BRIEF: Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Appeal Hearing April 20, 2021
Date:	Monday, April 12, 2021 10:04:23 AM
Attachments:	image001.png

Greetings,

The Office of the Clerk of the Board received the following REVISED brief from the project sponsor Ryan Patterson of Zacks, Freedman & Patterson, PC, on behalf of Jane Cote-Cook, regarding the appeal of CEQA Exemption Determination for the proposed 2651-2653 Octavia Street project, kindly disregard the previous brief from the project sponsor which was sent earlier.

Project Sponsor Brief - April 9, 2021

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 210275

Regards,

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(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.
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From: BOS Legislation, (BOS) <bos.legislation@sfgov.org>
Sent: Monday, April 12, 2021 8:59 AM
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Subject: PROJECT SPONSOR BRIEF: Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Appeal Hearing April 20, 2021

Greetings,

The Office of the Clerk of the Board received the following response brief from the project sponsor Ryan Patterson of Zacks, Freedman & Patterson, PC, on behalf of Jane Cote-Cook, regarding the appeal of CEQA Exemption Determination for the proposed 2651-2653 Octavia Street project.

Project Sponsor Brief - April 9, 2021

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 210275

Regards,

Lisa Lew
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

The Legislative Research Center provides 24-hour access to Board of Supervisors legislation, and archived matters since August 1998.

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

ZACKS, FREEDMAN & PATTERSON
A PROFESSIONAL CORPORATION

601 Montgomery Street, Suite 400
San Francisco, California 94111
Telephone (415) 956-8100
Facsimile (415) 288-9755
www.zfplaw.com

April 9, 2021

VIA E-MAIL

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94103
Board.of.Supervisors@sfgov.org

Re: Project Sponsor's Brief
Appeal of CEQA Exemption
2651-2653 Octavia Street – Case No. 2018-011022 PRJ

Dear President Walton and Supervisors:

The Planning Commission approved a modest addition to an existing two-family residence at 2651-2653 Octavia Street. The Project Sponsor seeks approval of the project in order to make the existing residence suitable for use as their multi-generational family home.

The Planning Department determined that the project meets all code requirements and qualifies for a Class 1 Categorical Exemption for additions to existing structures. The Planning Commission upheld that determination, which has been appealed by a group of neighbors due to unsubstantiated claims that the project could potentially impact the Golden Gate Valley Library's natural light and solar arrays. The Planning Department has thoroughly investigated all issues and determined that there would be no significant impacts to the library. The Project Sponsor respectfully requests that the Board of Supervisors deny the appeal and affirm the Planning Commission's approval of the Categorical Exemption for the following reasons:

- All south-facing windows that face the Project Sponsor's building are intentionally covered by dark grey shades that cover 50% of the windows and filter 90% of the natural sunlight because too much natural light already enters the library. Even with the intentional use of dark grey shades, there is plenty of light for patrons in the library and there is no impact to the library's historic character.

- The Sun Shade Impact Analysis Report finds that the grey shades reduce natural light in the library by -13.6% for overcast sky, -24.5% for partly cloudy sky, and -14.2% for clear sky. This intentional reduction in light is far less than the project's impact of -4% for overcast sky, -11.1% for partly cloudy sky, and -1.8% for clear sky.[1]

[1] All referenced studies can be found at the following link: https://zacks.egnyte.com/fl/GmWFU9Axzh

- Consistently during open hours, the normal condition in the library is natural light plus the use of electric lighting. The Illumination Impact Report for the library's normal environment of natural light and electric light finds that impact of the proposed project would de minimis, -1.0% reduction for overcast sky, -4.2% for partly cloudy sky, and -2.0% for clear sky.
- Even if there were significant impacts from the project, the consistent intentional use of electrical lights and dark grey sun shades in the library makes any hypothetical impacts to natural light from the project irrelevant.

- The neighbors' appeal admits that there are "not yet state or local laws on point to address protecting solar access" and impacts to adjacent solar panels are not governed by CEQA.

- The Shade Impact Analysis for the library's Solar Panels finds that the impact of the project on solarity would be de minimis, a reduction of $178 of solar energy production annually.

I. Factual Background

A Categorical Exemption for this residential addition was issued by the Planning Department in September 2019, a determination that was upheld by the Planning Commission in February 2020. The neighbors appealed the Planning Commission's ruling. Following a July 2020 hearing, the Board of Supervisors directed the Planning Department to conduct further investigations to quantify more fully whether the project may have an impact on the illumination of the library interior.

Over the next six months, the Environmental Planning Staff carried out the direction of the Board. They developed the scope of analysis, which consisted of finding the impact of natural light in the library for 2,406 unique points in the library for three sky conditions, during three times of the year, and for three different times of day. Symphysis, an independent Bioclimatic consultant, was contracted to complete the study. Environmental Planning thoroughly reviewed all of these findings.

The Project Sponsor and the Planning Department have been exhaustive in their due diligence to analyze all conceivable impacts the proposed project might have on the library. In addition to the above-mentioned analysis, three other illumination and shade studies were conducted: Shade Impact on the Solar Panels, Illumination with Normal Light Conditions (Natural + Electric), and Illumination impact of the Sun Shade Devices.

Because the statistical analysis from every shade and illumination study showed no significant impacts to the Library, the Planning Department determined no project revisions were necessary and issued a second Categorical Exemption in January 2021. In February 2021, the Planning Commission approved the project and the Categorical Exemption. On March 5, 2021

the same group of neighbors, now renamed the Friends of the GGV Library, again appealed the Planning Commission's approval of the second Categorical Exemption for the project.

II. The Project Is Categorically Exempt From Further CEQA Review

Categorical Exemptions apply to a list of classes of projects that have already been determined as a matter of law not to have a significant effect on the environment. (CEQA § 21084(a)). This project clearly falls within the Class 1 Categorical Exemption for minor additions of 10,000 square feet or less, as the project here is a 2,361-square-foot addition to an existing two-family residential structure. (CEQA Guidelines § 15301).

Thus, unless one of the limited exceptions to a Categorical Exemption applies, the project here is categorically exempt from further CEQA review. For projects that may impact historical resources, an exception is found if the project will cause a "substantial adverse change in the significance of a historical resource." (CEQA Guidelines § 15300.2(f)). An exception also applies if "the activity will have a significant effect on the environment due to unusual circumstances." (CEQA Guidelines § 15300.2(c)).

A party challenging an exemption has the burden to show a project *will* have a significant effect in order to overturn an exemption, as "it is not enough for a challenger merely to provide substantial evidence that the project *may* have a significant effect on the environment." (Berkeley Hillside Preservation v. City of Berkeley (2015) 60 Cal. 4th 1086, 1105). CEQA Guidelines Section 15384 states that "[a]rgument, speculation, unsubstantiated opinion or narrative" does not constitute acceptable evidence.

The neighbors merely assert that the project should be further investigated for potential impacts to the natural light entering the library and the effectiveness of the library's solar arrays and put forth unsupported narrative argument regarding the importance of the library and renewable energy. However, the Planning Department has already thoroughly investigated these issues, gathered facts, reviewed expert opinions, and determined that the project will not have a significant effect on the library's natural light or solar arrays. The neighbors have provided no factual evidence to refute the Planning Department's determination.

a. <u>The Project will not have a substantial adverse impact to the natural light of the Golden Gate Valley Library's reading room.</u>

The neighbors state that the exemption should be overturned solely to "investigate and then disclose" potential impacts to the natural light entering the library, which is exactly what the Planning Department has already executed with four exhaustive independent studies. Further, CEQA protects the "character defining" features of a historical resource, and the Planning Department correctly points out that natural light is not one of the "character defining" features of any of the Carnegie Libraries. Thus, even if the project were to have a substantial impact on the library's natural light, this impact would not adversely change the historical significance of the library. The neighbors' appeal admits this, stating that "character defining features are typically *material or physical features*" and their brief further explains that CEQA defines

historical impacts as "work that materially alters, in an adverse manner, those *physical characteristics that convey the resource's historical significance*." Thus, because natural light is not a character defining feature of the Library, the project's impacts to natural light are immaterial with respect CEQA.

Further, the Planning Department has already gathered substantial evidence from the Daylight Impact Analysis Report, which determined that the project will not, in fact, have a significant effect on the natural light entering the Library. Additional Illumination studies demonstrate that the library staff consistently utilizes electrical illumination and dark grey window shades during open hours that cover 50% of the windows. The analysis shows that for "best-case scenario" clear sunny days (i.e. the only time the library would not require electric lighting), the project would result in a mere 1.8% reduction in natural light. On the "worst-case scenario" partly cloudy days (when the library requires electrical lighting), the project would result in a 4% reduction in natural light. This is far less than the reduction in light caused by the library's own intentional use of window dark shades, which reduce light by -14.2% on clear sunny days and -24.5% on partly cloudy days.

While the Project Sponsor does not debate the neighbor's point that natural light to the library is important, natural light is not protected by CEQA and there is substantial evidence in the record demonstrating that the project will have no significant effect on the Library's natural light, particularly as compared to the library's intentional reduction of light by using dark grey window shades. The neighbors have not provided any facts to refute the findings of the Daylight Impact Analysis, nor did the appeal documents even acknowledge the details of the report's findings. Additional study of this issue, as requested by the neighbors, is not necessary. As such, the Planning Commission's approval of the Categorical Exemption for the project must be upheld.

b. <u>The Project will not have a significant impact on the Golden Gate Valley Library's solar arrays.</u>

The neighbors state that the Categorical Exemption should be overturned because the project will reduce the effectiveness of the library's solar arrays. As admitted by the neighbors in their appeal brief, impacts to neighboring solar panels are not protected by any state or local law, including CEQA. Thus, even if significant, an impact to solar panels is not an environmental effect recognized by CEQA that can overturn a Categorical Exemption.

Further, there is already substantial evidence in the record that the project will not have a significant effect on the Library's solar arrays. The Shading Impact Analysis specifically analyzed the project's impact to the library's solar arrays and found it minimally reduces captured radiation, a reduction of $178 of solar energy production annually.[2] The neighbors have not provided any facts to refute the findings of the Shading Impact Analysis.

[2] The neighbors' appeal states that the shading will increase by 69%, which is misleading. To clarify, 17.4% of the surface area of the east array is shaded and the project would cause an increase to 29.4%, an 11.7% increase. For the west array, 22.7% of the surface area is already shaded and the project would cause an increase to 28.4%, a 6%

Additionally, the presence of solar arrays on a neighboring property is not an "unusual circumstance" that would warrant overturning a Categorical Exemption. Solar panels are extremely common and their presence on a neighboring property is not atypical for a minor residential addition. Overturning a Categorical Exemption based upon a small reduction to the efficacy of a neighboring solar panel would have the practical effect of eliminating the Class 1 exemption for minor additions and would require full Environmental Impact Reports for many small residential projects.

Thus, because neighboring solar panels are not regulated by CEQA, there is substantial evidence in the record demonstrating that the project will have no significant effect to the library's solar arrays, and no unusual circumstances are present at the property; the Planning Commission's approval of the Categorical Exemption for the project must be upheld.

c. <u>The project is consistent with state and local laws regarding solar access.</u>

The neighbors also argue that the project will have a significant effect on the environment because the project is inconsistent with two General Plan policies that encourage the development of ordinances to promote renewable energy resources.[3] Both of the policies cited by the neighbors are aspirational and direct City agencies to take steps toward developing ordinances, but no such ordinances yet exist. The neighbors admit as much, noting in their appeal that that the "Planning Department is correct that there are not yet state or local laws on point to address protecting solar access." The approved project will not have any impact on the ability of City agencies to develop future ordinances regarding solar access and, as confirmed by the neighbor's appeal, there are currently no state or local laws addressing solar access that the project can conflict with. As such, the project does not have a significant effect on the environment and the Categorical Exemption must be upheld.

The neighbors' appeal also references the 1978 Solar Shade Act that prohibits the planting of new trees that will shade solar generation on adjacent properties, stating that this shows property owners should not be able to block a neighbor's solar panels with their building. Despite the fact this law is completely inapplicable as the Solar Shade Act regulates trees and not residential development, the Solar Shade Act only prohibits trees that "cast a shadow greater than 10 percent of the collector absorption area." (1978 Cal. Stat. ch. 1366. § 25982). Here, the Shading Impact Analysis shows that the project will only cast a shadow over 8.6% of the Library's solar arrays. Thus, even if the Solar Shade Act were applicable to residential development, the project here would not meet the shadow threshold to be regulated under the Act.

---

increase in total surface area shaded. In total, the project would increase total surface area of the Library's array shaded by 8.4%.

[3] The appellants cite Environmental Protection Policy 16.1 ("Develop land use policies that will encourage the use of renewable energy sources") and 16.2 ("Remove obstacles to energy conservation and renewable energy systems in zoning and building codes.")

III. Conclusion

There is substantial evidence in the record that this residential addition will not have a significant impact to the library's natural light or solar arrays. The neighbors' appeal does not provide any evidence to refute the exhaustive analysis undertaken by independent experts and relies solely on narrative argument. As such, the Planning Commission's approval of the Categorical Exemption for the development of the Project Sponsor's multi-generational family home must be upheld.

Very truly yours,

ZACKS, FREEDMAN & PATTERSON, PC

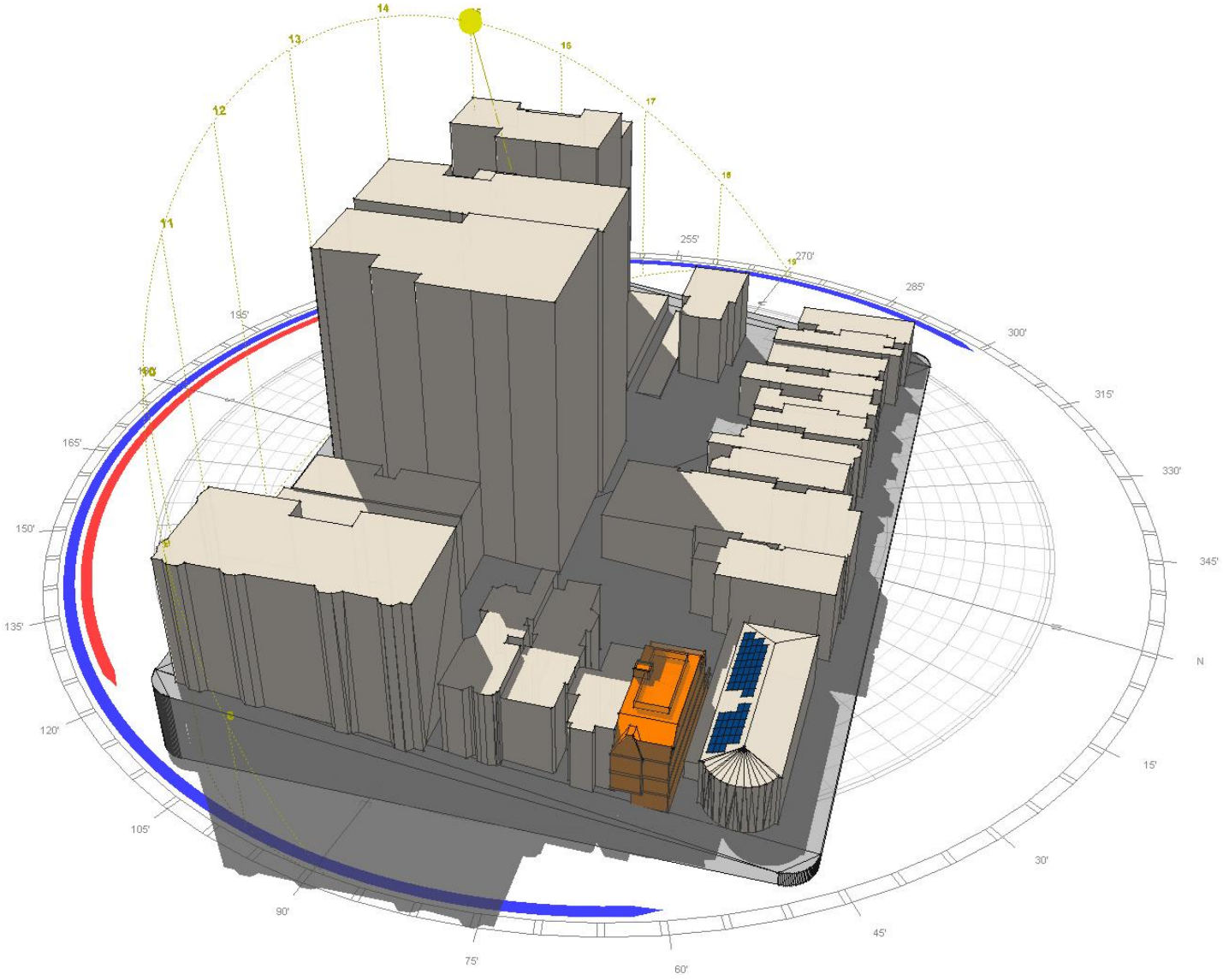
Ryan J. Patterson

cc: Kei Zushi, Senior Environmental Planner
kei.zushi@sfgov.org

SHADING IMPACT ANALYSIS REPORT

FOR **2653 OCTAVIA STREET** | DECEMBER 1ST 2019

Revised APRIL 11th 2021*



Report prepared by
Olivier PENNETIER, LEED AP, CEA
SYMPHYSIS
Bioclimatic Design Consulting
olivier@symphysis.net

TABLE OF CONTENTS

I. INTRODUCTION & ANALYSIS SUMMARY

SYMPHYSIS was asked to perform a shading analysis to assess the shading impact of a proposed vertical and horizontal addition, located at 2651-2653 Octavia Street, upon the adjacent building's photovoltaic system located on the roof of 1801 Green Street.

After performing the analysis, SYMPHYSIS concludes that **the proposed project at 2653 Octavia Street would reduce solar radiation by an average of 5.8%** on the existing photovoltaic system at 1801 Green Street.

The report herein describes the proposed project, as well as the methodology used for the shading analysis along with its results. ■

Olivier A. Pennetier, MArch, LEED AP
SYMPHYSIS Principal
12/01/2019

CABEC
California Association of Building Energy Consultants
CERTIFIED ENERGY ANALYST
CEA# R16-19-20172

This 04/09/2021 revision separated the original Table 1 into two separate tables: Table 1 for the solar radiation results, and Table 2 for the shading percentage results. As originally presented, the *percentage reductions* in shading percentages were too easily misinterpreted for shading percentage. This version only shows the difference in shading percentage: 9% from existing conditions to proposed conditions. An appendix was also added to present the solar radiation tables for the impact calculations on the solar array .

Our services consist of professional opinions and conclusions developed in accordance with generally accepted environmental design, solar engineering and daylighting design principles and practices. Our conclusions and recommendations are based on the information provided by the clients, USGS Digital Elevation Model and publicly available Geographic Information System database.

II. PROJECT LOCATION

The proposed project is located at 2653 Octavia Street, in the Northeastern corner of the Pacific Heights neighborhood, block 0554, lot 002. ■

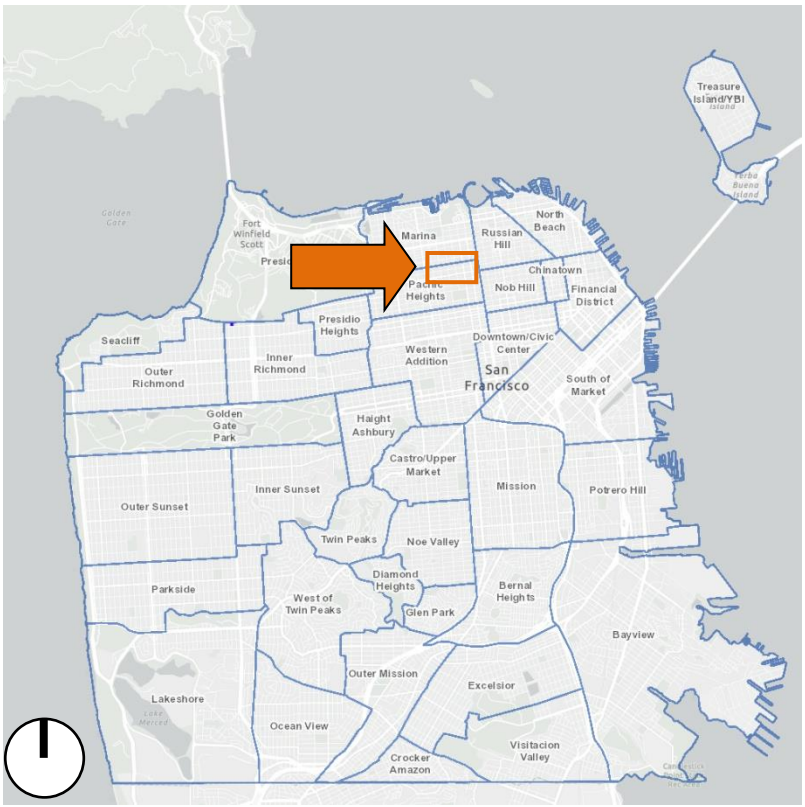


FIGURE 1: LOCATION MAP

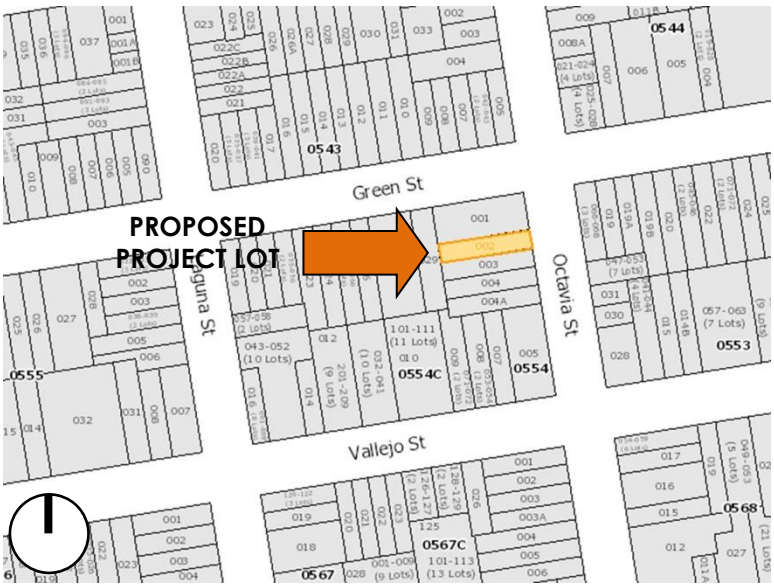


FIGURE 2: BLOCK MAP

III. PROPOSED PROJECT DESCRIPTION

The proposed design features a new fourth story addition on top of an existing 3 story single family residence. The new addition will increase the height of the building to 39'-10 ½".

The following images show the 3D massing models for the existing conditions and proposed design. ■

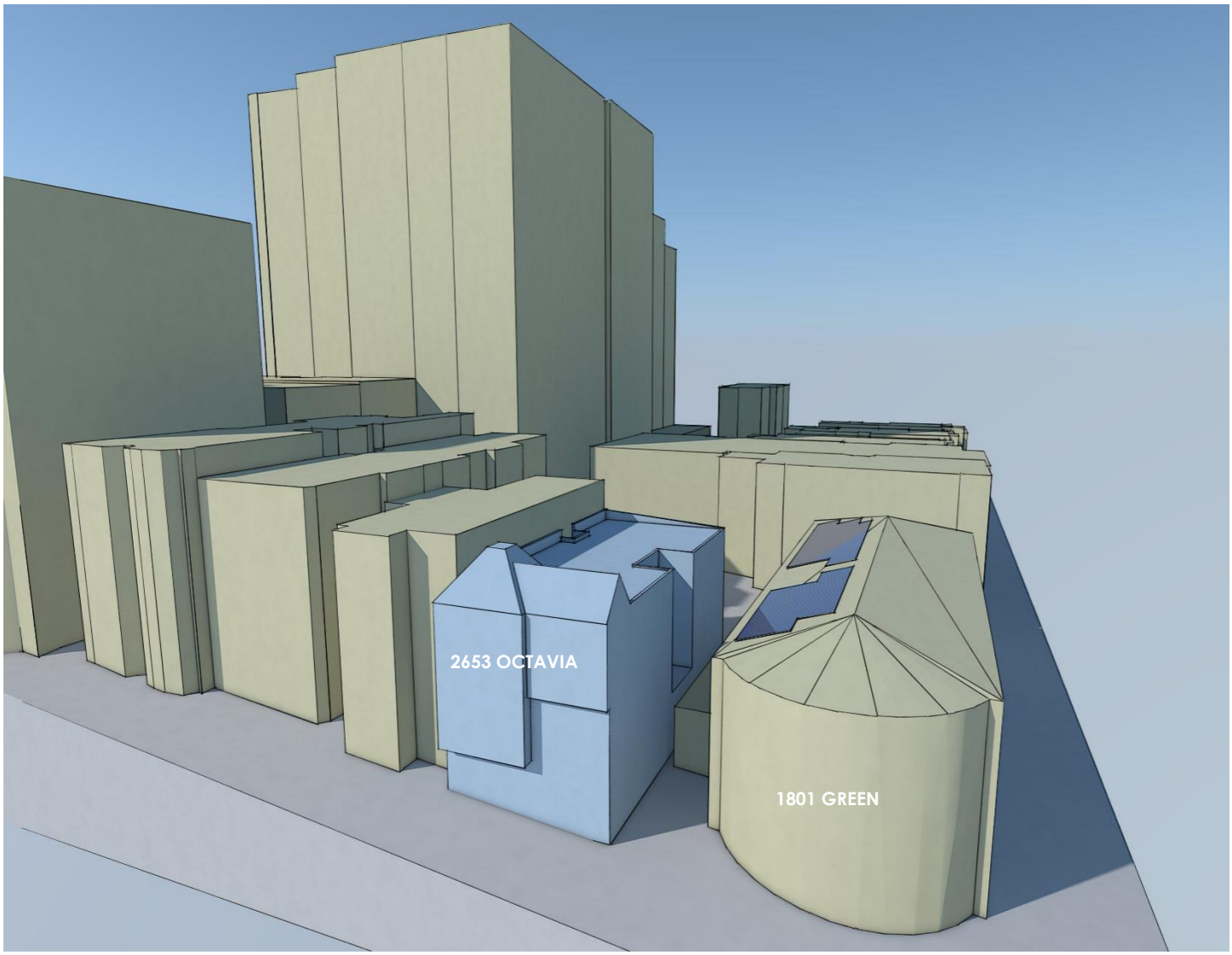


FIGURE 3: 3D MASSING MODEL OF THE EXISTING CONDITIONS.

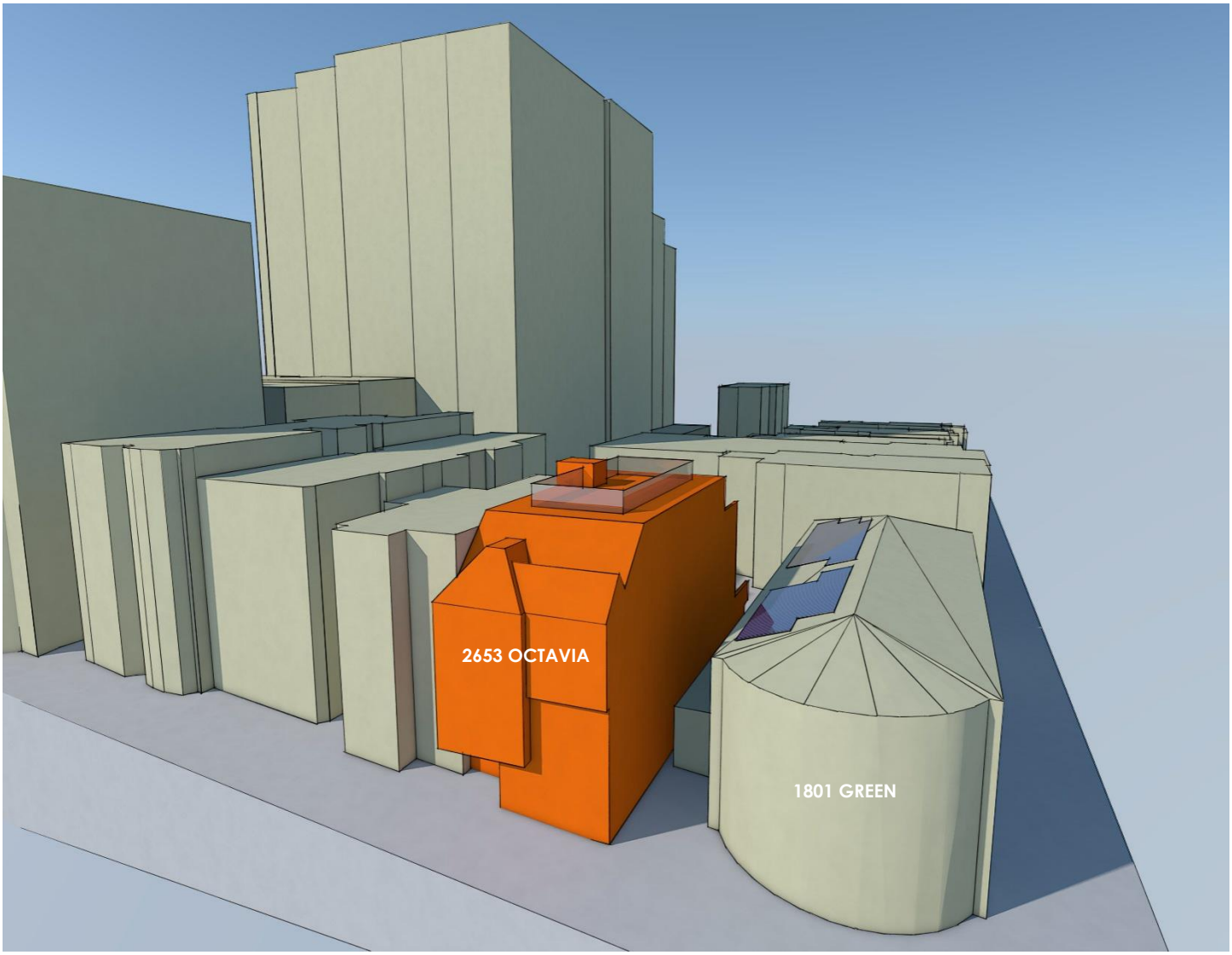


FIGURE 4: 3D MASSING MODEL OF THE PROPOSED DESIGN.

IV. ANALYSIS METHODOLOGY & FINDINGS

SYMPHYSIS utilized various tools to develop this shading impact analysis. Here is a breakdown of the analysis process, and the tools used at each stage of the analysis:

1) A 3D model of the existing and proposed conditions was created within a CAD software (ArchiCAD), using the 2D drawings from the architect of the proposed project. The surrounding buildings were constructed from the latest GIS (Geographic Information System) layer of San Francisco building footprints obtainable at data.sfgov.org. The heights of the buildings were derived from photogrammetric model from Google Earth. The size of the photovoltaic system located on the roof of the neighbor at 1801 Green Street was estimated from aerial photographs.

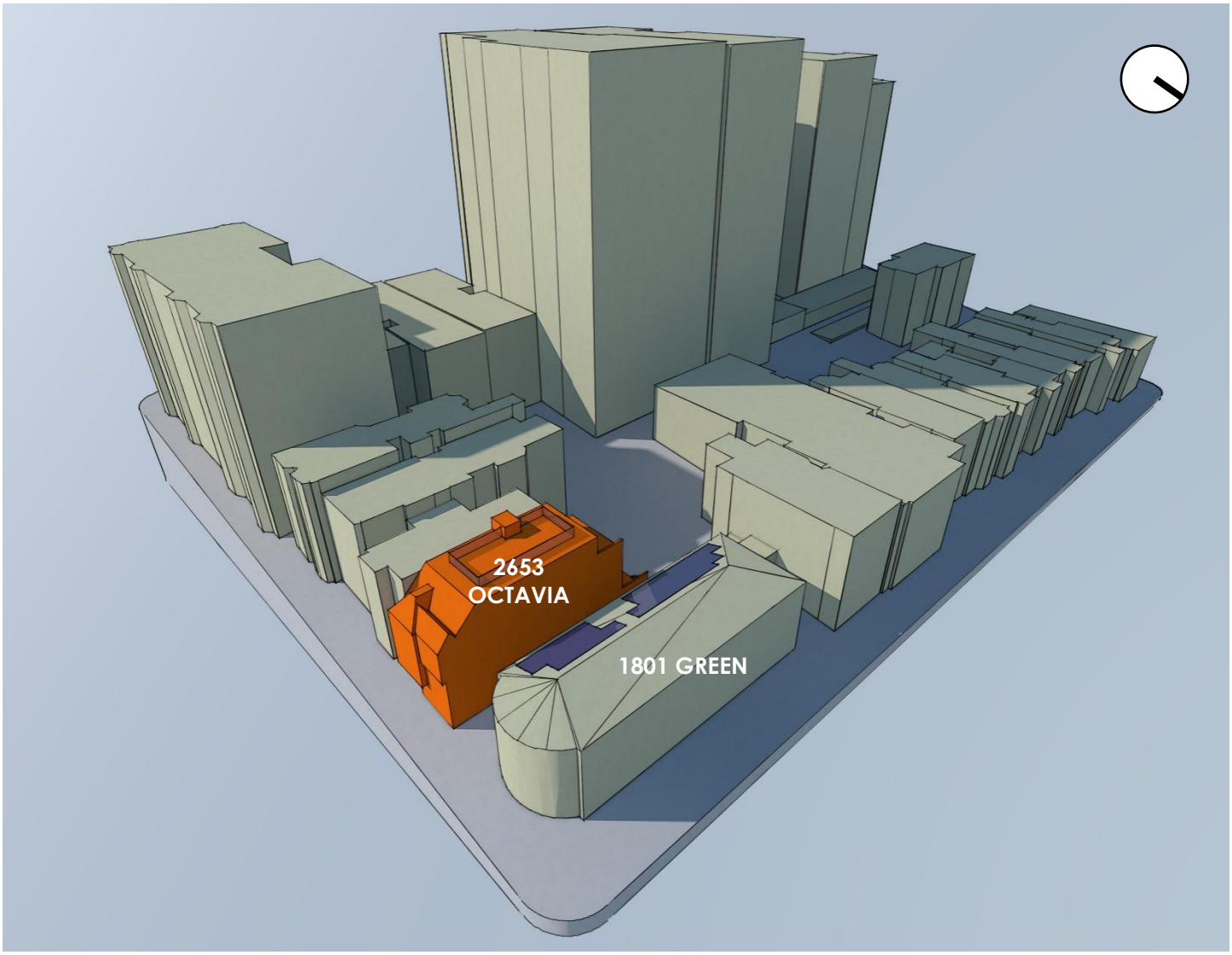


FIGURE 5: 3D MASSING MODEL OF PROPOSED CONDITIONS.

FIGURE 6: AERIAL PHOTOGRAPH OF THE PHOTOVOLTAIC SYSTEM AT 1801 GREEN STREET DATED 03/26/2018.

2) The 3D models were sent into a building performance analysis tool called Autodesk Ecotect to calculate shading and solar radiation specifically on the photovoltaic system of the Golden Gate Valley Library at 1801 Green Street. First the calculations were computed for the existing conditions, then another pass with the proposed design. The difference between the two conditions highlights the areas of the photovoltaic system that are most impacted by the proposed project. The calculations were set for the entire year, and every hours of the day.

After compiling all the results of the various analyses, SYMPHYSIS concludes that the proposed project at 2653 Octavia Street would reduce the amount of solar radiation on the existing photovoltaic system by 5.8%. Most of the shading impact would occur on the lower right (southeastern) panels located closer to the proposed project, and mainly between Fall and Winter, time at which solar radiation is weakest. At most, the solar array would see a 19.8% decrease in solar radiation on lower solar panels. Tables 1 & 2 below highlight these numbers.

TABLE 1: PERCENTAGE DECREASE IN GLOBAL HORIZONTAL RADIATION AT ROOF LEVEL

	EXISTING CONDITIONS	PROPOSED CONDITIONS	PERCENTAGE DIFFERENCE
SOLAR RADIATION	4,514 Wh/m^2/day	4,253 Wh/m^2/day	**-5.8%**
East Array	4,596 Wh/m^2/day	4,152 Wh/m^2/day	-9.7%
West Array	4,452 Wh/m^2/day	4,331 Wh/m^2/day	-2.7%

TABLE 2: INCREASE IN SHADING ON PHOTOVOLTAIC ARRAY

	EXISTING CONDITIONS	PROPOSED CONDITIONS	DIFFERENCE
SHADING	20.4%	29.0%	**+8.6%**
East Array	17.4%	29.4%	+12%
West Array	22.7%	28.7%	+6.0%

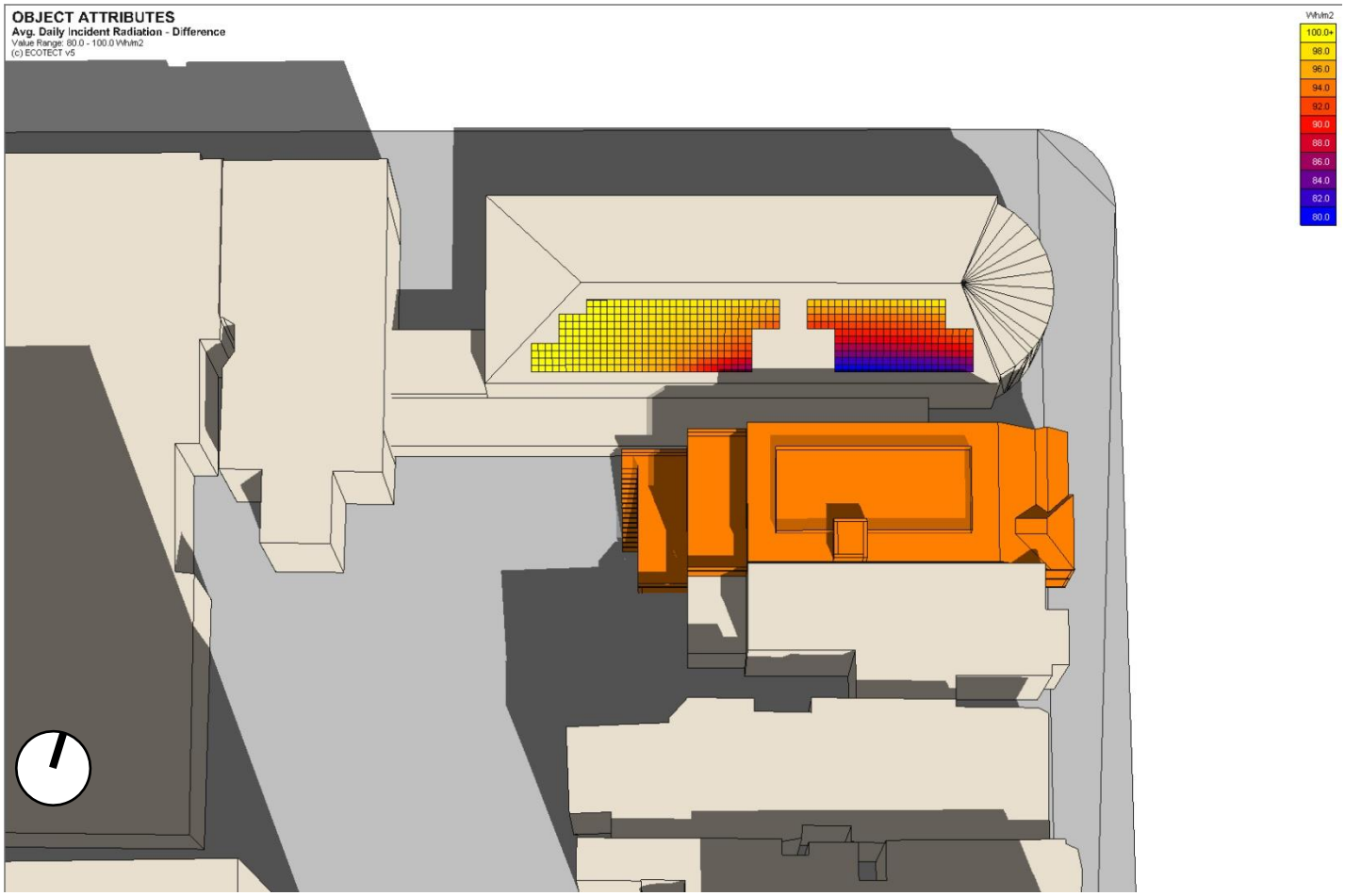


FIGURE 7: PERCENTAGE OF ANNUAL SOLAR RADIATION RECEIVED WITH THE PROPOSED PROJECT COMPARED TO EXISTING CONDITIONS.

Of note, the photovoltaic system is broken down into two arrays. The Eastern array is quite a bit more impacted than the Western array, with a 69% increase in shading on the Eastern array versus a 26.4% shading increase on the Western array. Similarly, the Eastern array would see its incident solar radiation reduced by 9.7%, versus a solar radiation decrease of 2.7% on the Western array.

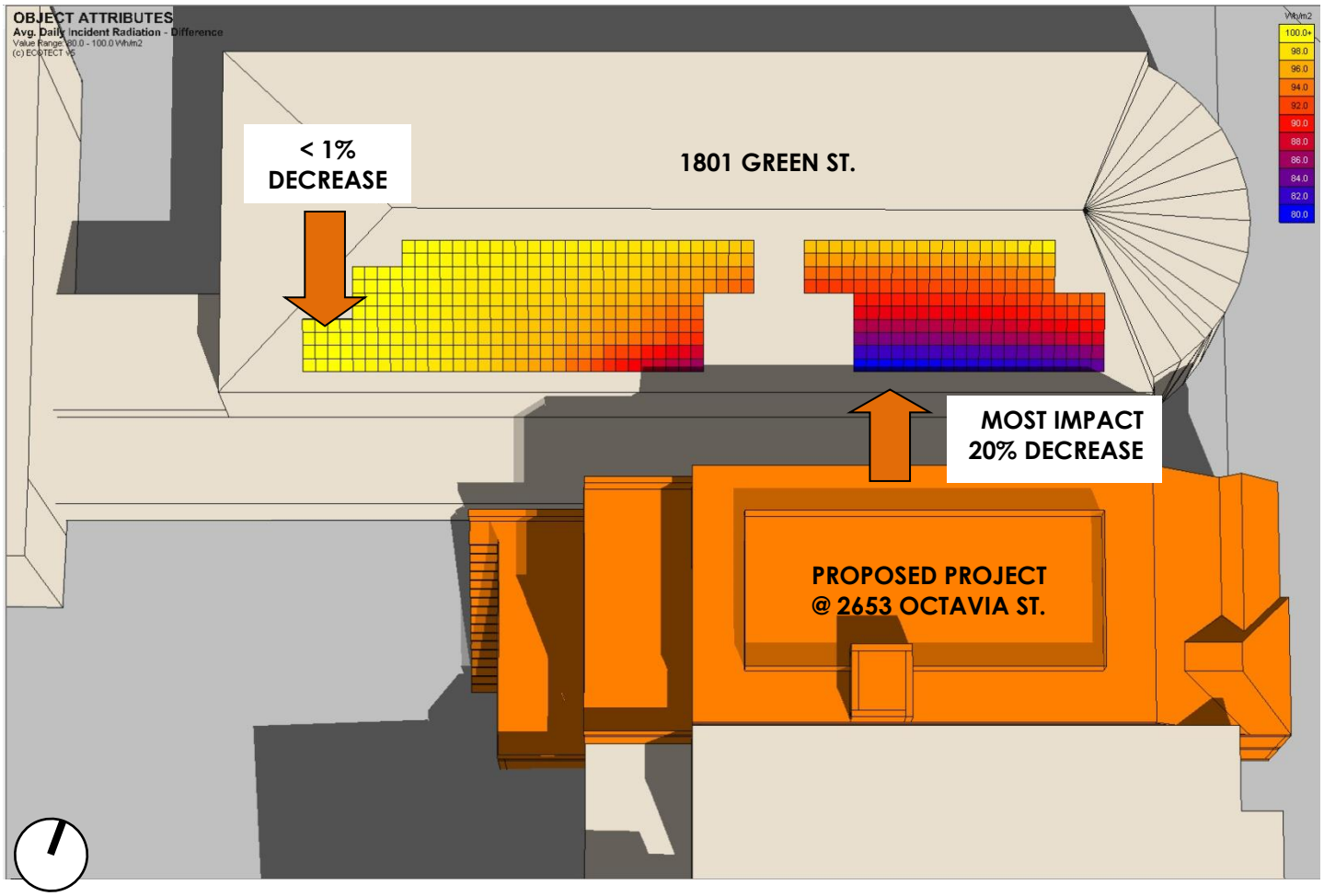


FIGURE 8: PERCENTAGE OF ANNUAL SOLAR RADIATION RECEIVED WITH THE PROPOSED PROJECT COMPARED TO EXISTING CONDITIONS.

The following diagram shows the shading difference between the existing and proposed conditions, highlighting in bright yellow the newly created shade on 1801 Green Street on the worst day of the year (the lowest sun angle on December 21st, and the highest solar radiation at solar noon).

The last diagram shows areas of the project's volume having the most impact on the shading of solar radiation upon the solar arrays. The brightest the dots, the highest-intensity solar radiation are being blocked by the project. As expected, the Northern-most areas of the fourth story addition's volume have the most impact on the solar panels. ■

A01

WINTER SOLSTICE SHADING ANALYSIS – PROPOSED vs EXISTING

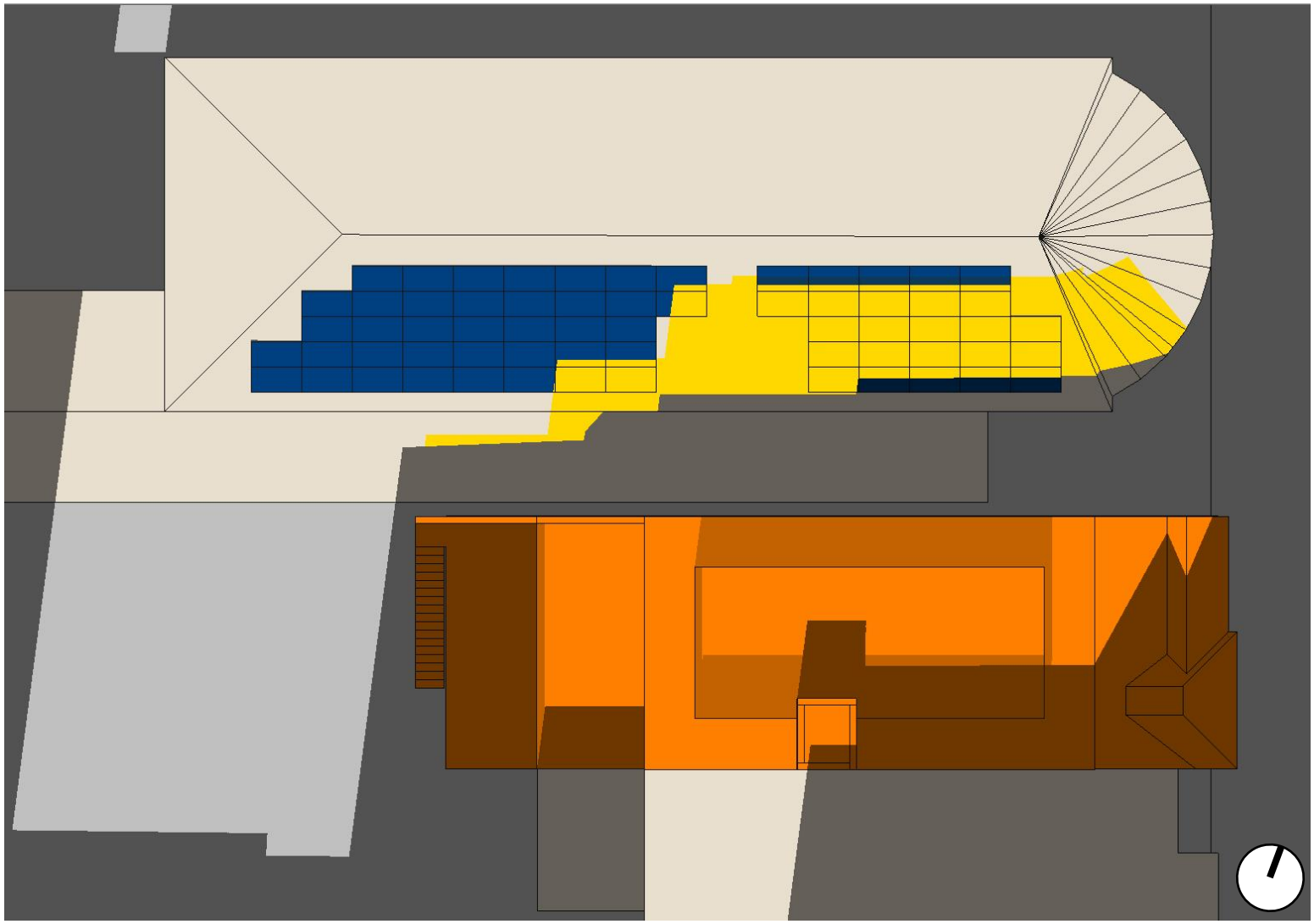
DECEMBER 21ST

12:00 PM Noon

PROPOSED PROJECT
@ 2653 OCTAVIA ST.

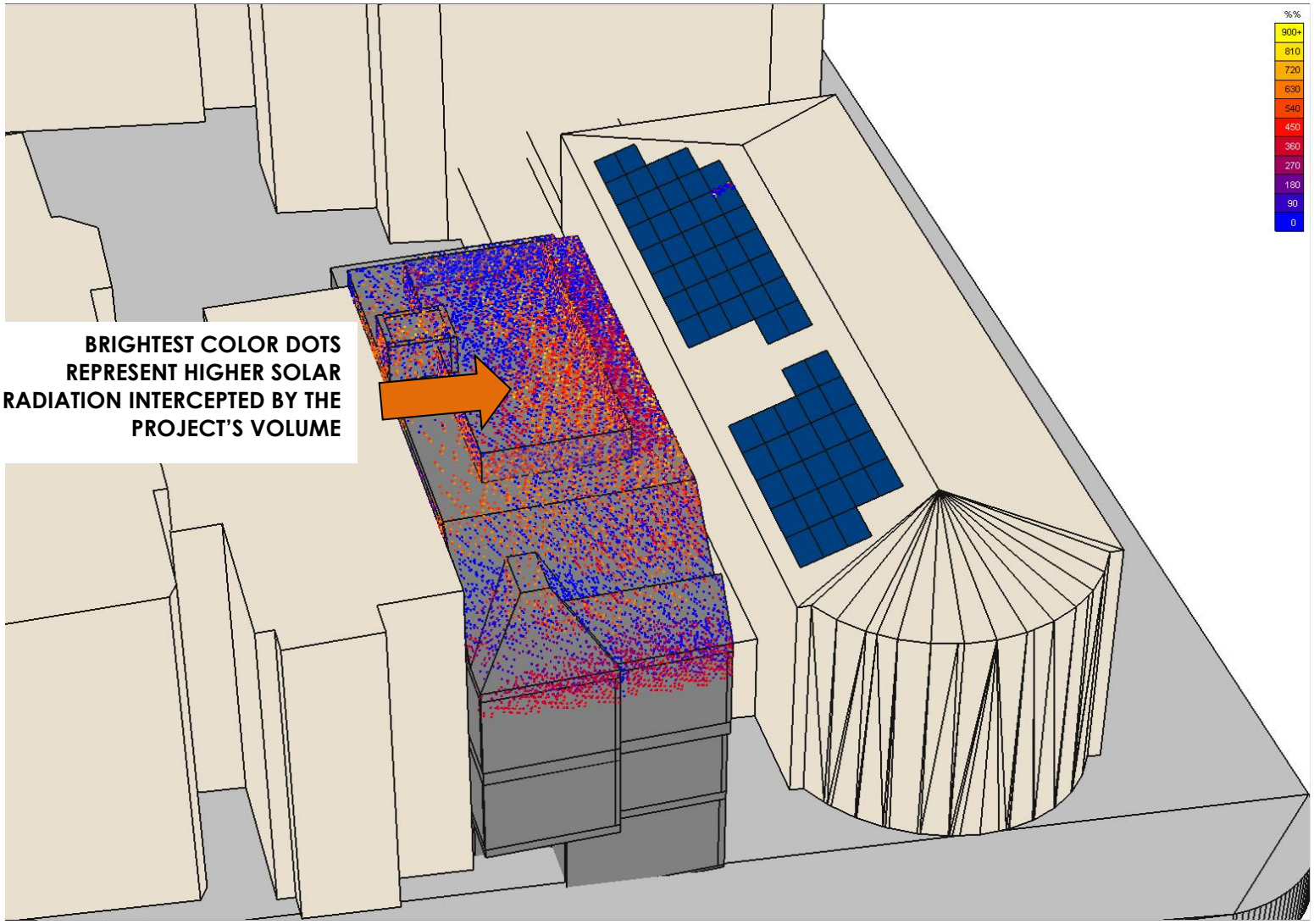
EXISTING SHADING

ADDITIONAL SHADING
@ 1801 GREEN ST.



A02

VOLUME IMPACT

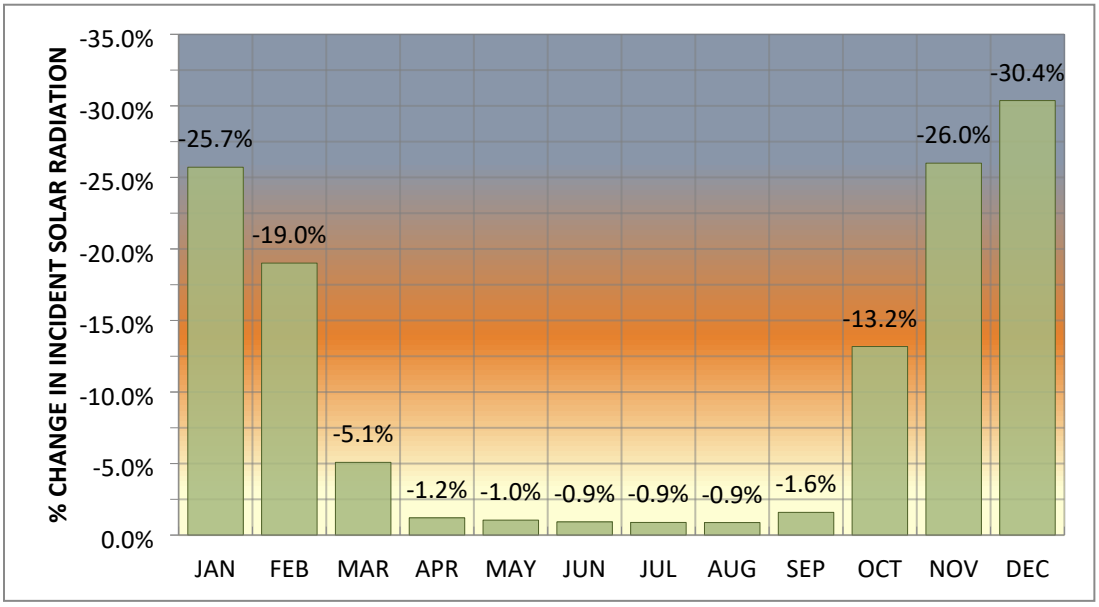


V. APPENDICES

A. IMPACT ON INCIDENT SOLAR RADIATION ON THE SOLAR ARRAY

The following table and graph show how the proposed project would impact the library's solar array electrical generation mainly from October to March, with the highest electrical production occurring May through September.

INCIDENT SOLAR RADIATION (Wh/m2/DAY)			
ANALYSIS PERIOD	EXISTING CONDITIONS	PROPOSED CONDITIONS	% Δ
JAN	1,709	1,270	-25.7%
FEB	2,748	2,226	-19.0%
MAR	4,476	4,248	-5.1%
APR	5,683	5,614	-1.2%
MAY	6,212	6,147	-1.0%
JUN	6,792	6,730	-0.9%
JUL	6,765	6,705	-0.9%
AUG	6,323	6,267	-0.9%
SEP	5,755	5,663	-1.6%
OCT	3,571	3,100	-13.2%
NOV	2,316	1,714	-26.0%
DEC	1,667	1,161	-30.4%
YEAR	4,514	4,253	-5.8%



B. TIMES OF IMPACT

The following table shows the various times throughout the year when the proposed project would impact the library's solar array, and how many days are recorded with no impact for the noted hour of the day:

	EXISTING	PROPOSED	Δ
SHADE @ 9AM	30-Sep 18-Mar	8-Sep 5-Apr	
NO-IMPACT DAYS	**197**	**157**	40
SHADE @ 10AM	15-Nov 5-Feb	12-Sep 2-Apr	
NO-IMPACT DAYS	**284**	**164**	120
SHADE @ 11AM	29-Nov 21-Jan	18-Sep 30-Mar	
NO-IMPACT DAYS	**313**	**173**	140
SHADE @ NOON	14-Dec 4-Jan	23-Sep 24-Mar	
NO-IMPACT DAYS	**345**	**184**	161
SHADE @ 1PM	25-Sep 21-Mar	26-Sep 21-Mar	
NO-IMPACT DAYS	**189**	**190**	-1
SHADE @ 2PM	1-Oct 16-Mar	1-Oct 15-Mar	
NO-IMPACT DAYS	**200**	**201**	-1
SHADE @ 3PM	6-Oct 11-Mar	6-Oct 11-Mar	
NO-IMPACT DAYS	**210**	**210**	0

C. SOLAR RADIATION CALCULATIONS

The following tables the estimated power generated by the library's solar array under existing and proposed conditions; the calculation were done with the PVWatts tool from the National Renewable Energy Laboratory (NREL):

USING PVWATTS 4.85 kWh/M2/DAY @ 0°TILT BASE RADIATION

EXISTING CONDITIONS: 15 kWh SYTEM, 20.4% SHADING

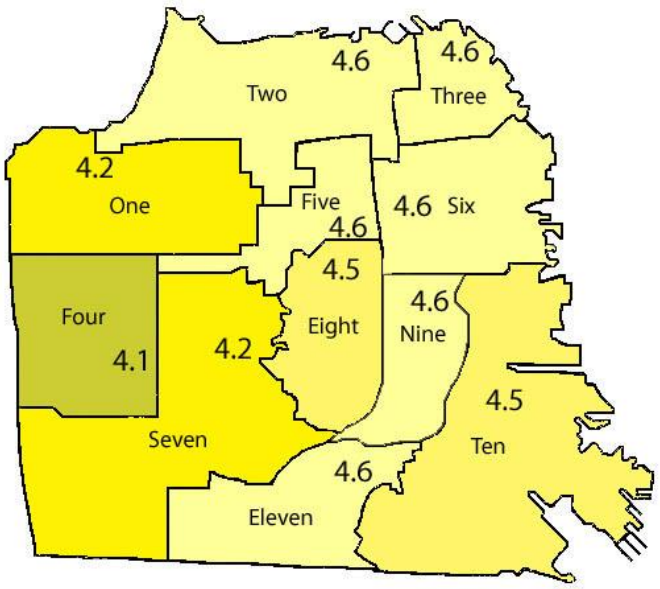
Month	Solar Radiation (kWh / m2 / day)	AC Energy (kWh)	Value ($)
January	3.14	961	86
February	3.98	1101	99
March	5.53	1,653	148
April	6.72	1,948	175
May	7.05	2,090	188
June	7.39	2,108	189
July	6.92	2,020	181
August	6.42	1,869	168
September	6.26	1,745	157
October	5.05	1,487	134
November	3.89	1,131	102
December	3.15	964	87
Annual	5.46	**19,077**	**$1,714**

PROPOSED CONDITIONS: 15kWh SYSTEM, 29.0% SHADING

Month	Solar Radiation (kWh / m2 / day)	AC Energy (kWh)	Value ($)
January	3.14	856	77
February	3.98	981	88
March	5.53	1,473	132
April	6.72	1,736	156
May	7.05	1,862	167
June	7.39	1,879	169
July	6.92	1,800	162
August	6.42	1,665	150
September	6.26	1,555	140
October	5.05	1,325	119
November	3.89	1,007	90
December	3.15	858	77
Annual	5.46	**16,997**	**$1,527**

The difference in generated electricity is 2,080 kWh per year, equivalent to a loss of $187 using the $0.09/kWh commercial rate.

When using the solar radiation data of 4.6 kWh/m2/day (on horizontal surface) recorded from weather stations located in the neighborhood of the library rather than the higher radiation data from NREL (based on SFO airport data), **the loss is minimized to $178 per year**:



INSOLATION MAP RECORDED IN SAN FRANCISCO (kWh/m2/day). DATA BY SFOG.US

USING SFOG.US 4.6 kWh/M2/DAY @ 0°TILT BASE RADIATION

EXISTING CONDITIONS: 15 kWh SYTEM, 20.4% SHADING

	Solar Radiation	AC Energy	Value
Month	(kWh / m2 / day)	(kWh)	($)
January	2.98	913	82
February	3.77	1,046	94
March	5.24	1,570	141
April	6.37	1,851	166
May	6.69	1,986	179
June	7.01	2,003	180
July	6.56	1,919	172
August	6.09	1,776	160
September	5.94	1,658	149
October	4.79	1,413	127
November	3.69	1,074	97
December	2.99	916	83
Annual	5.18	**18,123**	**$1,628**

PROPOSED CONDITIONS: 15kWh SYSTEM, 29.0% SHADING

	Solar Radiation	AC Energy	Value
Month	(kWh / m2 / day)	(kWh)	($)
January	2.98	813	73
February	3.77	932	84
March	5.24	1,399	125
April	6.37	1,649	148
May	6.69	1,769	159
June	7.01	1,785	161
July	6.56	1,710	154
August	6.09	1,582	143
September	5.94	1,477	133
October	4.79	1,259	113
November	3.69	957	86
December	2.99	815	73
Annual	5.18	**16,147**	**$1,451**

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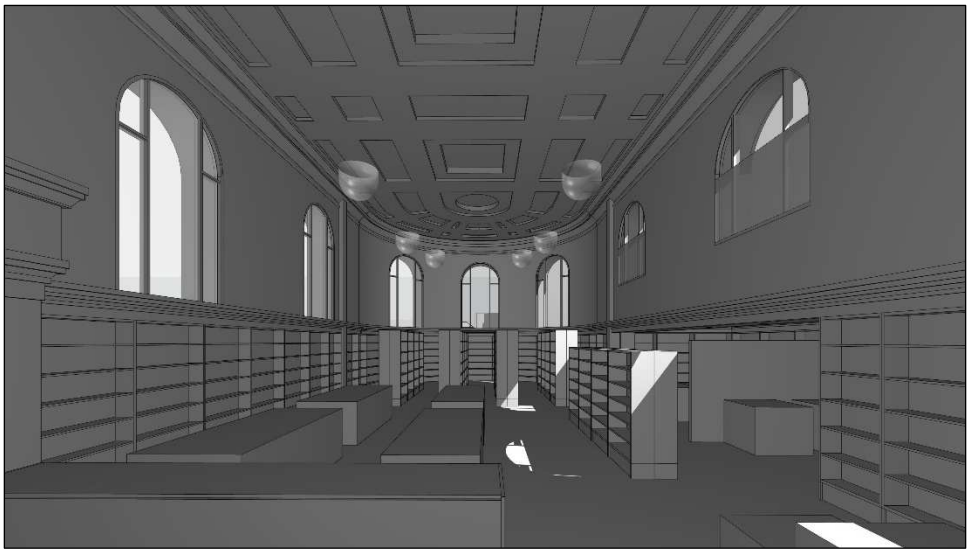
ILLUMINATION IMPACT ANALYSIS REPORT

DAYLIGHT & ELECTRICAL LIGHTS ILLUMINATION STUDY

FOR **Golden Gate Valley Library**



Report prepared by
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SYMPHYSIS
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TABLE OF CONTENTS

I. INTRODUCTION

SYMPHYSIS was hired to conduct a study to determine the normal use conditions in the Golden Gate Valley Library, and analyze the illumination impact of the proposed project at 2651-53 Octavia.

Using photographic evidence from photos taken in all years 2013-2021 (see appendix), it was determined that during open hours, the normal use condition in the library is **natural light from the windows AND illumination from electric lights**. To determine the electric light data for the simulation model, SYMPHYSIS used the library's architectural permit plans and fixture schedule dated May 21, 2009, and verified with site photographs.

SYMPHYSIS analyzed 2,406 individual points on the interior of the library's main reading room for the following conditions:

- Overcast sky (no sun) December 21st for all times of day, to represent the worst-case daylight conditions.
- Partly cloudy sky for September 21st at 9:00 am, 12:00 pm, and 3:00 pm, to represent the mid-season case daylight conditions.
- Clear sky for June 21st at 9:00 am, 12:00 pm, and 3:00 pm, to represent the best daylight conditions.

The report herein presents the results of this analysis. ■

Olivier A. Pennetier, M.Arch, LEED AP
SYMPHYSIS Principal

CABEC
California Association of Building Energy Consultants
CERTIFIED ENERGY ANALYST
CEA# R16-19-2017

Our services consist of professional opinions and conclusions developed in accordance with generally accepted environmental design, solar engineering and daylighting design principles and practices. Our conclusions and recommendations are based on the information provided by the clients, USGS Digital Elevation Model and publicly available Geographic Information System database.

II. ANALYSIS SUMMARY

SYMPHYSIS concludes that in the NORMAL library use condition (daylight + electrical lights), the proposed project at 2651-53 Octavia will have a minimal impact on the illumination levels and no impact on visual comfort experienced by the patrons and staff of the library.

The daily average differences in illumination levels between the existing and proposed condition **are -1.0% for overcast skies, -4.2% for partly cloudy skies and -2.0% for clear skies**. Note that in all cases, the illumination levels in the Golden Gate Valley Library are within the minimum CIE (International Commission on Illumination) recommended levels for library use, between 300 and 500 lux.

TABLE **1**: AVERAGE ILLUMINANCE (LIGHT LEVELS) VALUES FOR THE **ENTIRE LIBRARY MAIN FLOOR** (LUX).

SKY	**OVERCAST SKY**	**PARTLY CLOUDY SKY**			**CLEAR SKY**		
DAY	*ALL DAYS OF YEAR*	*SEPTEMBER 21ST*			*JUNE 21ST*		
TIME	ALL TIMES OF DAY	9:00 AM	*9:00 AM*	*12:00 PM*	*03:00 PM*	12:00 PM	03:00 PM
EXISTING AVG LUX	398.45	503.20	522.81	434.23	1,095.97	808.71	669.67
PROPOSED AVG LUX	394.30	492.53	474.48	429.47	1,078.30	775.67	668.41
% DIFFERENCE	-1.0%	-2.1%	-9.2%	-1.1%	-1.6%	-4.1%	-0.2%
DAILY AVERAGE	**-1.0%**	**-4.2%**			**-2.0%**		

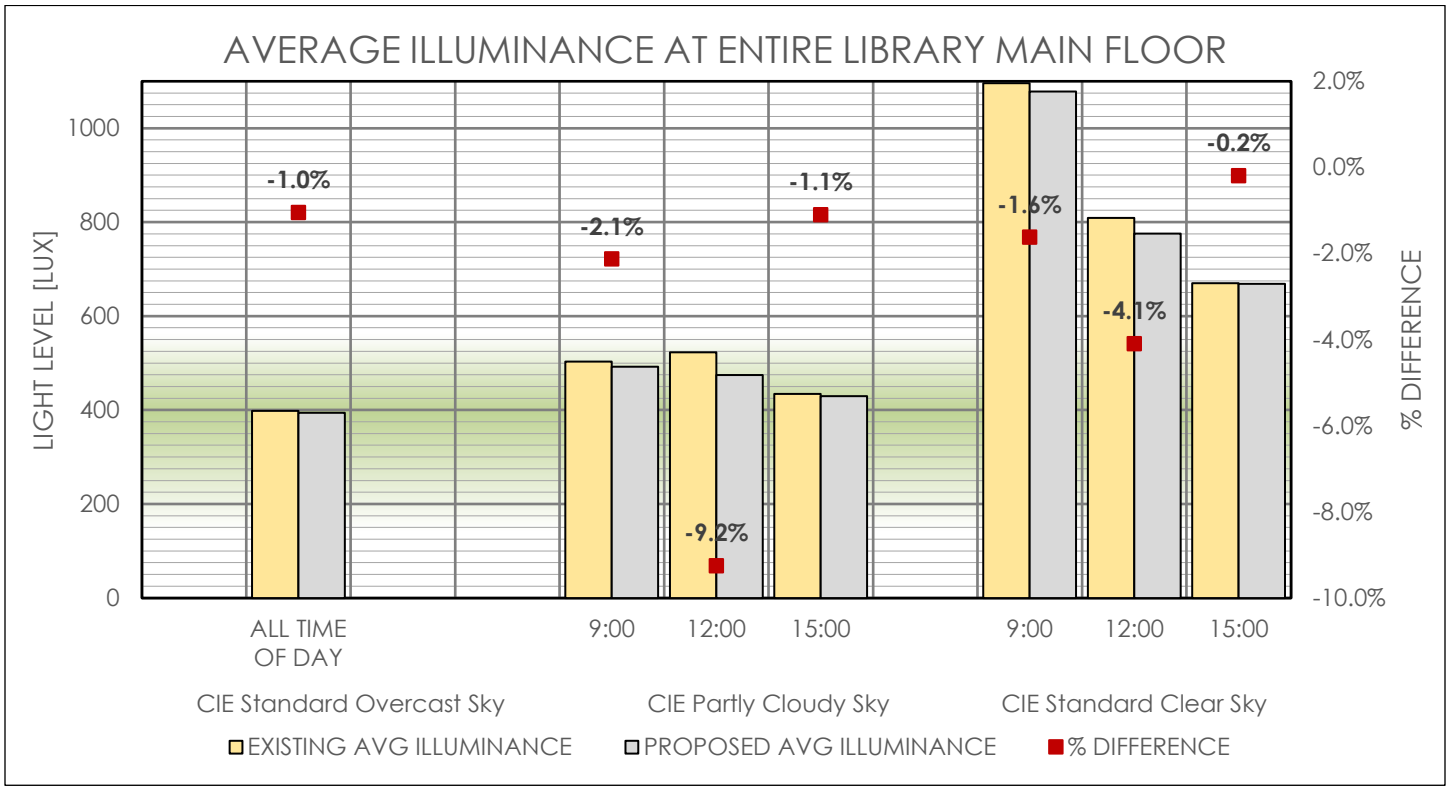


FIGURE **1**: GRAPH OF AVERAGE ILLUMINANCE VALUES FOR THE **ENTIRE LIBRARY MAIN FLOOR.**

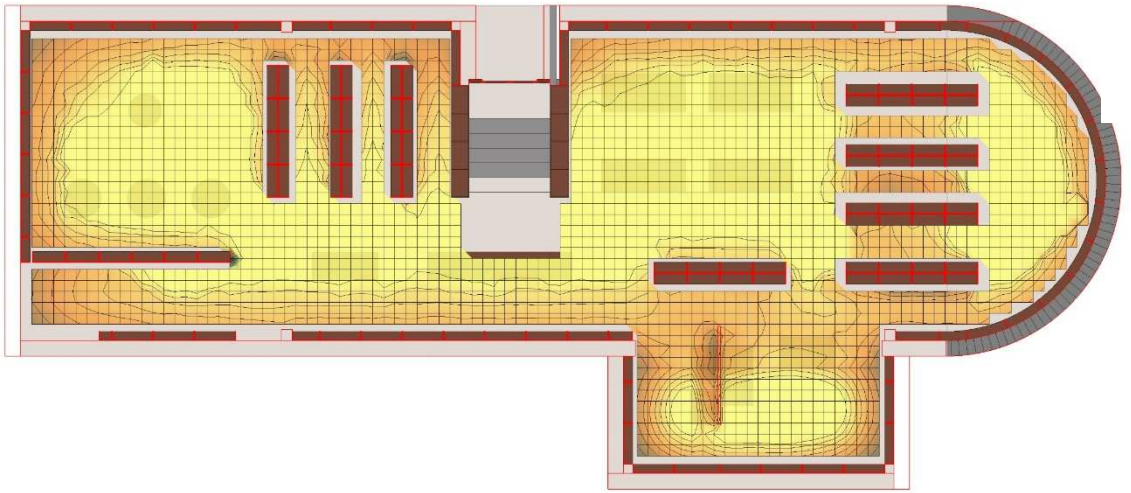
A01

DAYLIGHT + ELECTRICAL LIGHT LEVELS [LUX]

SEPTEMBER 21ST PARTLY CLOUDY SKY – 12:00 PM [worst case]

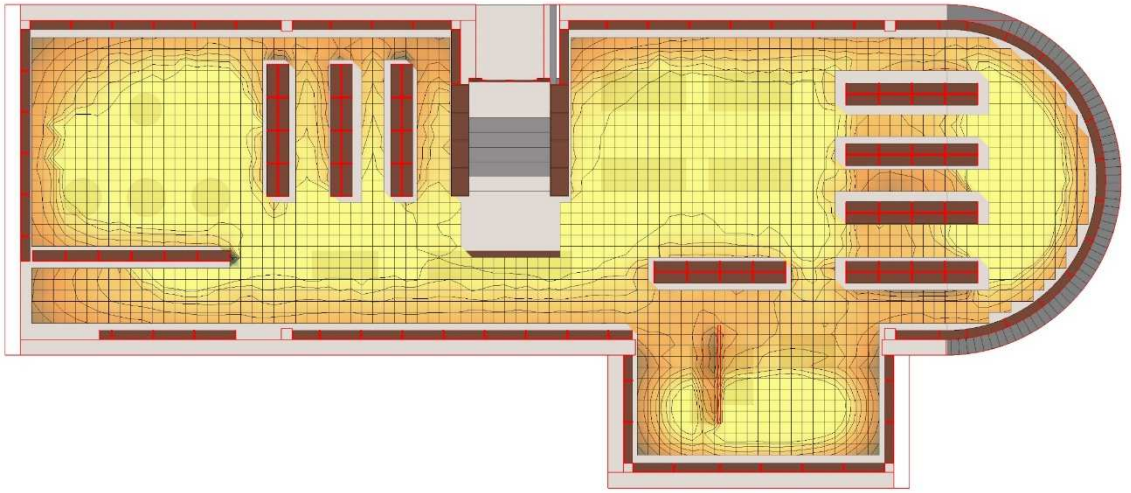
EXISTING CONDITIONS

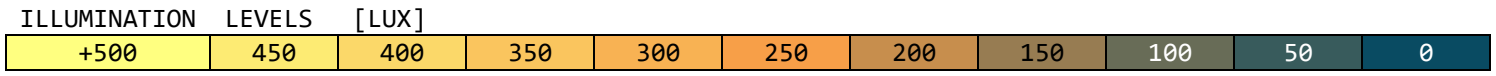
AVERAGE = 522.81 LUX



PROPOSED CONDITIONS

AVERAGE = 474.48 LUX





III. APPENDICES

A. EVIDENCE THAT ELECTRIC LIGHTS ARE TURNED ON UNDER NORMAL CONDITIONS

Here is a list of links pointing to numerous photographs showing electric lights on within the library, between 2013 and 2021:

Google Street Views:

Dec 2013	Feb 2014	Jan 2015	Jun 2016	Feb 2017	Mar 2018	April 2019
	June 2014	Oct 2015		Sept 2017	Jun 2018	
	Sept 2014	Nov 2015		Dec 2017		
	Aug 2014					
	Nov 2014					

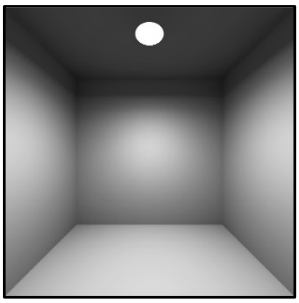
Library Patrons Internet Photographs:

Sept 2017	Feb 2019	Feb 2021
	April 2019	

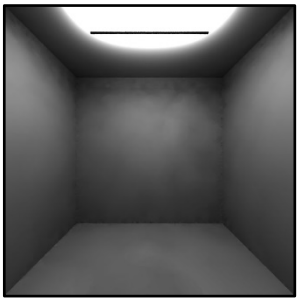
Project Sponsor's Photographs – verified by Metadata:

Owner Photos

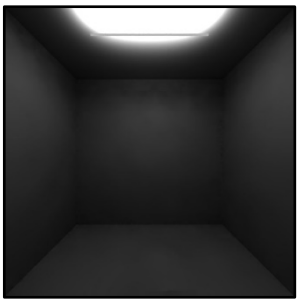
B. IES LUMINAIRE FILES USED IN THE MODEL (PER PERMITED TITLE 24 LTG-2-C)



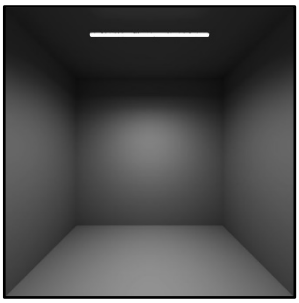
Luminaire ID on plan = **F1**
Lamp type = CF42DT
Lumen = 3,200
Luminaire # = 14
Lamp /Luminaire = 4
Note = Main pendant fixtures at library room



Luminaire ID on plan = **F2**
Lamp type = F28T5
Lumen = 2,900
Luminaire # = 58
Lamp /Luminaire = 1
Note = Fluorescent uplights around library walls

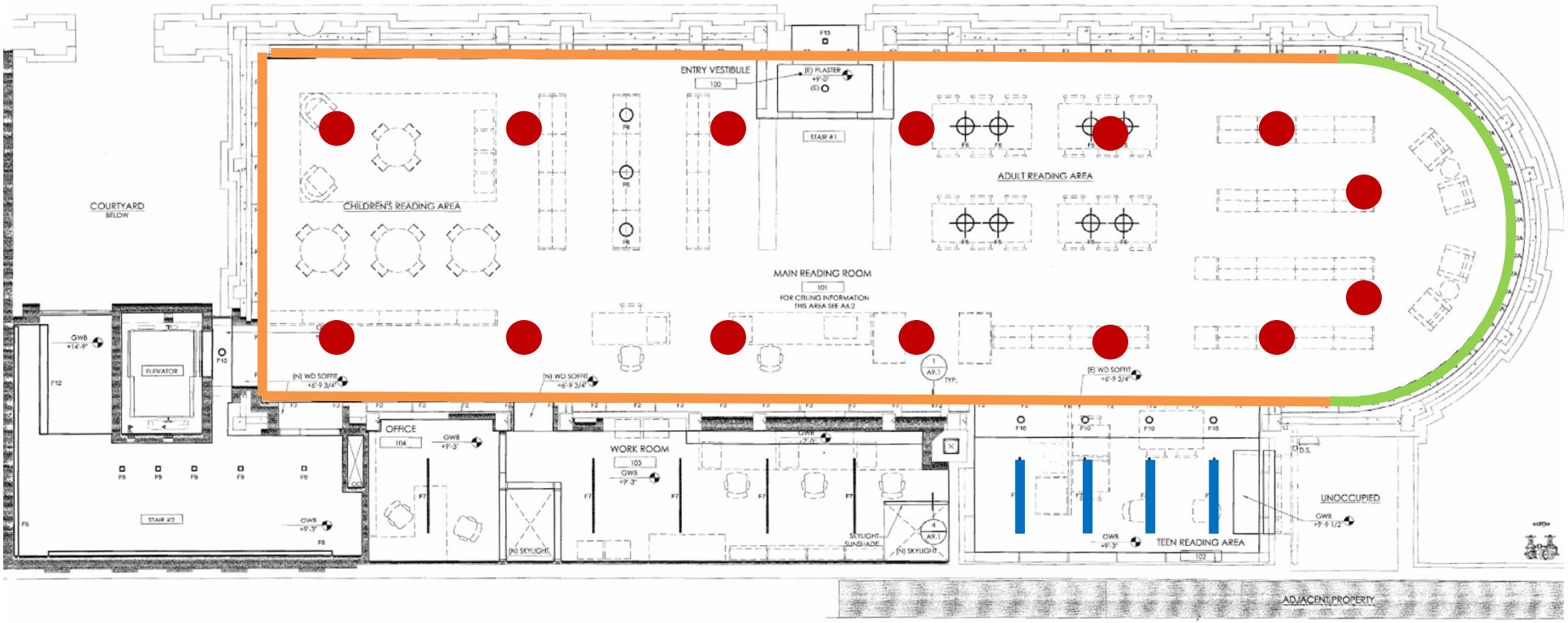


Luminaire ID on plan = **F2A**
Lamp type = F14T5
Lumen = 1,350
Luminaire # = 30
Lamp /Luminaire = 1
Note = Fluorescent uplights at library East walls

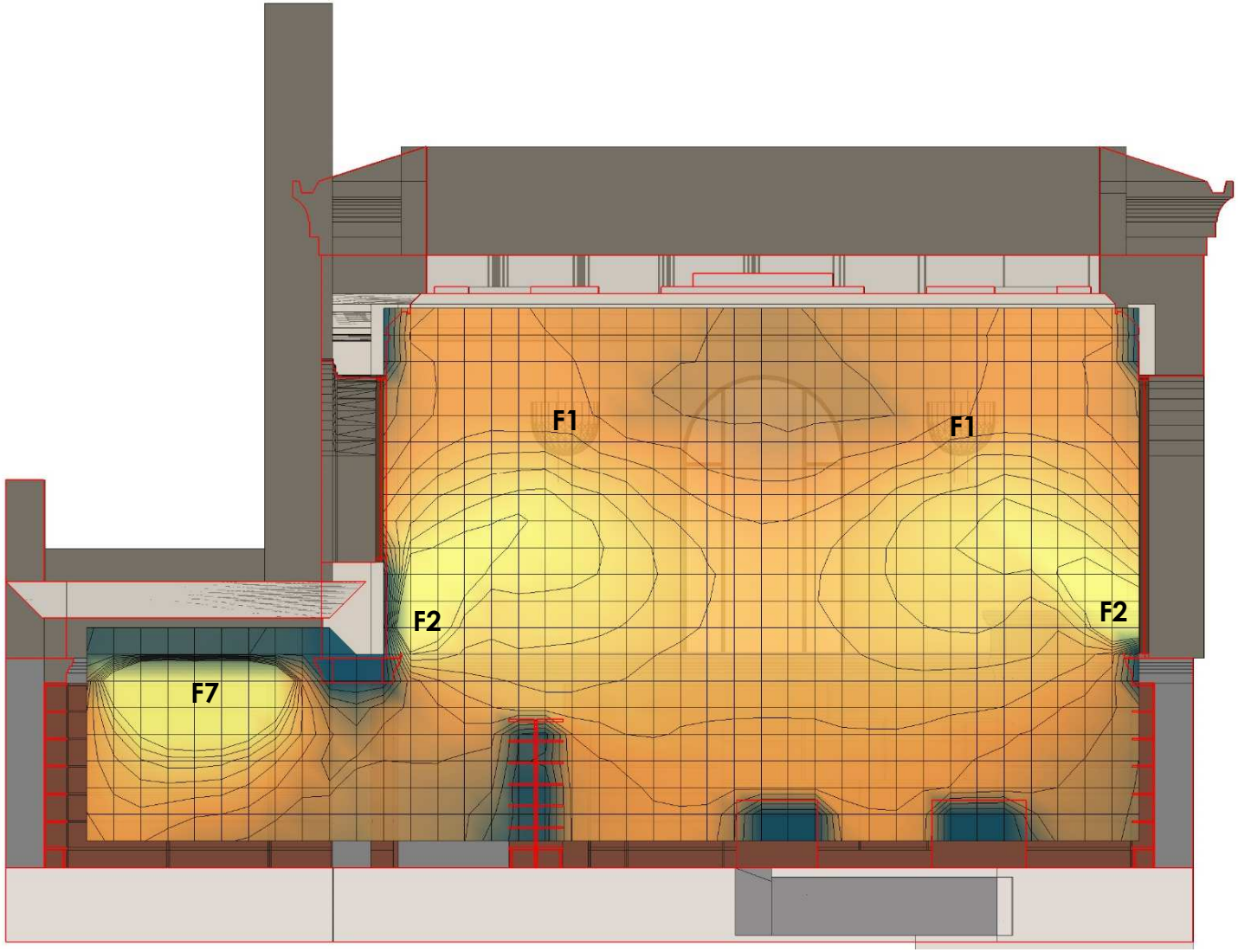


Luminaire ID on plan = **F7**
Lamp type = F24T5 (replaces F21T5 with similar lumen output)
Lumen = 2,000
Luminaire # = 4
Lamp /Luminaire = 4
Note = Fluorescent pendants at Teen's reading room

C. LUMINAIRES LOCATION



ELECTRICAL PLAN FROM ARCHITECTURAL PERMIT SET, SHEET A6.1, AND LUNMINAIRES USED IN THE SIMULATION



ELECTRIC LIGHT CROSS-SECTIONAL DISTRIBUTION AT THE LIBRARY FLOOR. F1 & F2A BEYOND CUTTING PLANE.

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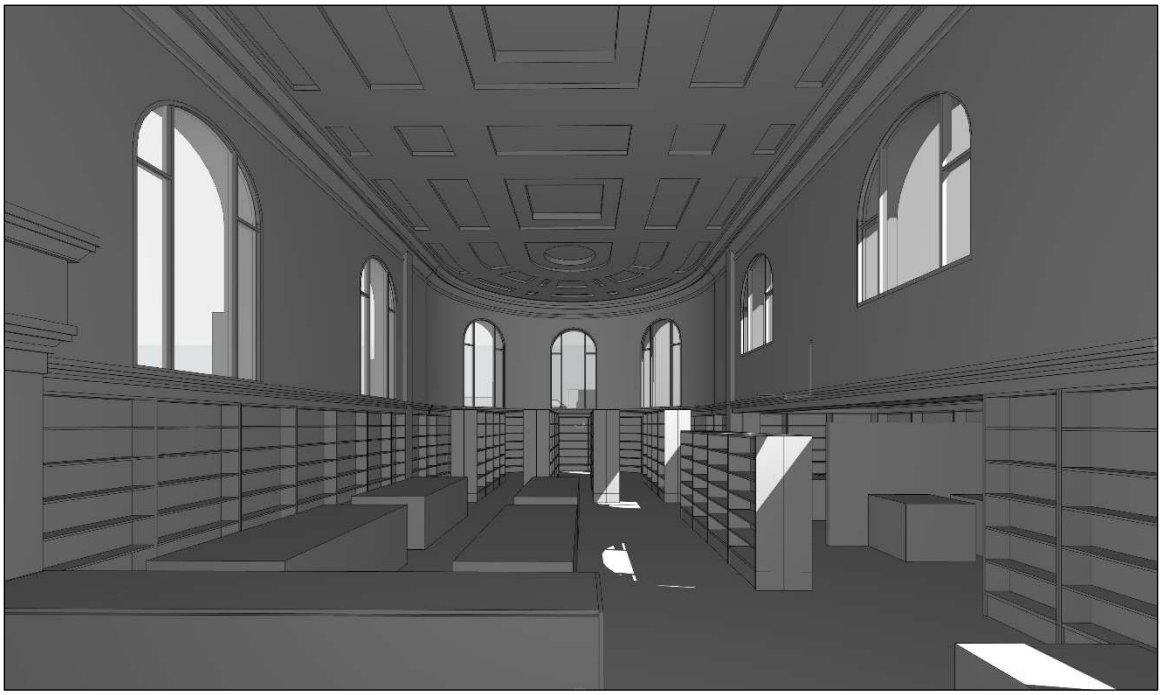
DAYLIGHT IMPACT ANALYSIS REPORT

FOR **2651-53 OCTAVIA STREET** | DECEMBER 13TH 2020



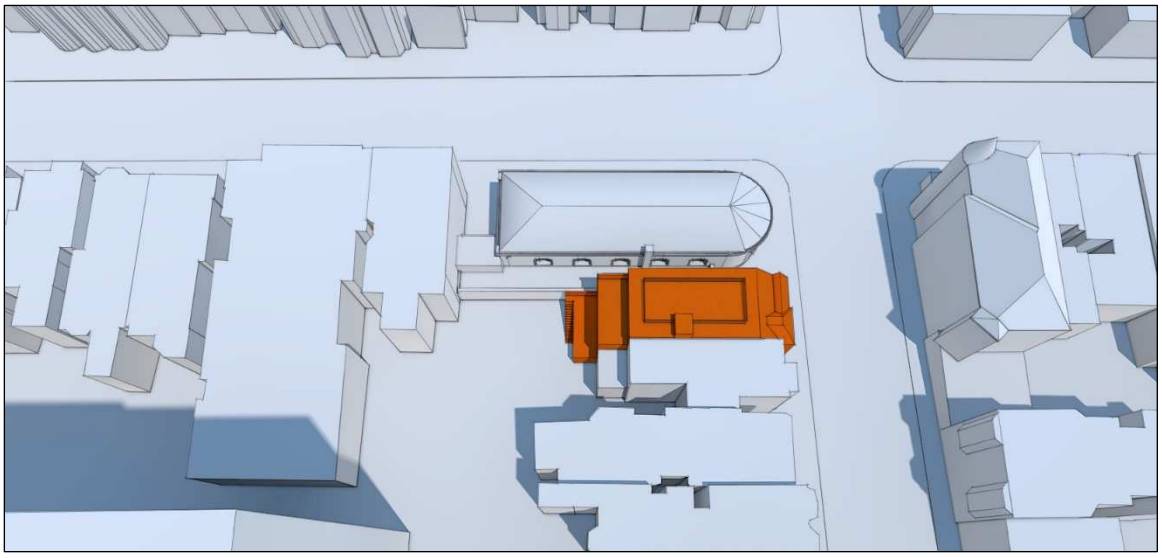


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TABLE OF CONTENTS

I. INTRODUCTION & ANALYSIS SUMMARY

SYMPHYSIS was asked to perform a daylight study to assess the impact of the proposed addition project at 2651-2653 Octavia Street (Planning Department Case # 2018-011022PRJ) upon the natural light (daylight) levels and quality at the main floor reading room of the Golden Gate Valley Branch library. Although this study is not required for the proposed project's environmental review under CEQA, it was conducted in response to some of the comments made at the July 28, 2020 public hearing before the San Francisco Board of Supervisors regarding the appeal of the categorical exemption issued by the San Francisco Planning Department on September 5, 2019 for the 2651-2653 Octavia Street project.

After performing the daylighting analysis, SYMPHYSIS concludes that **the proposed project at 2653 Octavia Street will not reduce the visual comfort of the library's patrons** in any significant way, when compared to the current existing conditions. The proposed project reduces the libraries' averaged illumination levels minimally for clear sky (-1.8%), overcast sky (-4%), and partly cloudy sky (-11.1%). For both the overcast and partly cloudy skies, the existing conditions require electrical illumination at ALL times to provide the necessary illumination recommended for libraries (300-500 LUX), thus even the small reductions with the proposed condition are irrelevant.

The report herein describes the proposed project, the methodology used for the daylight study, and the results that led to the conclusion. ■

Olivier A. Pennetier, M.Arch, LEED AP
SYMPHYSIS Principal
12/13/2020

CABEC
California Association of Building Energy Consultants
CERTIFIED ENERGY ANALYST
CEA# R16-19-2017

Our services consist of professional opinions and conclusions developed in accordance with generally accepted environmental design, solar engineering and daylighting design principles and practices. Our conclusions and recommendations are based on the information provided by the clients, USGS Digital Elevation Model and publicly available Geographic Information System database.

II. PROJECT LOCATION

The proposed project is located at 2653 Octavia Street, in the Northeastern corner of the Pacific Heights neighborhood, block 0554, lot 002. ■

FIGURE **1**: LOCATION MAP

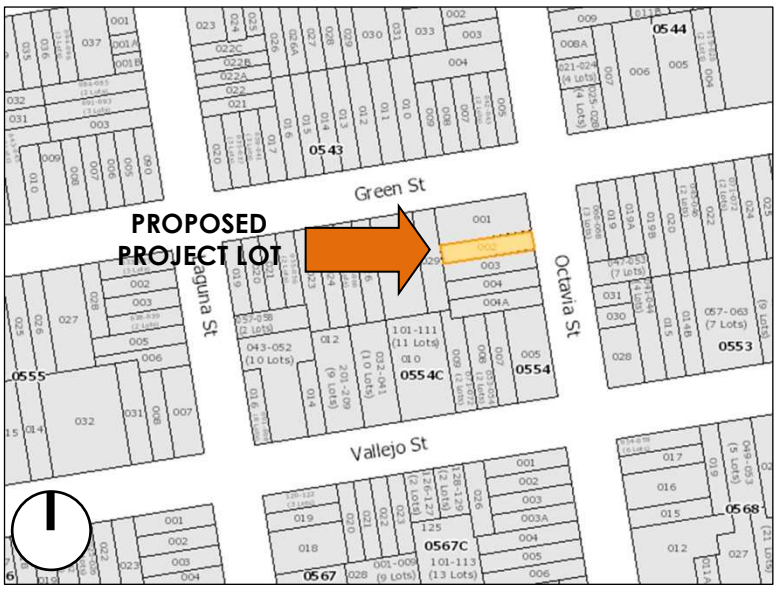


FIGURE **2**: BLOCK MAP

III. PROPOSED PROJECT DESCRIPTION

The proposed design features a new fourth story addition on top of an existing 3 story single family residence. The new addition will increase the height of the building to 39'-10 ½", and the building will be pushed toward the rear yard by an additional 19.5 feet at the lowest level.

The following images show the 3D massing models for the existing conditions and proposed design. ■

FIGURE **3**: 3D MASSING MODEL OF THE EXISTING CONDITIONS.

FIGURE **4**: 3D MASSING MODEL OF THE PROPOSED DESIGN.

FIGURE **5**: AERIAL VIEW OF THE CURRENT CONDITIONS AS OF 07/06/2020.

IV. ANALYSES RESULTS & CONCLUSIONS

This chapter presents the analyses results and conclusions of the study. The methodology used for each analysis is explained briefly in this chapter; for the full detail and description, see chapter V, Analysis Methodology.

A. DAYLIGHT AUTONOMY

The Daylight Autonomy analysis calculates the percentage of time, during the libraries open hours (10am - 8 pm), **when supplemental light is NOT required** to meet acceptable illuminance levels. The IES recommended values for libraries are 300 LUX for stacks and 500 LUX for task and reading areas. To calculate an overall difference at the highest-level analysis, we used an average of 400 LUX as our target, and averaged all light sensor points (2,406) in the library.

In the table below, the analysis shows that there is minimal difference (-1.7 %) between the existing and proposed conditions, when NO supplemental lighting is necessary.

TABLE **1**: DAYLIGHT AUTONOMY VALUES FOR THE **ENTIRE LIBRARY MAIN FLOOR**.

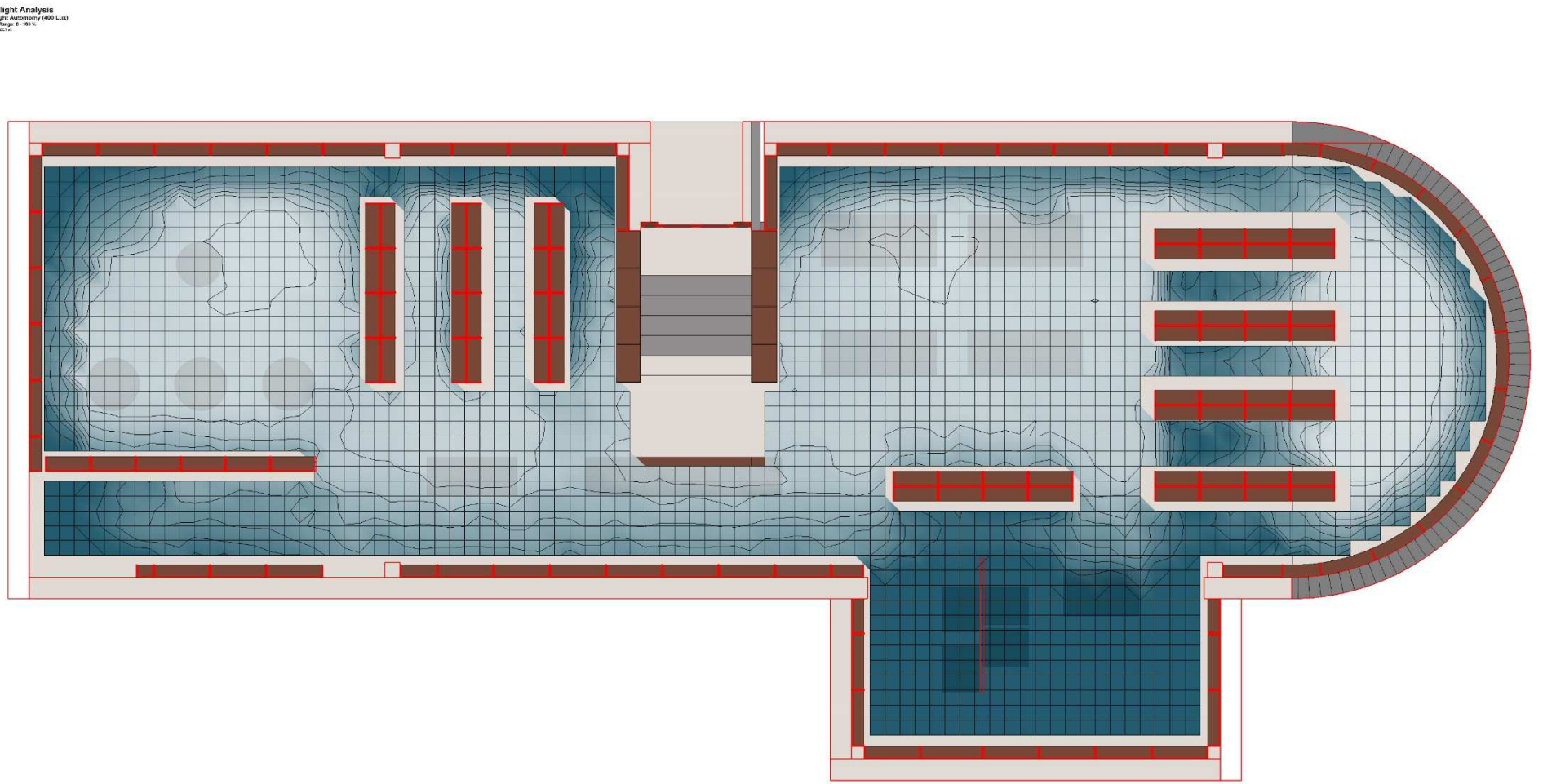
EXISTING DAYLIGHT AUTONOMY	47.80%
PROPOSED DAYLIGHT AUTONOMY	46.97%
% DIFFERENCE	**-1.7%**

The diagrams below – **A01** (existing) and **A02** (proposed) show the analysis of the annual Daylight Autonomy in specific locations of the library. The darkest blue means that the space requires artificial light 100% of the time and the lightest white means that the space requires supplemental light 0% of the time. Note that there is very little difference between the existing and the proposed conditions and that artificial light is required in all areas of the library at a minimum of 52.2% of the time.

A01

DAYLIGHT AUTONOMY FOR EXISTING CONDITIONS

TARGET:400 LUX 10:00 AM – 08:00 PM | MONDAY THROUGH SUNDAY | ALL YEAR



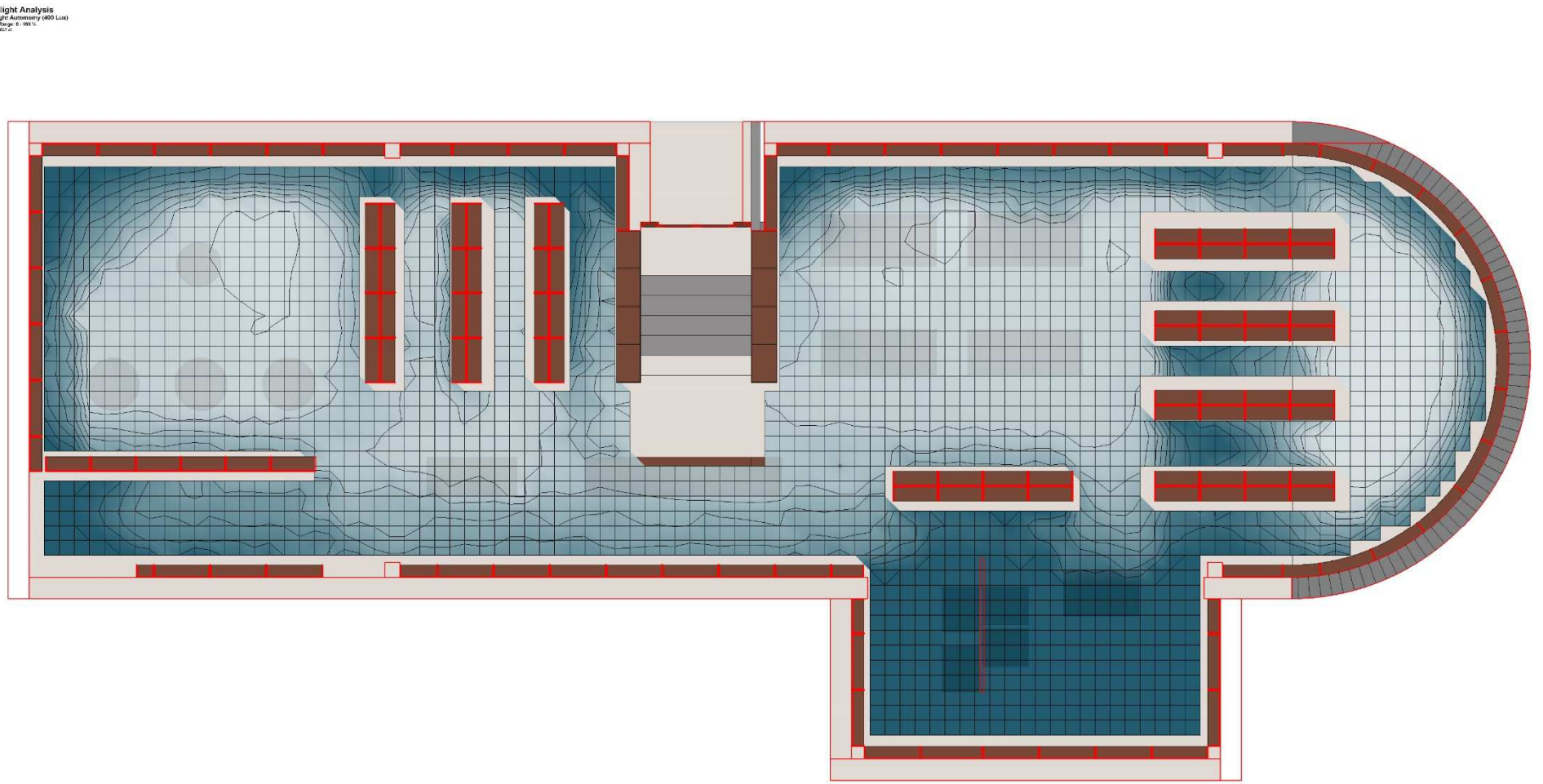
% OF TIME AT 400 LUX

100	90	80	70	60	50	40	30	20	10	0

A02

DAYLIGHT AUTONOMY FOR PROPOSED CONDITIONS

TARGET:400 LUX 10:00 AM – 08:00 PM | MONDAY THROUGH SUNDAY | ALL YEAR



% OF TIME AT 400 LUX

100	90	80	70	60	50	40	30	20	10	0

B. ILLUMINANCE ANALYSIS:

Illuminance analysis assesses the light levels on working planes, as defined in the Analysis Methodology, chapter V. For this study, the analysis was completed for the entire library's main floor. Also, to obtain a more granular spatial assessment, analysis was completed separately for the most used areas of the library - the adult reading area and the children reading area.
To encompass a wide range of various daylighting conditions, the study simulated light levels for the following dates and sky conditions:

- Best-case Illuminance - June 21st (highest sun angle), and clear sky for the times 9am, 12pm, and 3pm.
- Intermediate-case Illuminance - September 21st (mid sun angle, which is also similar to March 21st), partly cloudy sky for the times 9am, 12pm, 3pm.
- Worst-case Illuminance - overcast sky, where all days and times are the same since there is no sun.

The following tables and graphs present the results of the illuminance (light levels) calculations for the selected various conditions and locations within the library:

TABLE **2**: AVERAGE ILLUMINANCE (LIGHT LEVELS) VALUES FOR THE **ENTIRE LIBRARY MAIN FLOOR** (LUX).

SKY	OVERCAST SKY	PARTLY CLOUDY SKY			CLEAR SKY		
DAY	*ALL DAYS OF YEAR*	*SEPTEMBER 21ST*			*JUNE 21ST*		
TIME	ALL TIMES OF DAY	9:00 AM	12:00 PM	03:00 PM	9:00 AM	12:00 PM	03:00 PM
EXISTING AVG LUX	110.12	186.88	191.62	116.27	828.52	500.69	374.11
PROPOSED AVG LUX	105.75	177.42	144.94	111.63	812.93	478.36	377.57
% DIFFERENCE	-4.0%	-5.1%	-24.4%	-4.0%	-1.9%	-4.5%	0.9%
DAILY AVERAGE	**-4.0%**	**-11.1%**			**-1.8%**		

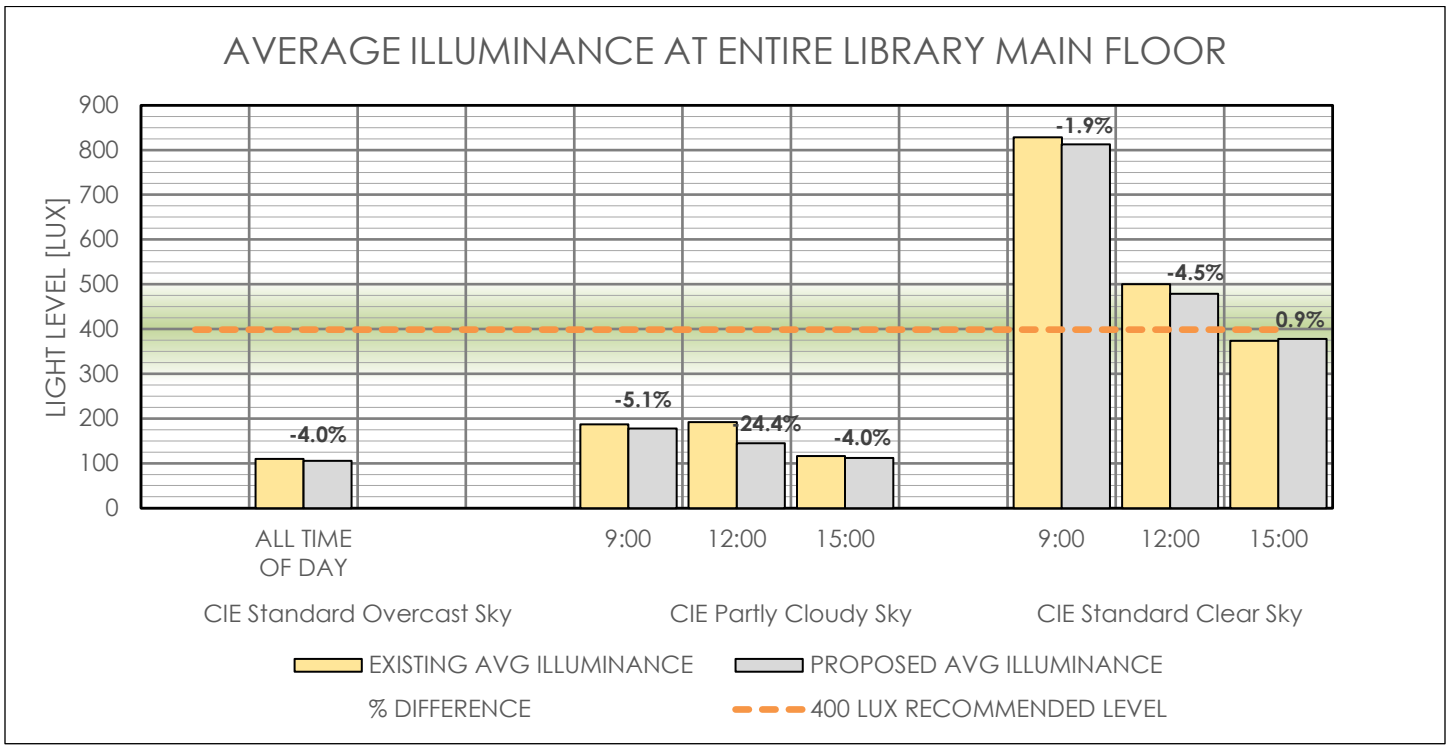


FIGURE **7**: GRAPH OF AVERAGE ILLUMINANCE VALUES FOR THE **ENTIRE LIBRARY MAIN FLOOR.**

The average illumination results show that in the best-case scenario the proposed condition of the library's light is reduced by 1.8%, the intermediate scenario reduction is -11.1% and the worst-case scenario reduction is -4%. **Of importance to note, as indicated by the orange line at 400 LUX, for both the intermediate-case (partly cloudy) and the worst-case (overcast) , the existing and the proposed conditions will require supplemental electric lights to meet the necessary LUX requirement for libraries.**

TABLE **3**: AVERAGE ILLUMINANCE (LIGHT LEVELS) VALUES FOR THE **ADULTS READING AREA** (LUX).

SKY	OVERCAST SKY	PARTLY CLOUDY SKY			CLEAR SKY		
DAY	*ALL DAYS OF YEAR*	*SEPTEMBER 21ST*			*JUNE 21ST*		
TIME	ALL TIMES OF DAY	9:00 AM	12:00 PM	03:00 PM	9:00 AM	12:00 PM	03:00 PM
EXISTING AVG LUX	155.87	148.35	151.01	164.66	532.84	691.07	557.99
PROPOSED AVG LUX	148.08	142.86	129.63	154.6	504.86	635.95	555.46
% DIFFERENCE	-5.0%	-3.7%	-14.2%	-6.1%	-5.3%	-8.0%	-0.5%
DAILY AVERAGE	**-5.0%**	**-8.0%**			**-4.6%**		

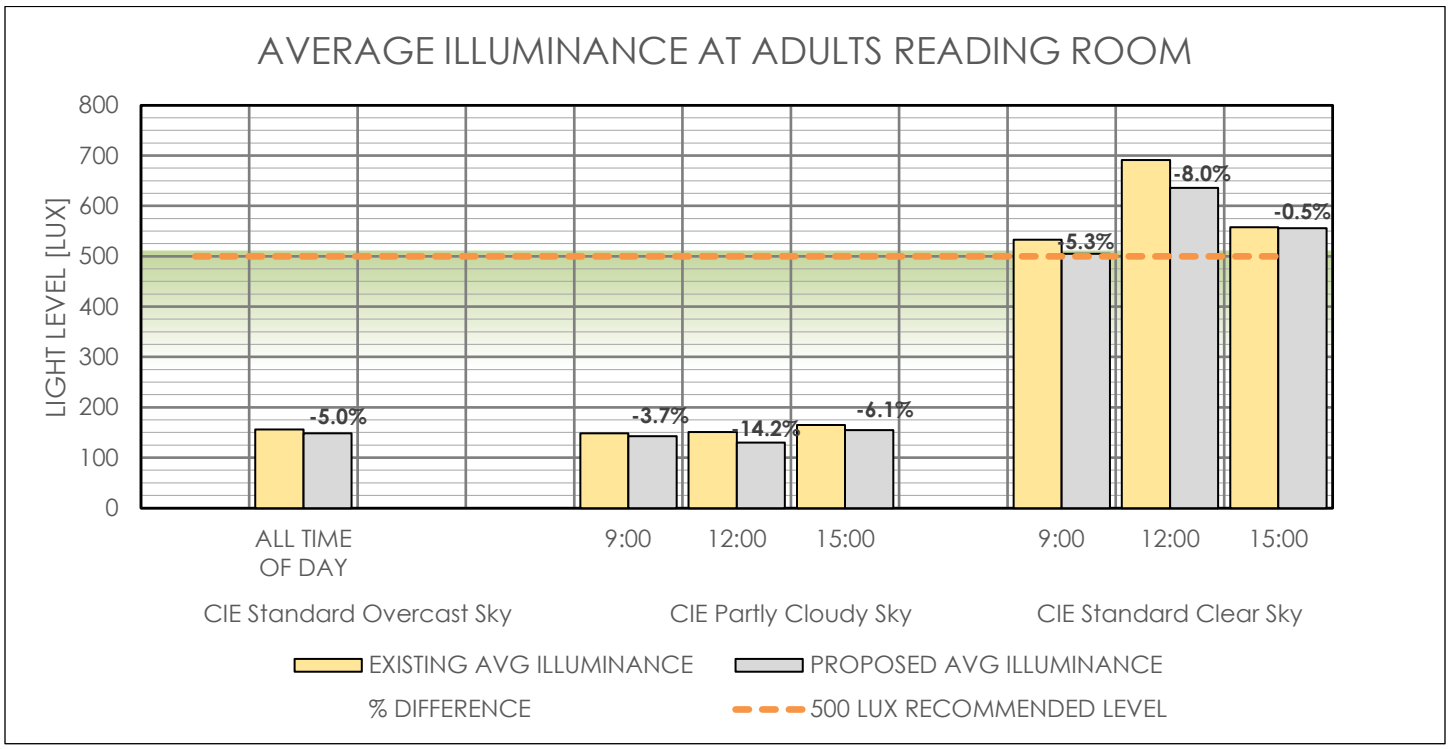


FIGURE **8**: GRAPH OF AVERAGE ILLUMINANCE VALUES FOR THE **ADULTS READING ROOM**.

TABLE **4**: AVERAGE ILLUMINANCE (LIGHT LEVELS) VALUES FOR THE **CHILDREN READING AREA** (LUX).

SKY	OVERCAST SKY	PARTLY CLOUDY SKY			CLEAR SKY		
DAY	*ALL DAYS OF YEAR*	*SEPTEMBER 21ST*			*JUNE 21ST*		
TIME	ALL TIMES OF DAY	9:00 AM	12:00 PM	03:00 PM	9:00 AM	12:00 PM	03:00 PM
EXISTING AVG LUX	128.06	165.49	149.74	131.55	482.92	489.05	393.62
PROPOSED AVG LUX	126.3	146.72	142.29	130.76	468.41	493.6	389.22
% DIFFERENCE	-1.4%	-11.3%	-5.0%	-0.6%	-3.0%	0.9%	-1.1%
DAILY AVERAGE	**-1.4%**	**-5.6%**			**-1.1%**		

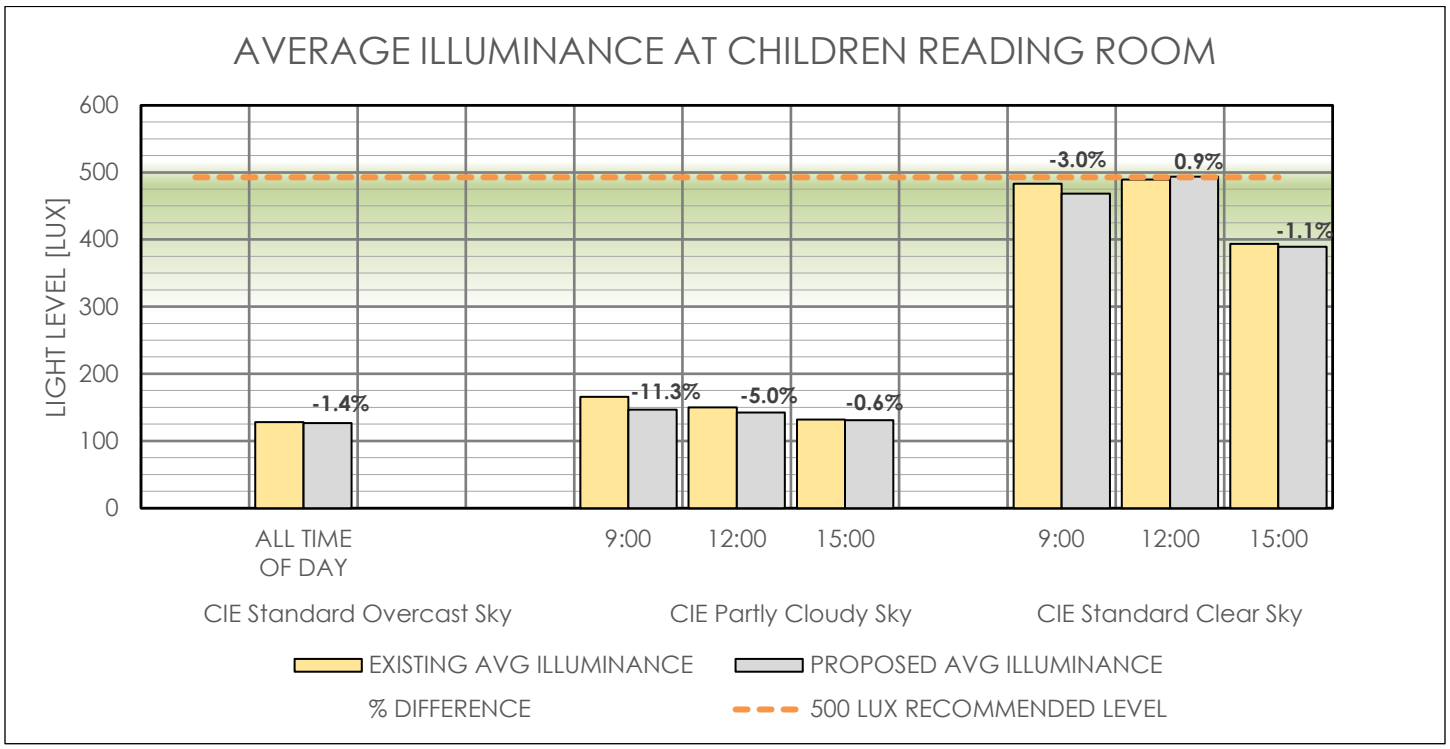


FIGURE **9**: GRAPH OF AVERAGE ILLUMINANCE VALUES FOR THE **CHILDREN READING ROOM**.

Here again, we see the average minimal decreases in light levels:

Adult Reading Area: overcast -5%, partly cloudy -8%, and clear sky -4.6%

Children's Reading area: overcast -1.4%, partly cloudy -5.6% and clear sky -1.1%

For overcast and partly cloudy sky conditions, the average existing light levels within the library reading areas are well below the 500 LUX light levels recommended by the IES for library small print reading areas, therefore supplemental lighting (electrical) is necessary, for BOTH the existing and proposed conditions. As such, the reduction of natural light levels from the proposed condition is irrelevant.

For clear sky conditions in the adult reading area, the proposed light levels fall at or above the IES recommended 500 LUX, so **the small reduction in light would not impact the patrons' visual acuity within the library reading rooms.**

For the clear sky condition in the children's reading area, notice that there was a slight increase in light levels at 12 noon. This is most likely due to the proposed project addition reflecting additional light into the library.

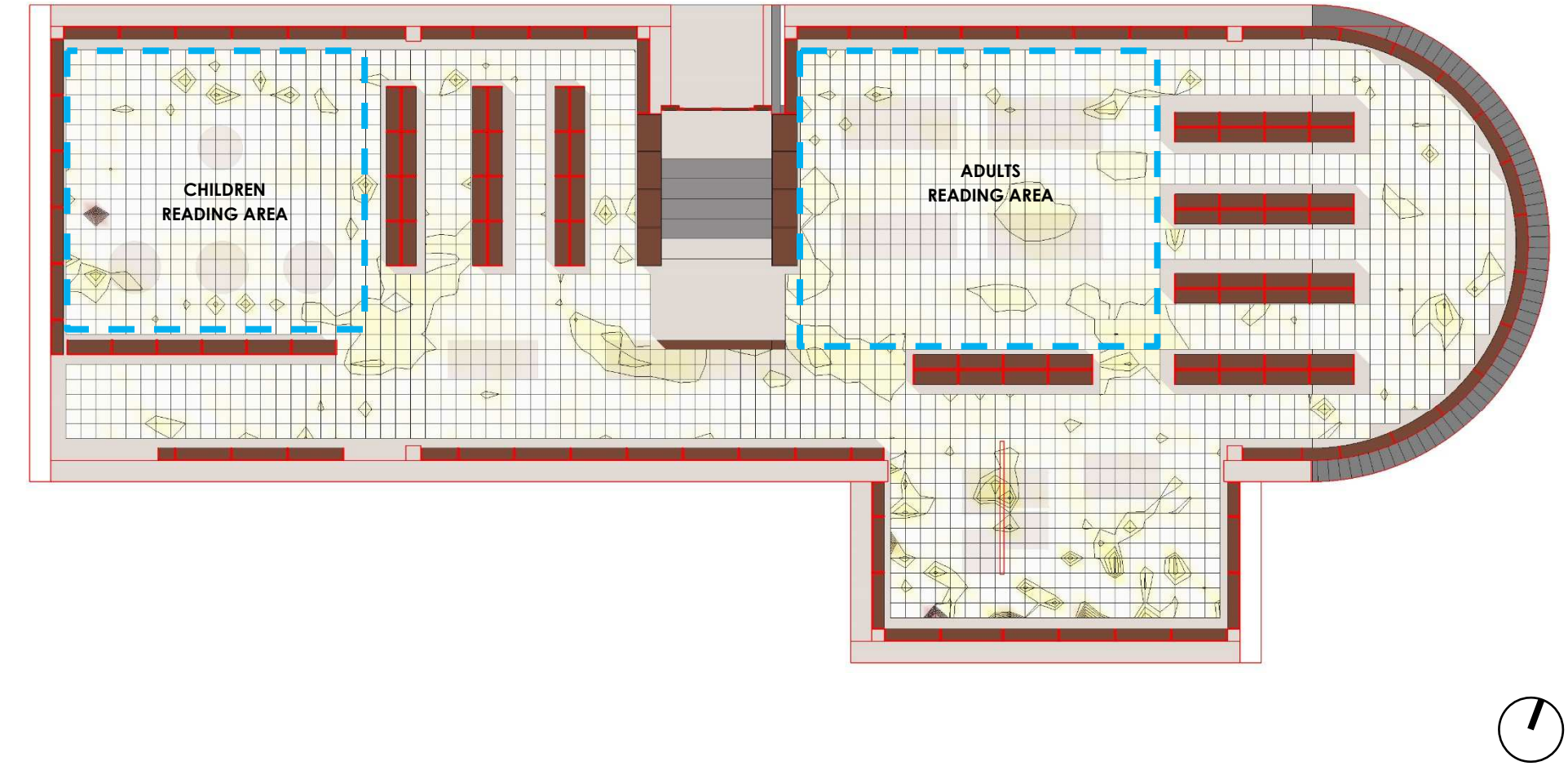
The following diagrams show the **percent difference** in lighting at every light sensor point in the library.

B03

LIGHT LEVELS PERCENTAGE DIFFERENCE [%]

ALL YEAR

OVERCAST SKY – ALL TIMES



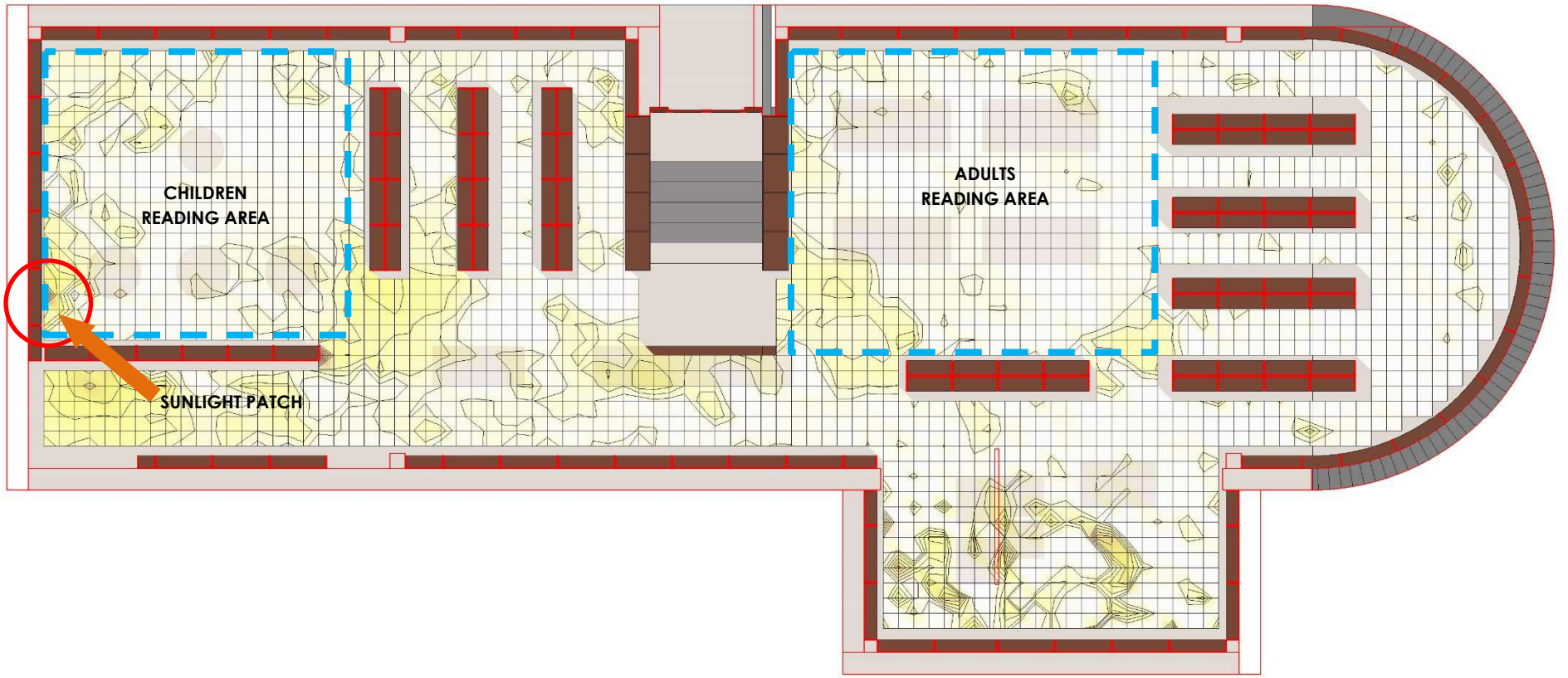
% DIFFERENCE

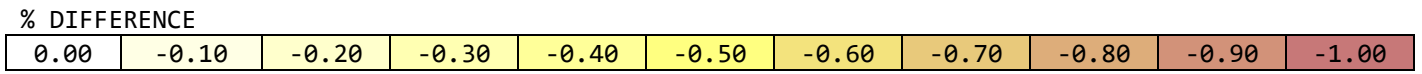
0.00	-0.10	-0.20	-0.30	-0.40	-0.50	-0.60	-0.70	-0.80	-0.90	-1.00

C03

LIGHT LEVELS PERCENTAGE DIFFERENCE [%]

SEPTEMBER 21ST PARTLY CLOUDY SKY – 09:00 AM

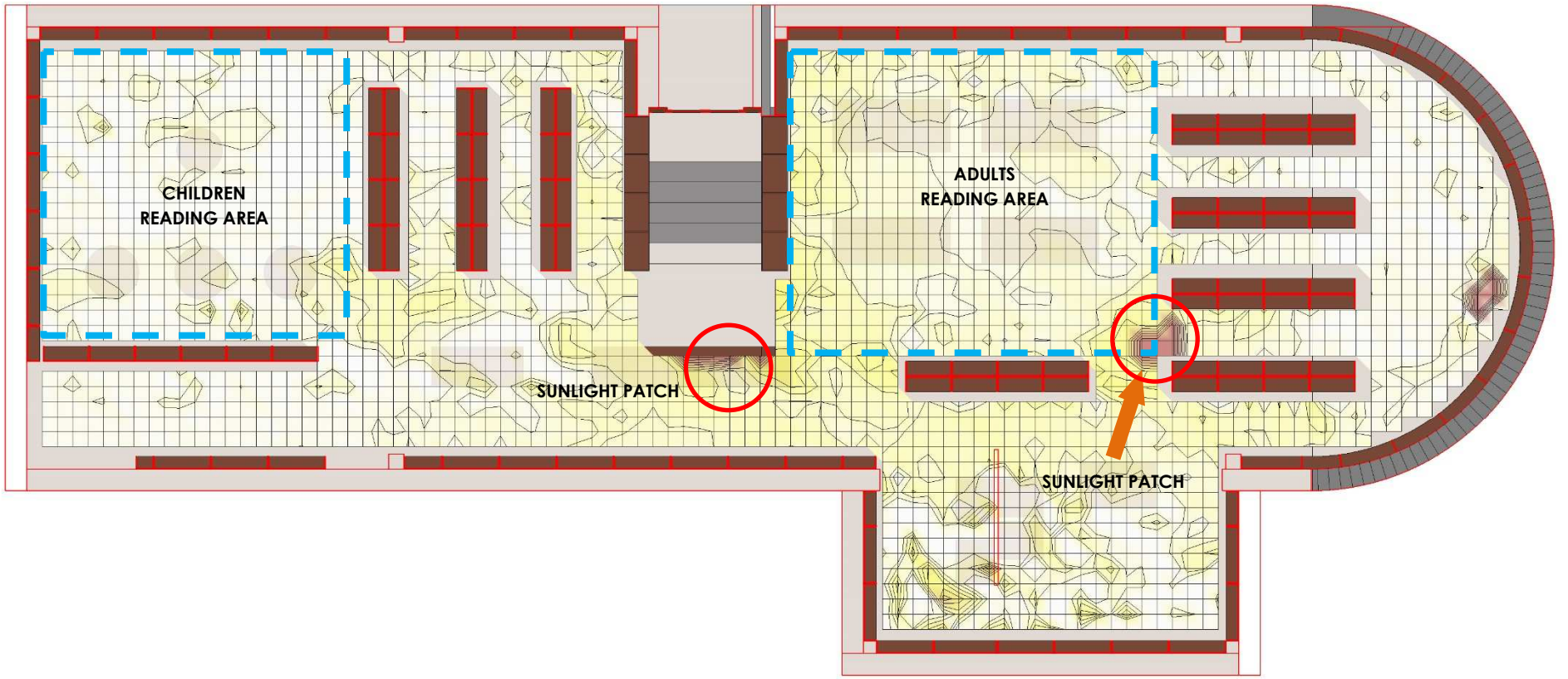




C06

LIGHT LEVELS PERCENTAGE DIFFERENCE [%]

SEPTEMBER 21ST PARTLY CLOUDY SKY – 12:00 PM



% DIFFERENCE

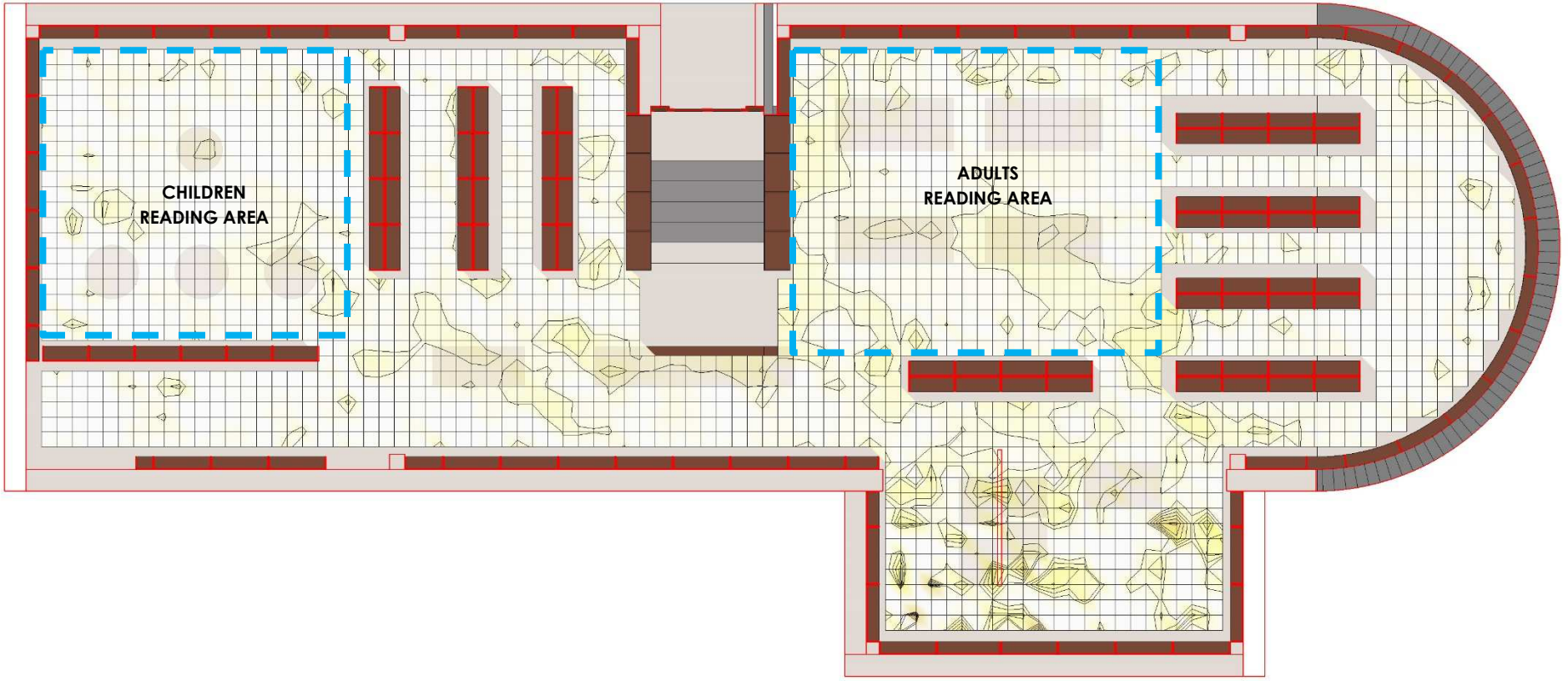
0.00	-0.10	-0.20	-0.30	-0.40	-0.50	-0.60	-0.70	-0.80	-0.90	-1.00

C09

LIGHT LEVELS PERCENTAGE DIFFERENCE [%]

SEPTEMBER 21ST PARTLY CLOUDY SKY – 03:00 PM

Analysis Grid
RAD Illuminance [lx]



% DIFFERENCE

0.00	-0.10	-0.20	-0.30	-0.40	-0.50	-0.60	-0.70	-0.80	-0.90	-1.00

D03

LIGHT LEVELS PERCENTAGE DIFFERENCE [%]

JUNE 21ST

CLEAR SKY – 09:00 AM

Analysis Grid
RAD Illuminance [lx]

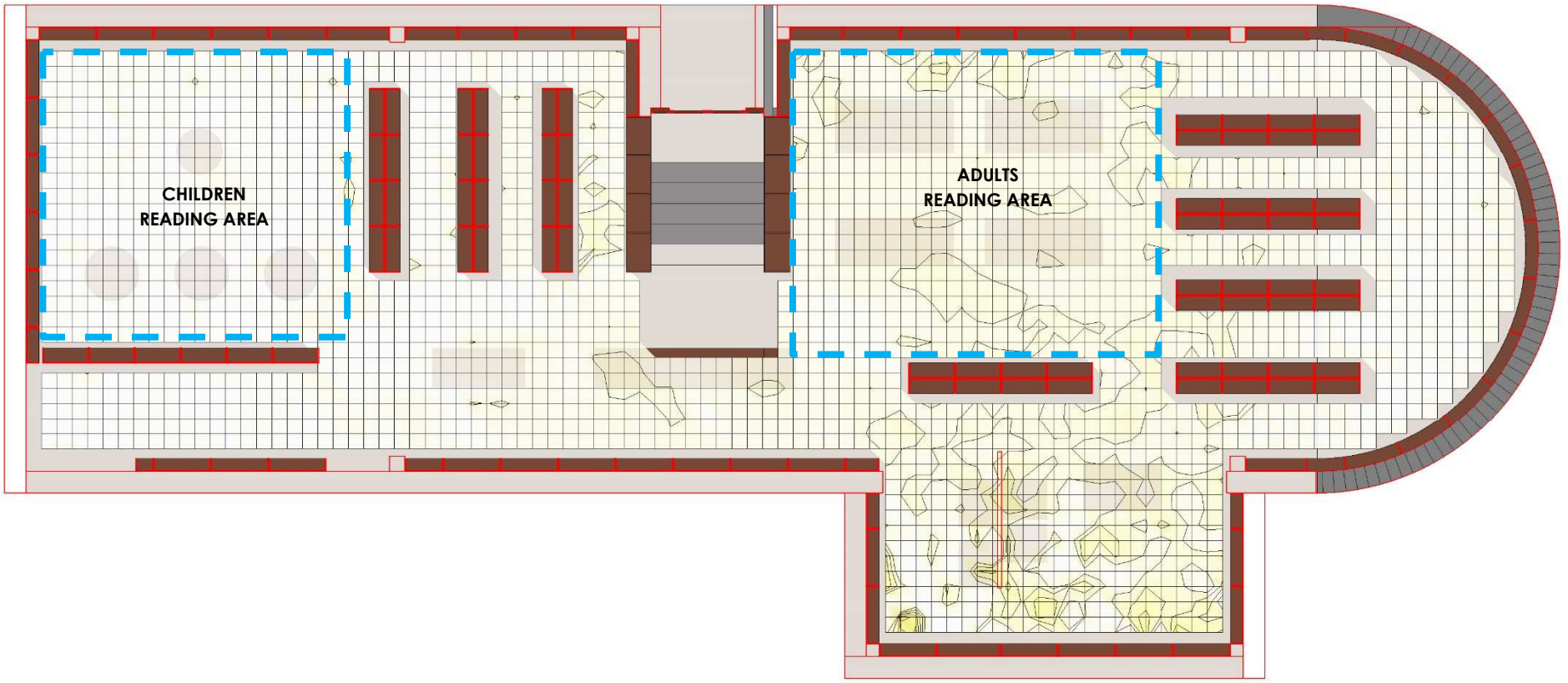
% DIFFERENCE										
0.00	-0.10	-0.20	-0.30	-0.40	-0.50	-0.60	-0.70	-0.80	-0.90	-1.00

D06

LIGHT LEVELS PERCENTAGE DIFFERENCE [%]

JUNE 21ST

CLEAR SKY – 12:00 PM



% DIFFERENCE

0.00	-0.10	-0.20	-0.30	-0.40	-0.50	-0.60	-0.70	-0.80	-0.90	-1.00

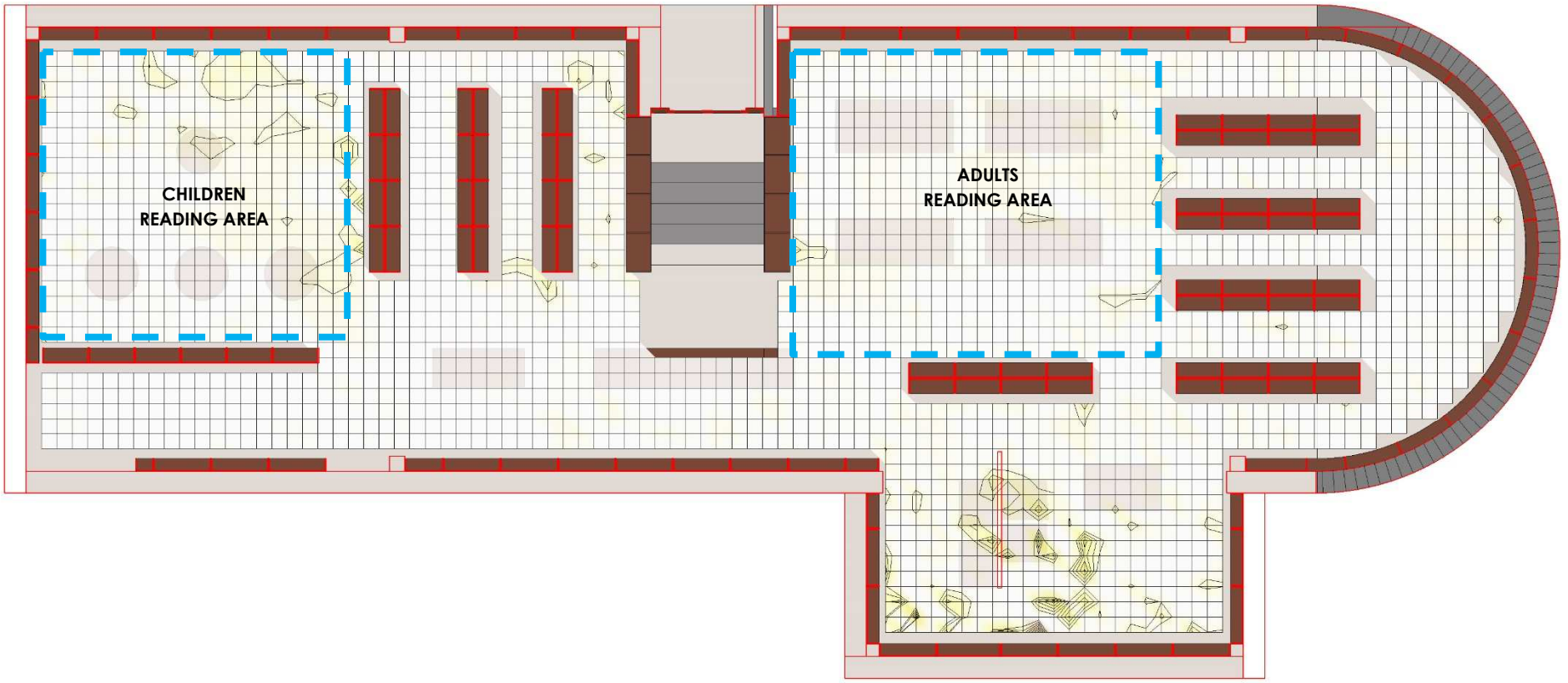
D09

LIGHT LEVELS PERCENTAGE DIFFERENCE [%]

JUNE 21ST

CLEAR SKY – 03:00 PM

Analysis Grid
RAD Illuminance [lx]



% DIFFERENCE

0.00	-0.10	-0.20	-0.30	-0.40	-0.50	-0.60	-0.70	-0.80	-0.90	-1.00

The next diagrams are in LUX units of illuminance and show the light levels at every point in the library. By placing side by side the existing and proposed diagrams for each light / time scenario, one can easily compare the variant light conditions in the library. Looking at the PDF report on the computer, it is easy to flip between two diagrams, with the same sky / day / time, one existing and one proposed, to visually see the light differences. **When evaluating these diagrams, it is important to be aware of the IES light level threshold for libraries (300 for stacks, circulation desk, computer areas, 400 average of all areas, 500 for reading areas).**

An additional analysis was done for a partly cloudy sky at 12:00 pm under proposed conditions without the book stacks to evaluate their effect on the overall daylight levels within the library's main floor. The result shows that the book stacks can reduce the overall light levels by up to 36.7%.

For any colored area that is below 300, supplemental light is needed in all areas. For the children's and adult's reading areas - the yellow LUX level of 500+ means that NO electrical lights are needed, any other color in those reading areas would suggest that supplemental lighting is necessary.

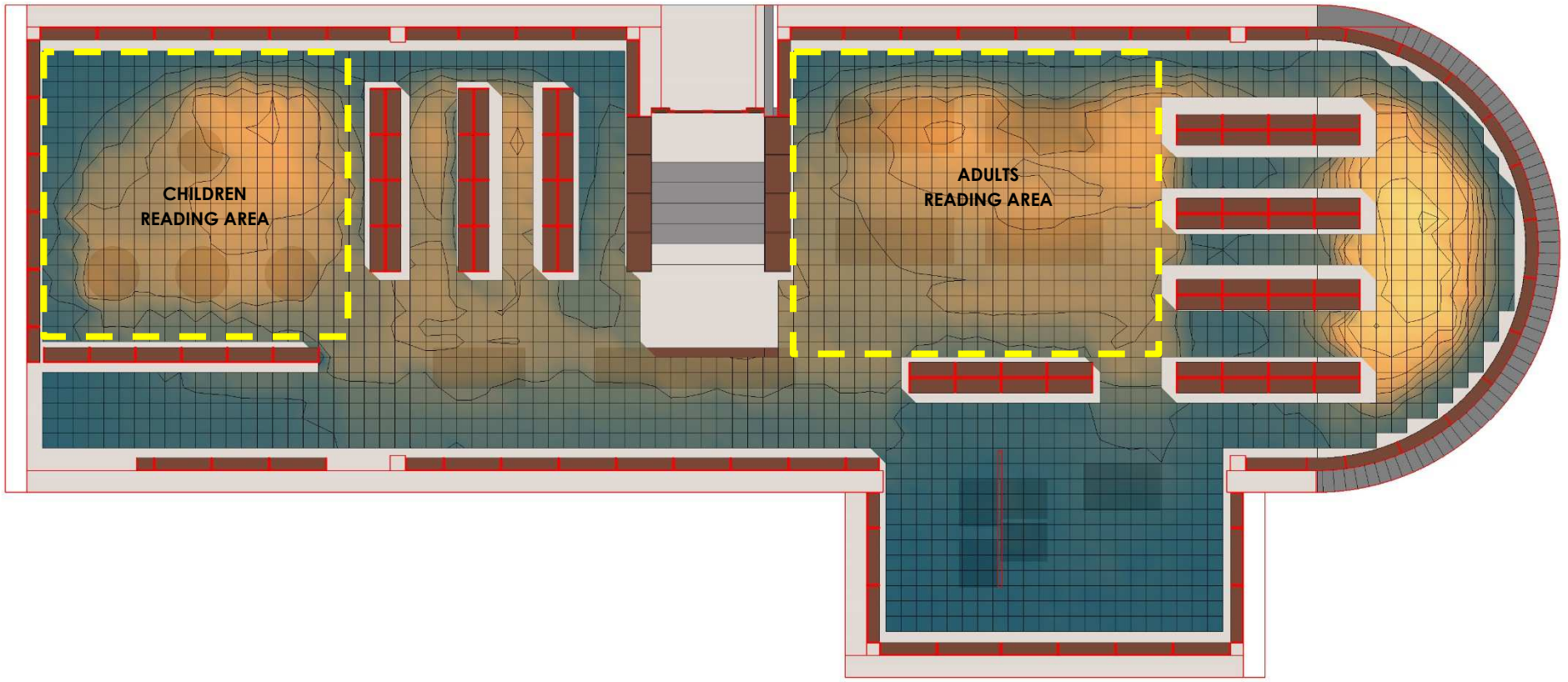
B01

LIGHT LEVELS [LUX] FOR EXISTING CONDITIONS

ALL YEAR

OVERCAST SKY – ALL TIMES

Analysis Grid
RAD Illuminance



LUX

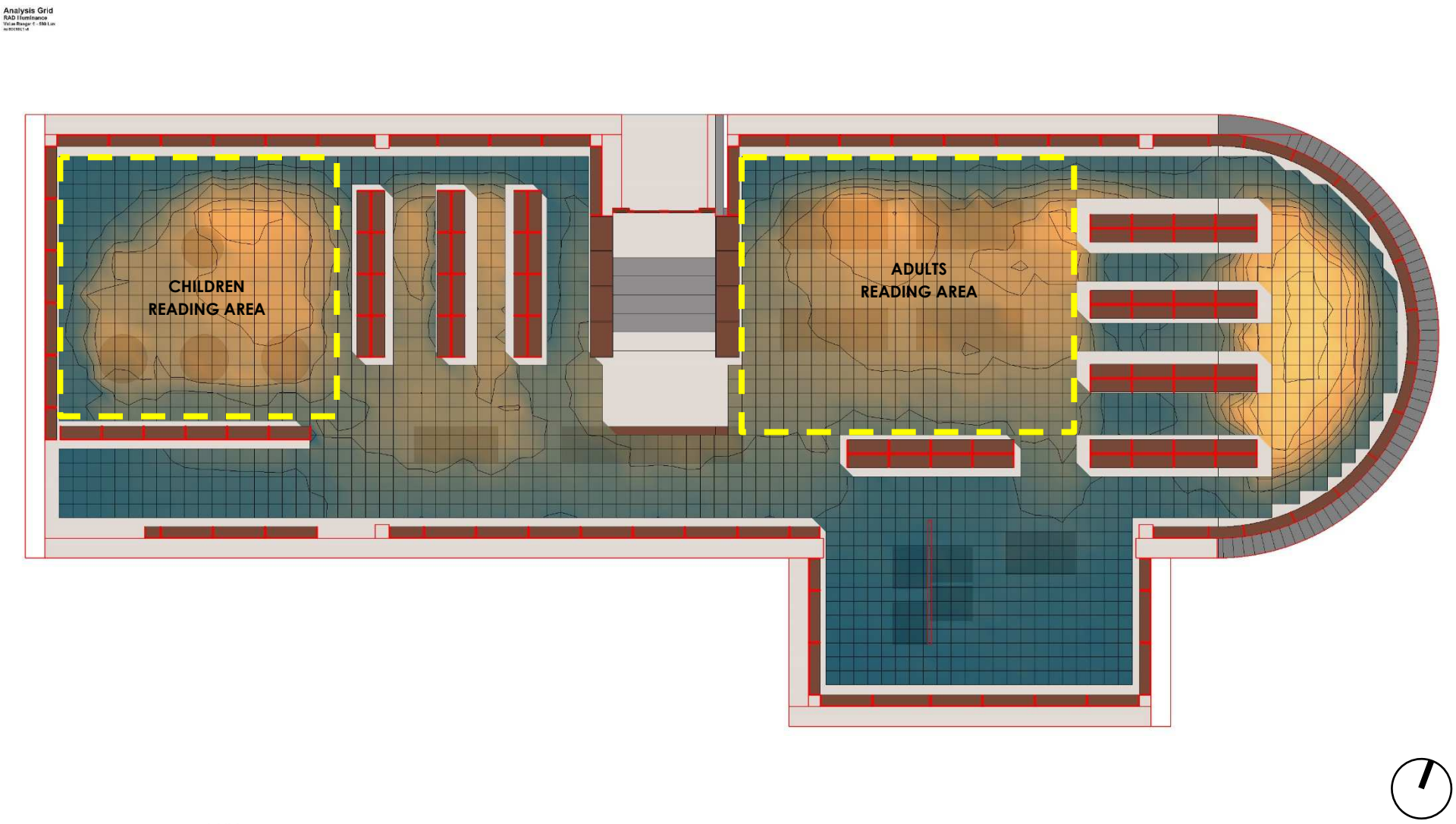
500	450	400	350	300	250	200	150	100	50	0

B02

LIGHT LEVELS [LUX] FOR PROPOSED CONDITIONS

ALL YEAR

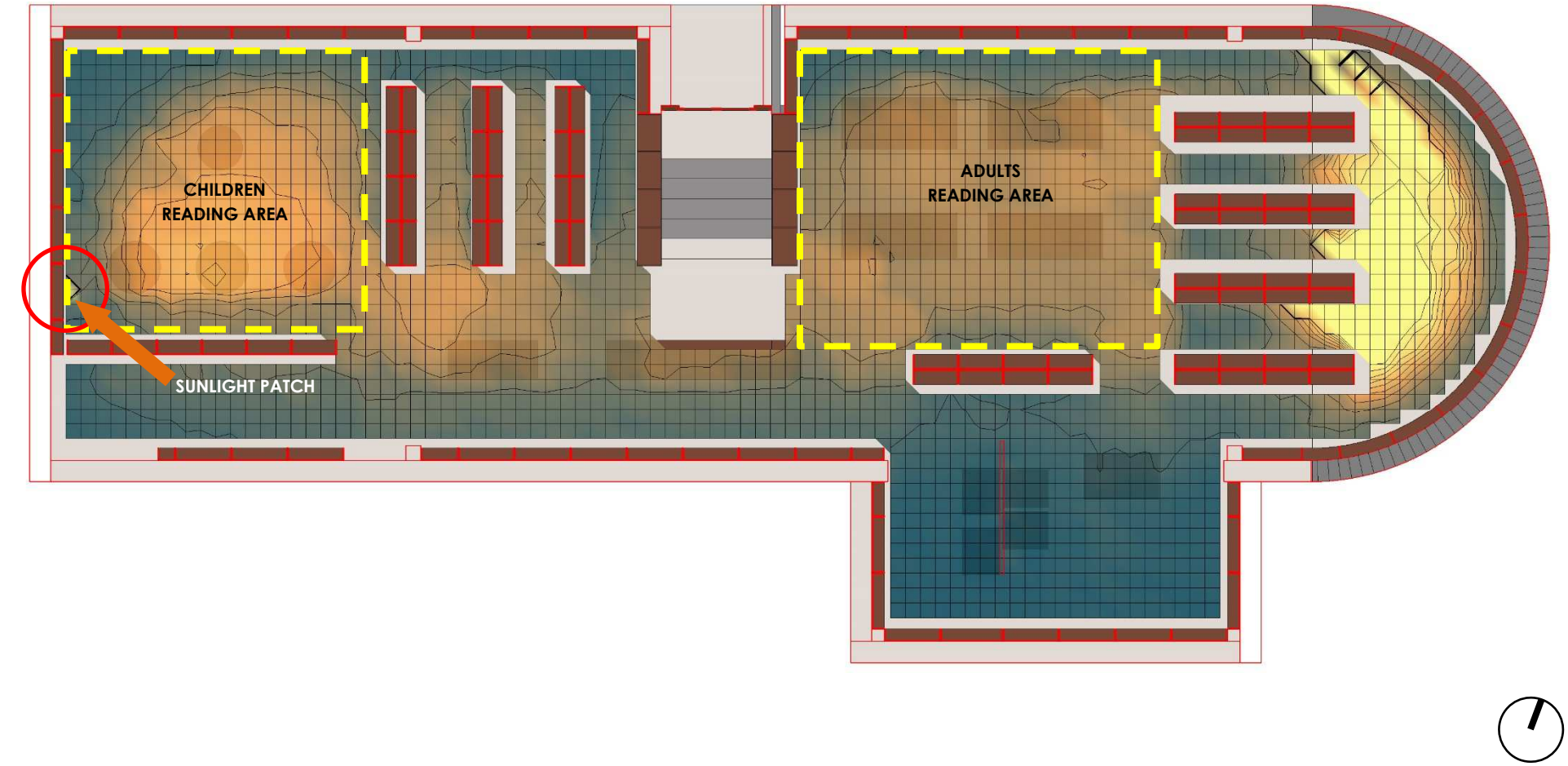
OVERCAST SKY – ALL TIMES



C01

LIGHT LEVELS [LUX] FOR EXISTING CONDITIONS

SEPTEMBER 21ST PARTLY CLOUDY SKY – 09:00 AM



LUX

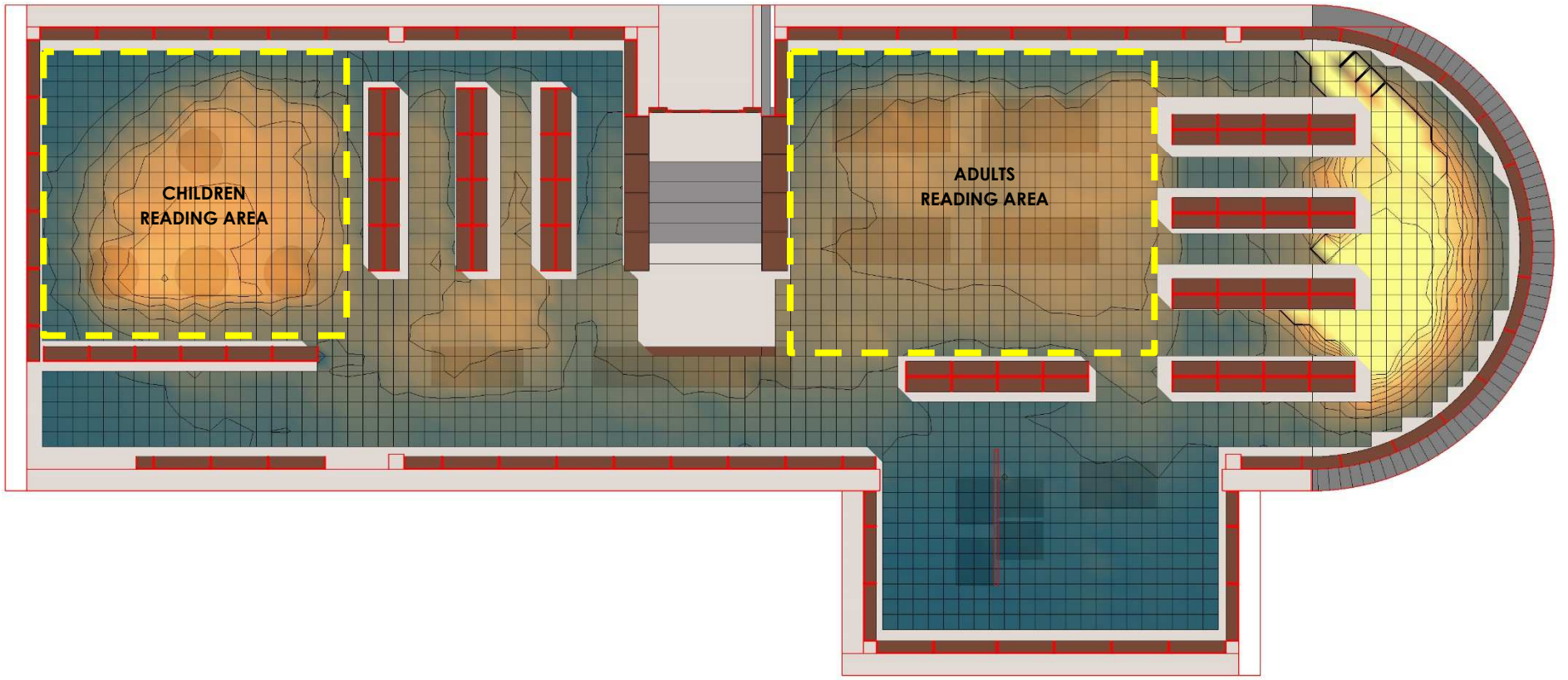
500	450	400	350	300	250	200	150	100	50	0

C02

LIGHT LEVELS [LUX] FOR PROPOSED CONDITIONS

SEPTEMBER 21ST PARTLY CLOUDY SKY – 09:00 AM

Analysis Grid
RAD Illuminance



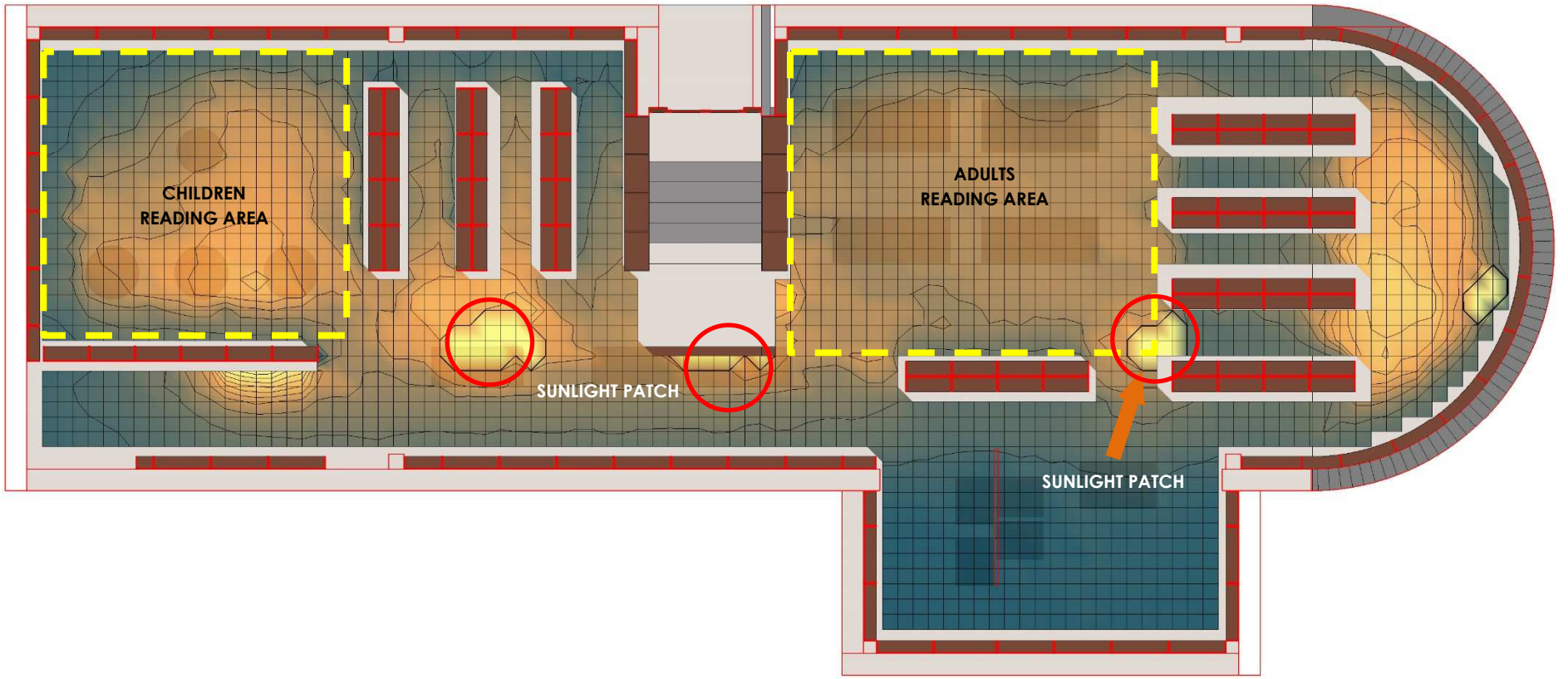
LUX

500	450	400	350	300	250	200	150	100	50	0

C04

LIGHT LEVELS [LUX] FOR EXISTING CONDITIONS

SEPTEMBER 21ST PARTLY CLOUDY SKY – 12:00 PM



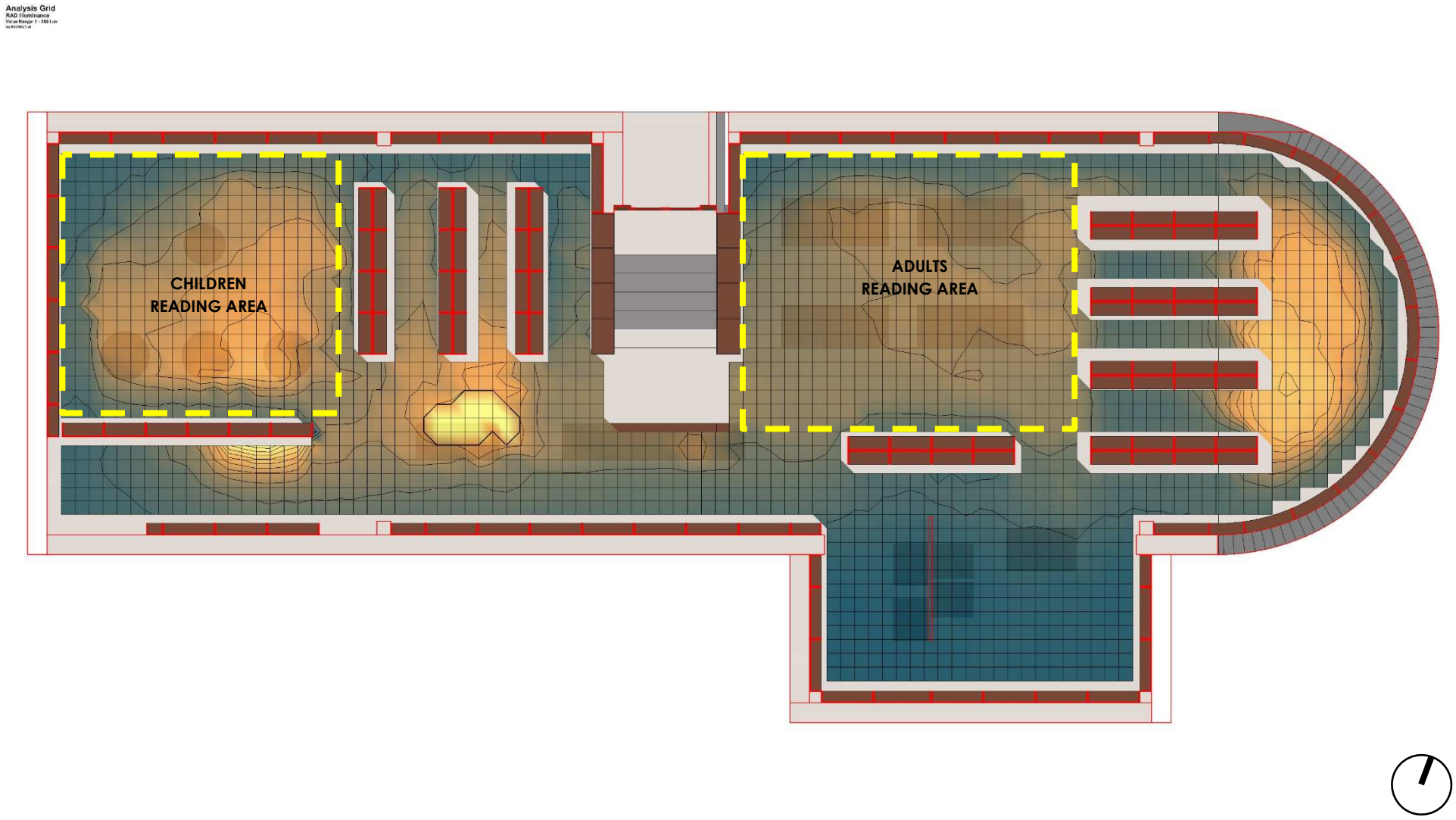
LUX

500	450	400	350	300	250	200	150	100	50	0

C05

LIGHT LEVELS [LUX] FOR PROPOSED CONDITIONS

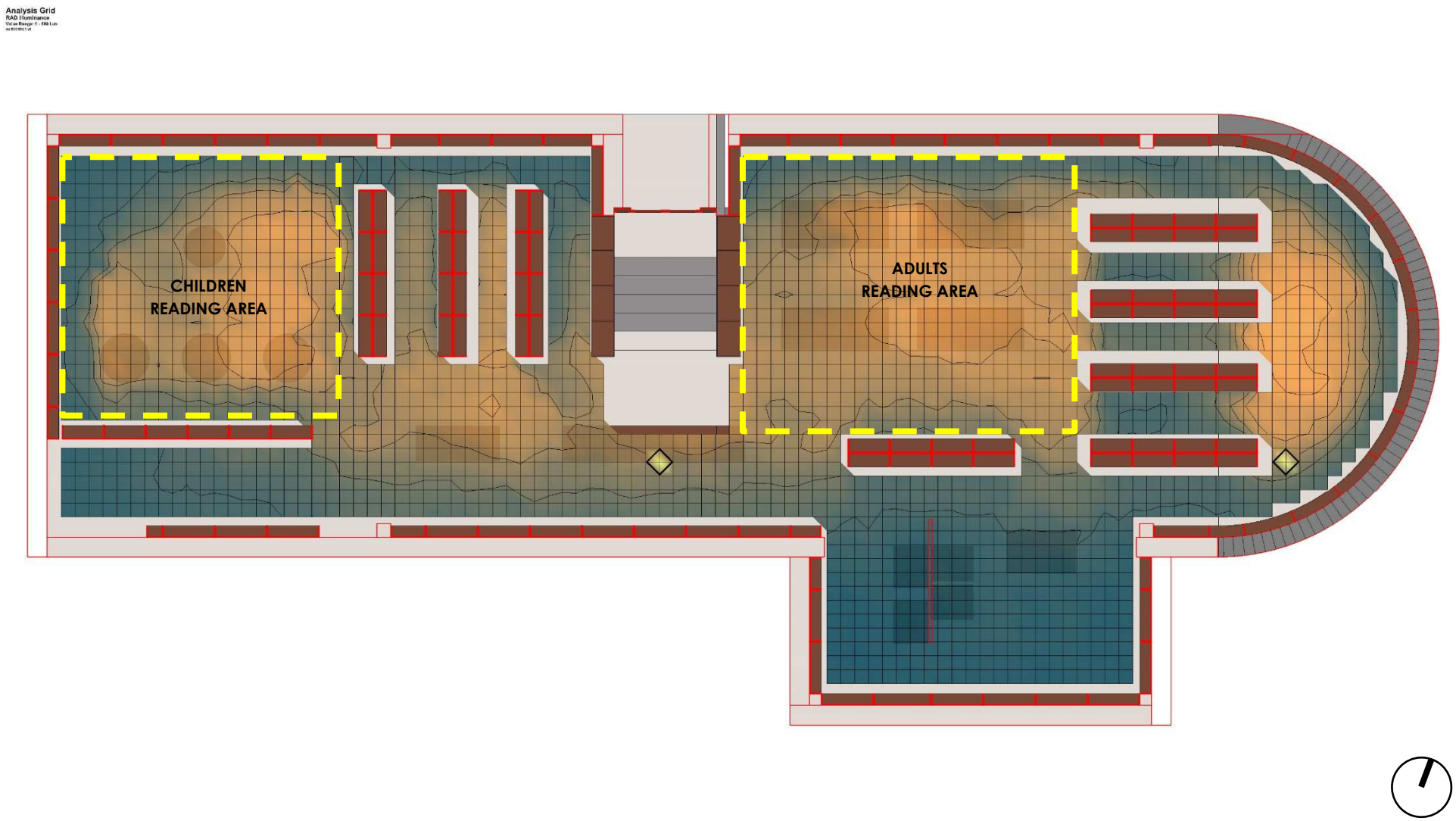
SEPTEMBER 21ST PARTLY CLOUDY SKY – 12:00 PM



C07

LIGHT LEVELS [LUX] FOR EXISTING CONDITIONS

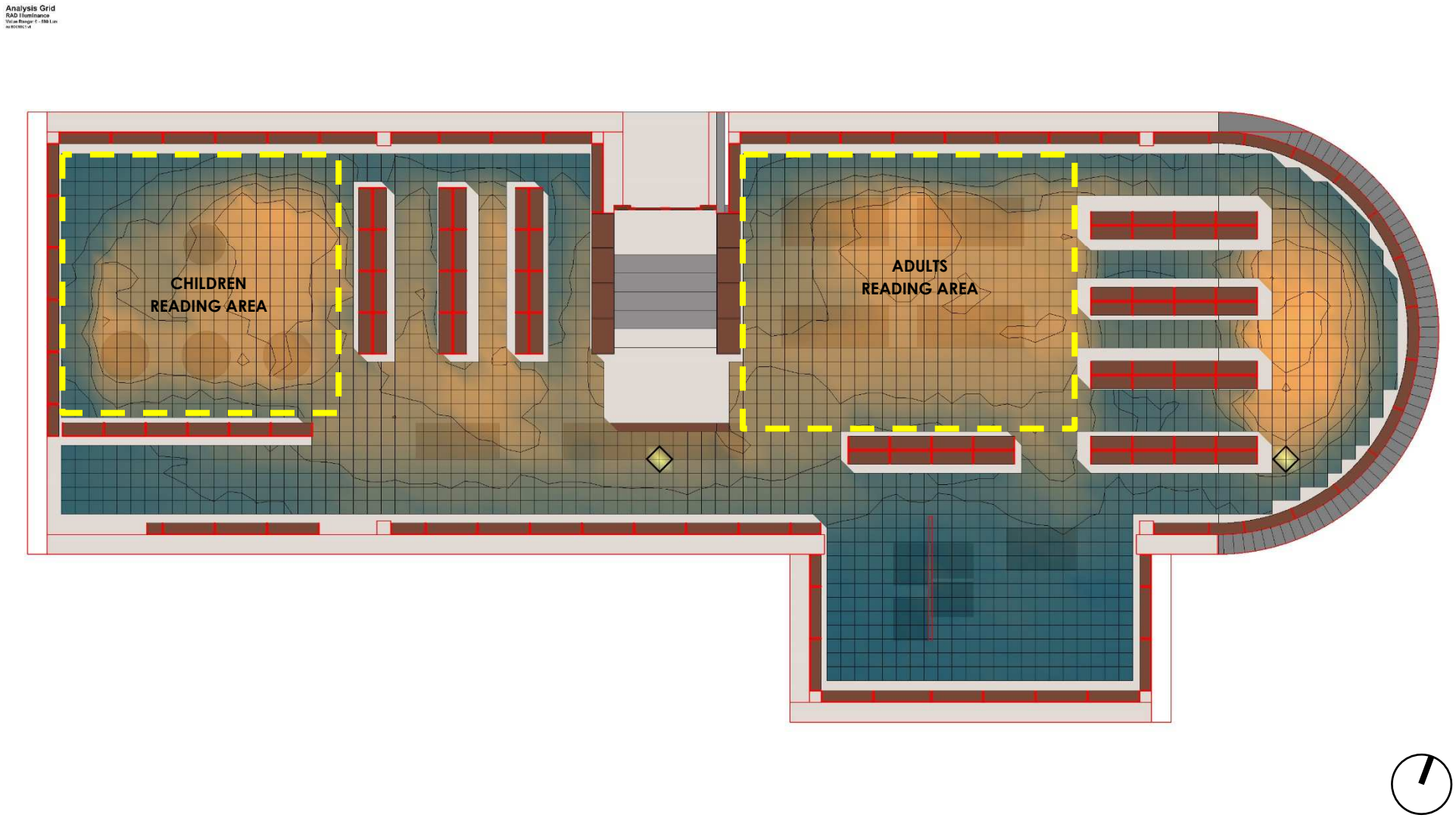
SEPTEMBER 21ST PARTLY CLOUDY SKY – 03:00 PM



C08

LIGHT LEVELS [LUX] FOR PROPOSED CONDITIONS

SEPTEMBER 21ST PARTLY CLOUDY SKY – 03:00 PM

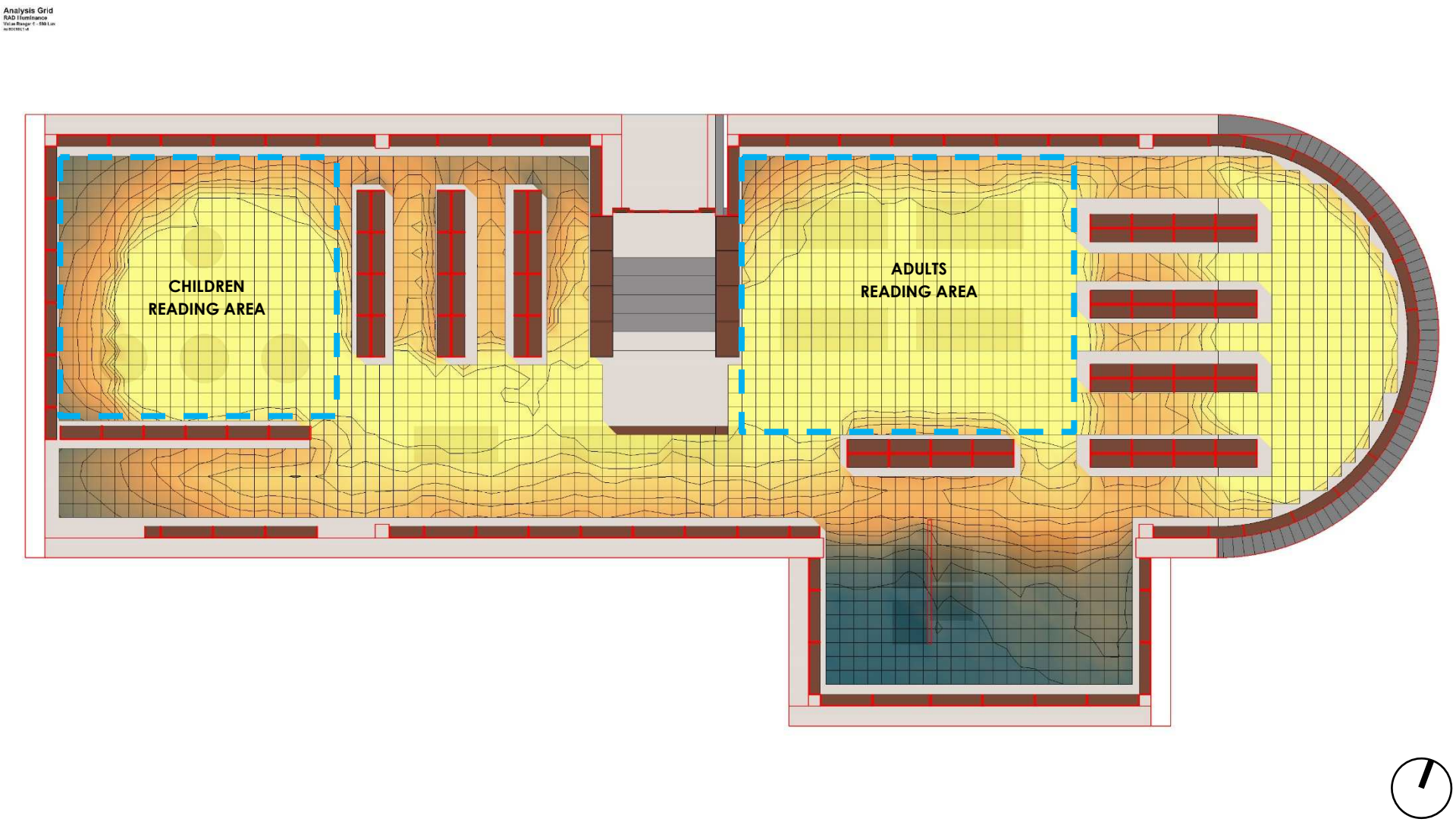


D01

LIGHT LEVELS [LUX] FOR EXISTING CONDITIONS

JUNE 21ST

CLEAR SKY – 09:00 AM



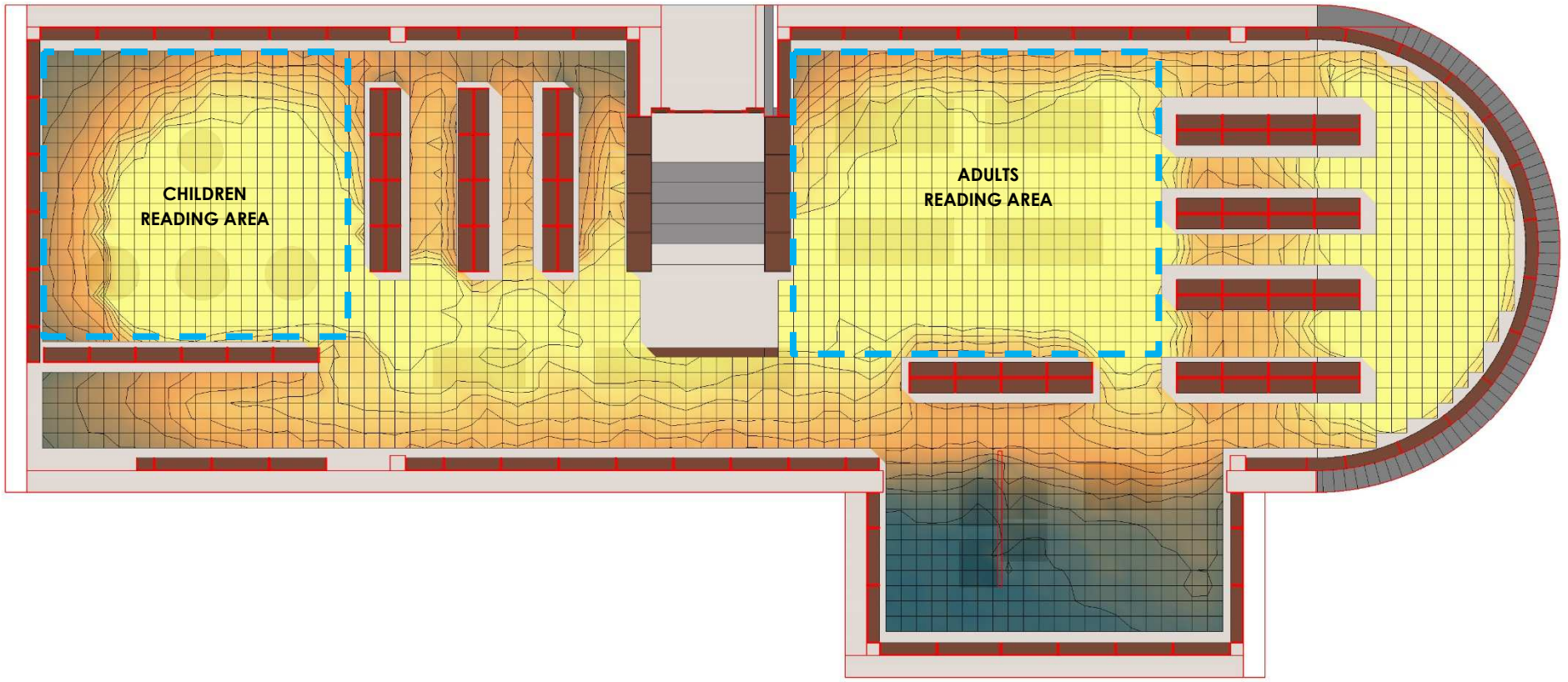
D02

LIGHT LEVELS [LUX] FOR PROPOSED CONDITIONS

JUNE 21ST

CLEAR SKY – 09:00 AM

Analysis Grid
RAD Illuminance



LUX

500	450	400	350	300	250	200	150	100	50	0

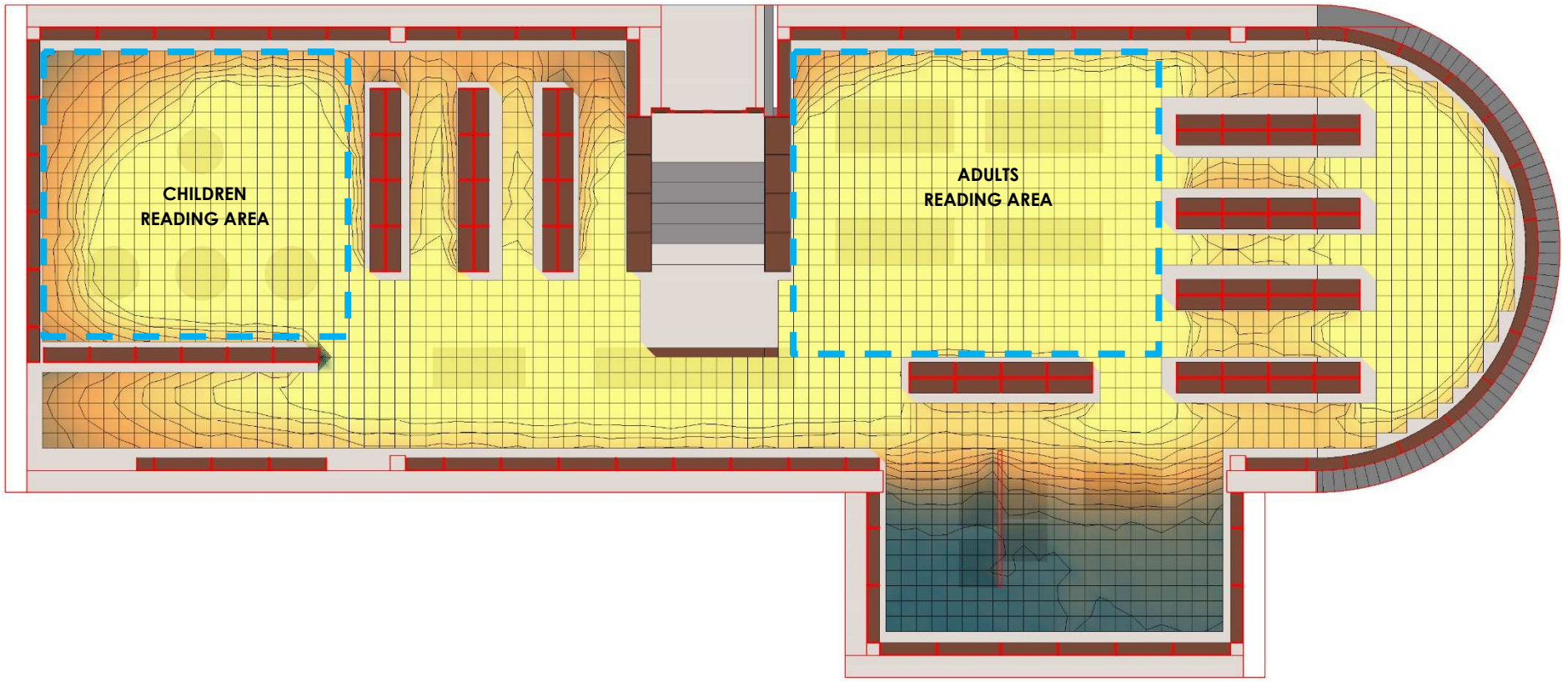
D04

LIGHT LEVELS [LUX] FOR EXISTING CONDITIONS

JUNE 21ST

CLEAR SKY – 12:00 PM

Analysis Grid
RAD Illuminance



LUX

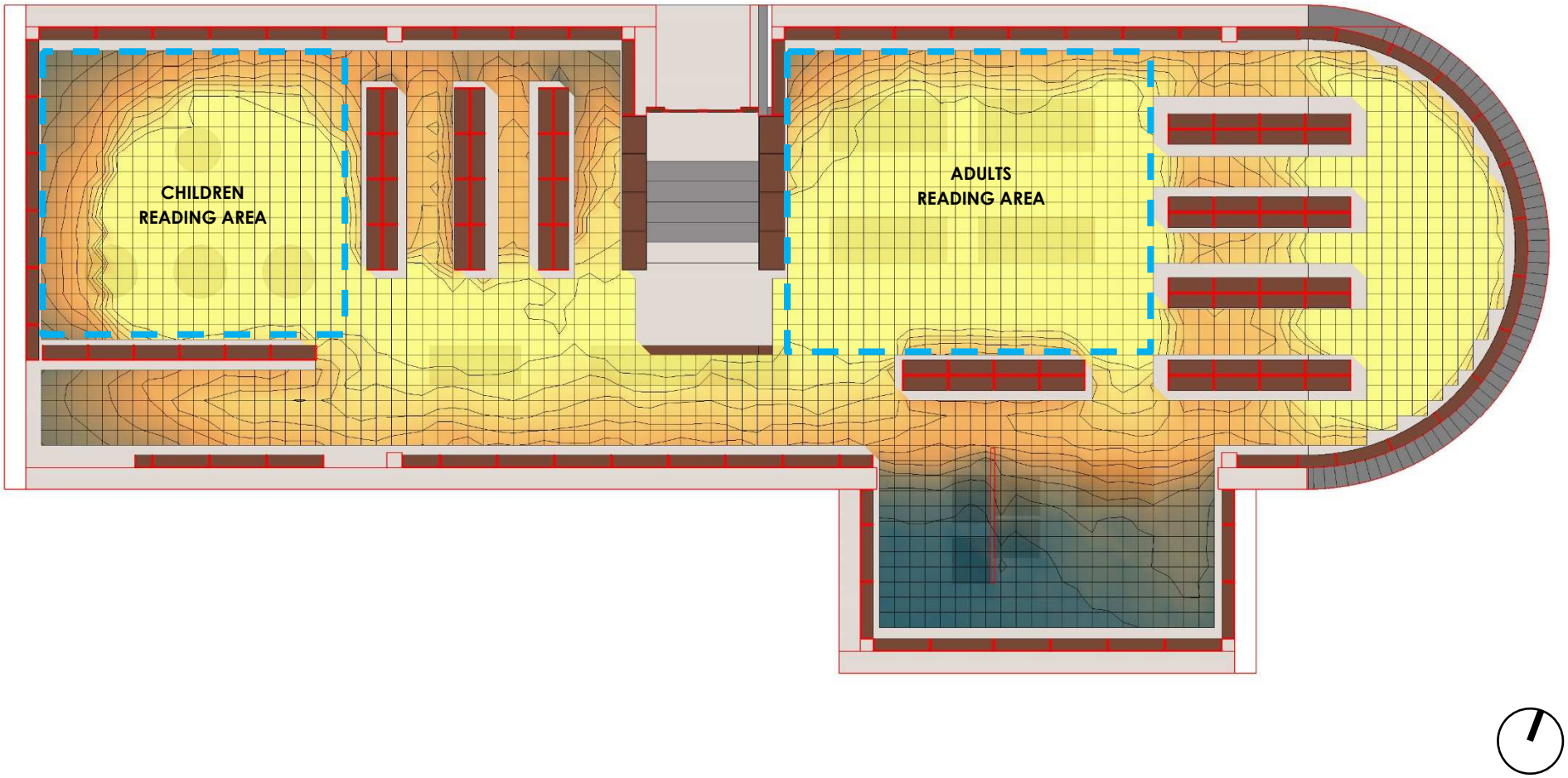
500	450	400	350	300	250	200	150	100	50	0

D05

LIGHT LEVELS [LUX] FOR PROPOSED CONDITIONS

JUNE 21ST

CLEAR SKY – 12:00 PM



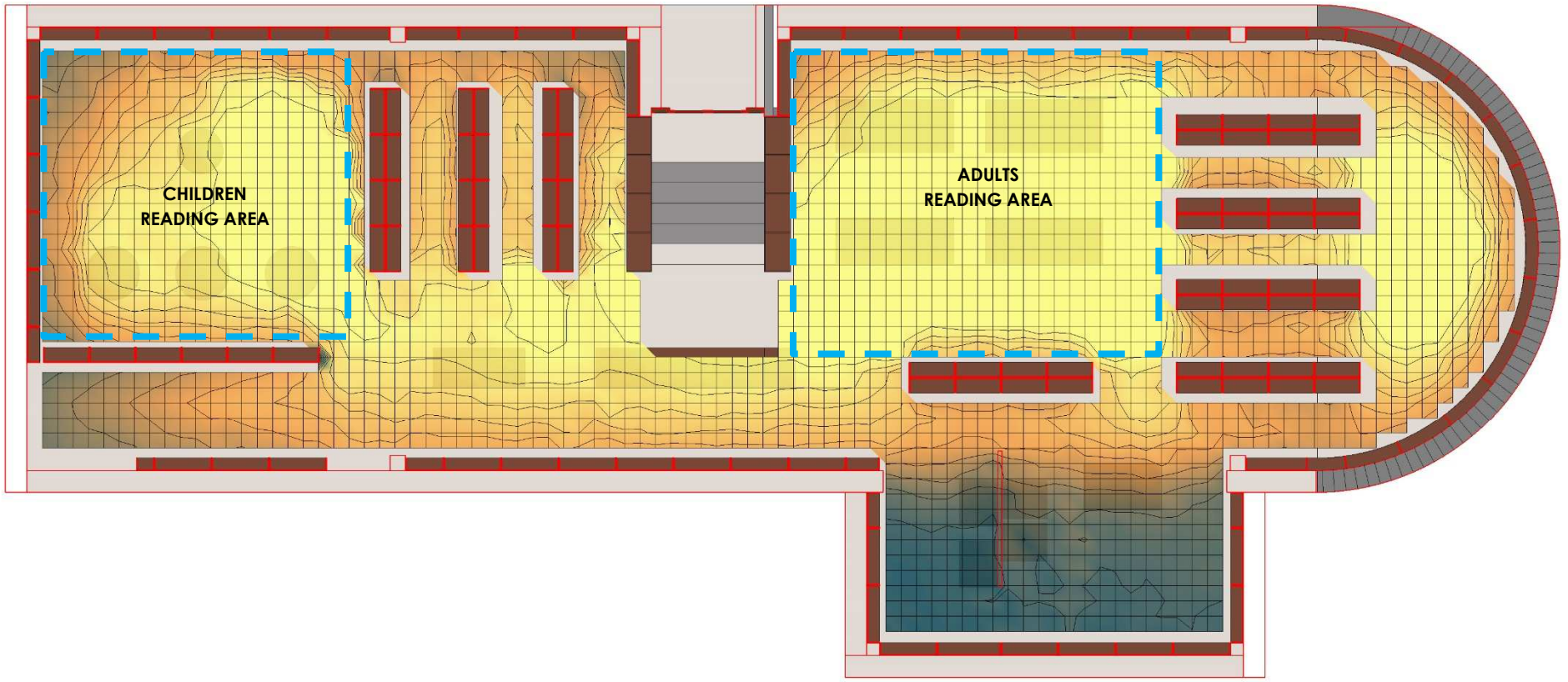
D07

LIGHT LEVELS [LUX] FOR EXISTING CONDITIONS

JUNE 21ST

CLEAR SKY – 03:00 PM

Analysis Grid
RAD Illuminance



LUX

500	450	400	350	300	250	200	150	100	50	0

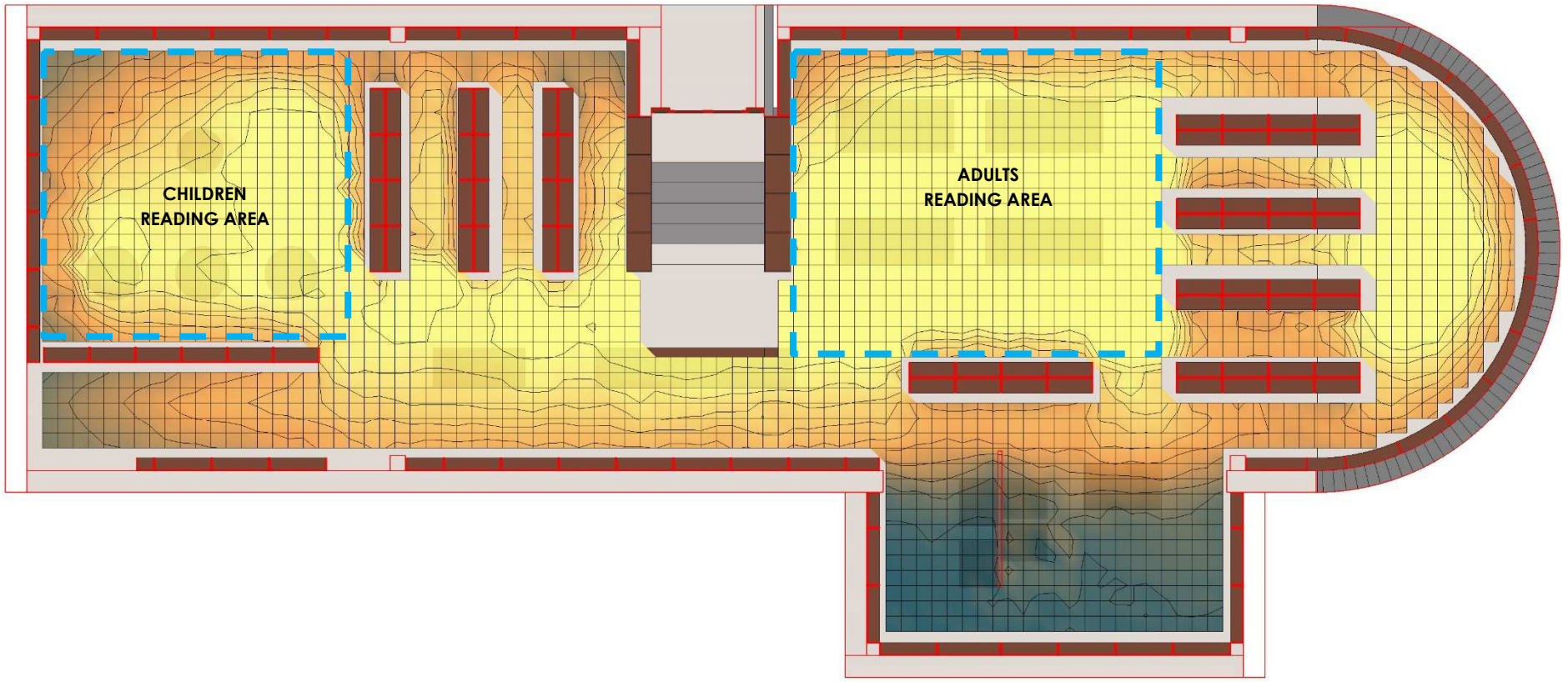
D08

LIGHT LEVELS [LUX] FOR PROPOSED CONDITIONS

JUNE 21ST

CLEAR SKY – 03:00 PM

Analysis Grid
RAD Illuminance



LUX

500	450	400	350	300	250	200	150	100	50	0

The following images shows the light levels (LUX) at the reading tables with intermediate/ partly cloudy conditions, September 21st at noon under existing conditions:

View point 1 (the adult area)- the minimum LUX is 152 and the max is 189, well below the IES recommended 500 LUX lighting for small print reading.

View Point 2 (the children's area)- the minimum LUX is 180 and the maximum is 206, well below IES the recommended 500 LUX lighting for small print reading.

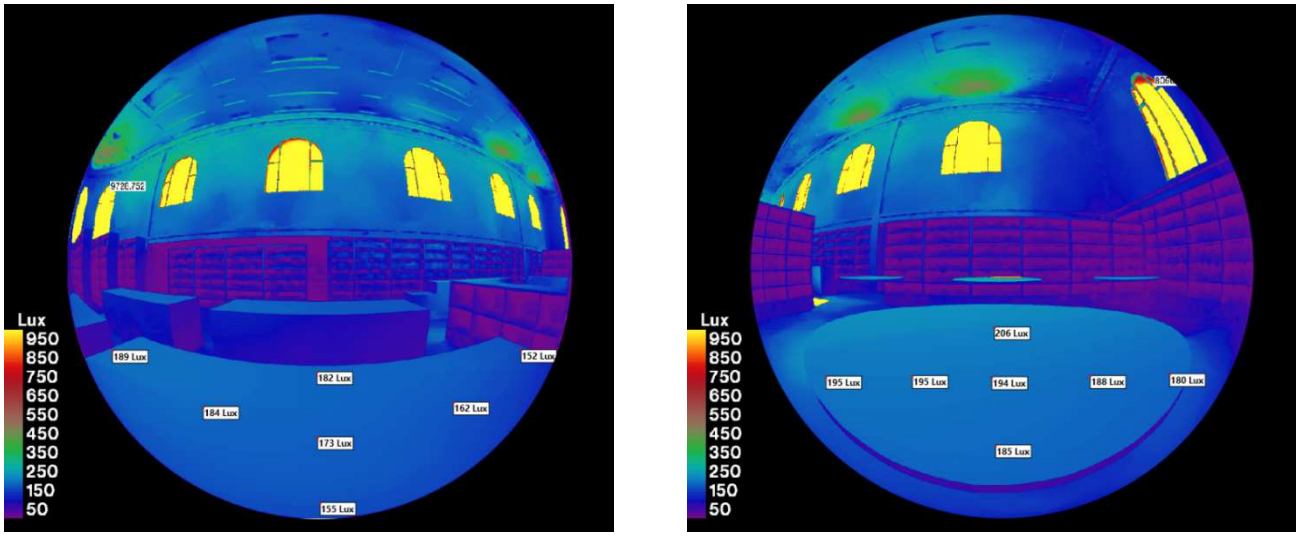


FIGURE **6**: LIGHT LEVELS AT TABLE UNDER EXISTING CONDITIONS ON SEPTEMBER 21ST AT NOON.

C. LUMINANCE & GLARE ANALYSIS:

After calculating luminance fisheye images for the adult and children's area viewpoints, analysis was done to calculate the Daylight Glare Probability (DGP) index. As mentioned in the Analysis Methodology, Chapter V, any DGP over .30 can be a source of unwanted glare by the observer.

The following tables and glare images show the results of the analysis, calculated during clear sky conditions (worst-case for glare), when the sky is at its brightest.

TABLE **5**: DAYLIGHT GLARE PROBABILITY INDEX FOR THE **ADULT READING AREA**.

SKY	**CLEAR SKY**		
DAY	*JUNE 21ST*		
TIME	9:00 AM	12:00 PM	03:00 PM
EXISTING DGP	0.212129	0.207914	0.198932
PROPOSED DGP	0.199746	0.204958	0.202397
% DIFFERENCE	**-5.8%**	**-1.4%**	**1.7%**

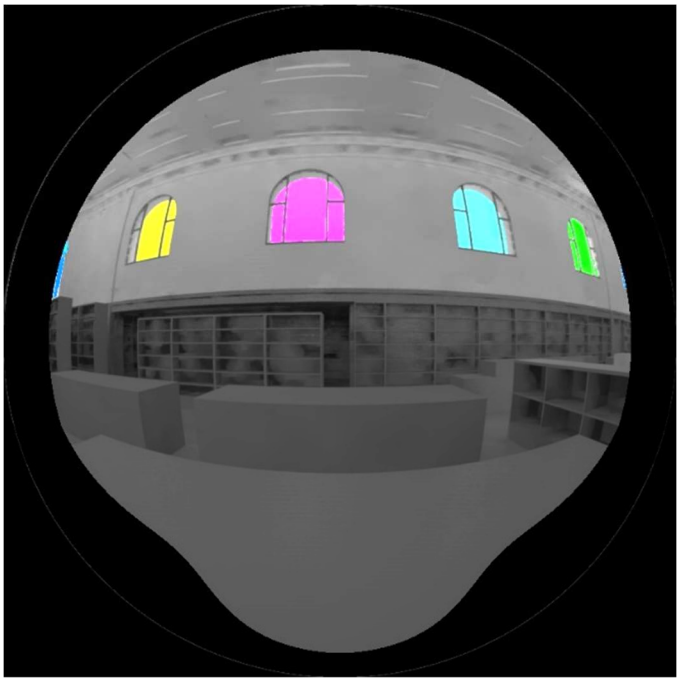


FIGURE **10**: SOURCES OF GLARE POTENTIAL AT THE **ADULT READING AREA**.

TABLE **6**: DAYLIGHT GLARE PROBABILITY INDEX FOR THE **CHILDREN READING AREA**.

SKY	CLEAR SKY		
DAY	*JUNE 21ST*		
TIME	9:00 AM	12:00 PM	03:00 PM
EXISTING DGP	0.190864	0.196406	0.210993
PROPOSED DGP	0.18921	0.195514	0.183943
% DIFFERENCE	-0.9%	-0.5%	-12.8%

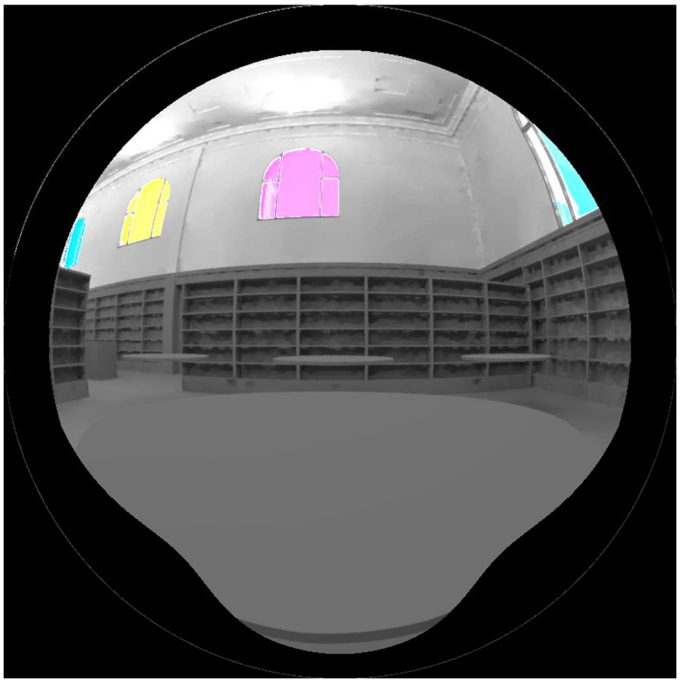


FIGURE **11**: SOURCES OF GLARE POTENTIAL AT THE **CHILDREN READING AREA**.

The proposed project mostly reduces any glare potential to the library, and ALL the DGP values, for both the adult and children's reading areas, are comfortably under the 0.30 threshold, **thus not a significant source of concern for visual comfort for most patrons.** ■

V. ANALYSIS METHODOLOGY

SYMPHYSIS utilized various tools to develop this daylight impact analysis. Here is a breakdown of the analysis process, and the tools used at each stage of the analysis:

A. 3D MODELING:

A 3D model of the existing and proposed conditions was created within a CAD software using the 2D drawings from the architect of the proposed project. For the purposes of this analysis, the "proposed condition" refers to the environment inside the library with the proposed vertical and horizontal addition at 2651-53 Octavia. The "existing condition" refers to the environment in the library currently. The surrounding buildings of blocks were constructed from the latest GIS layer of San Francisco building footprints obtainable at data.sfgov.org. The heights of the buildings were derived from photogrammetric model from Google Earth. Due to highly variability in height, opacity during seasons, growth and maintenance, existing trees were not modeled for this analysis.
The library was modeled using the latest approved building permit set #2009-0527-9175 dated 06/26/09, provided by the Planning Department, Environmental Planning Division, with the approved stamp date of 11/16/2009. The 3D model of the library includes all necessary and relevant details for daylighting analysis: wall thickness, glazing (window) areas, mullions and furniture.

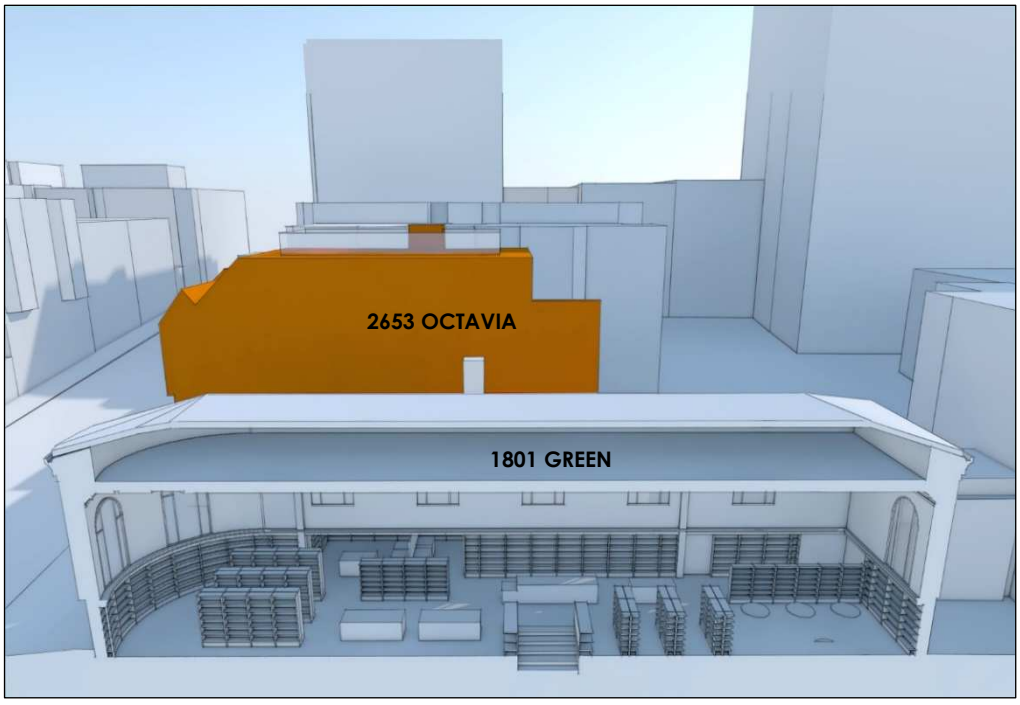
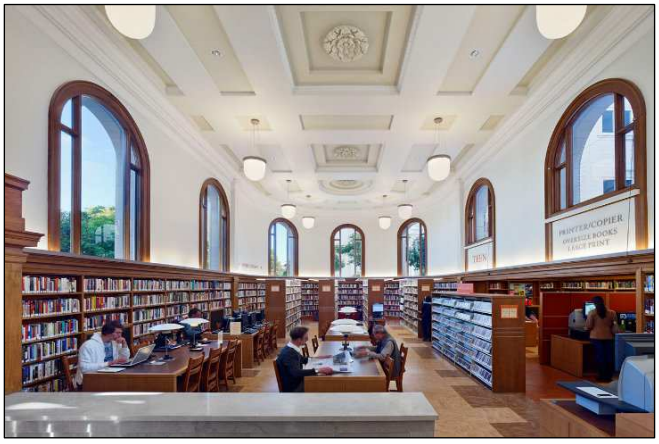


FIGURE **12**: 3D MODELING OF PROPOSED PROJECT AND LIBRARY.



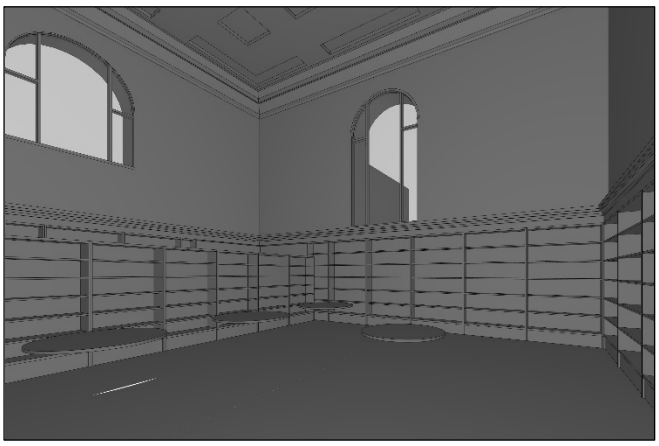
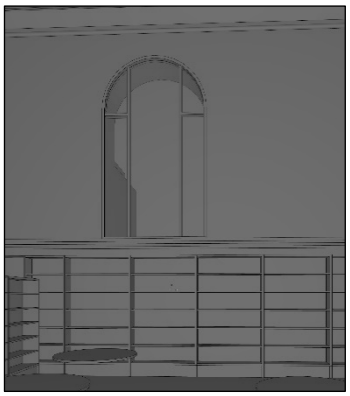


FIGURE **13**: COMPARISONS OF PHOTOGRAPHS VERSUS 3D MODEL.

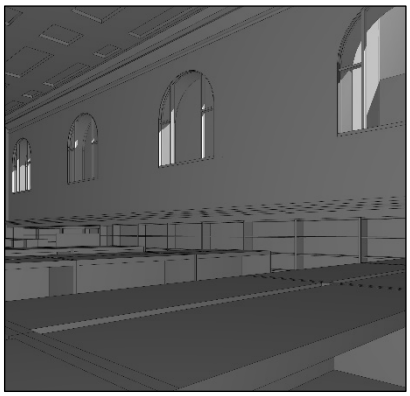
The library's furniture layout has been visually verified against the plans provided by the Planning Department to ensure no changes were made post-renovation. The following photographs were taken between December 2018 and January 2020 to support the validity of the 3D model used in the study:

DECEMBER 2018



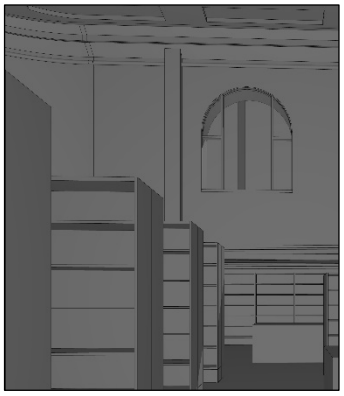
3D MODEL

DECEMBER 2018



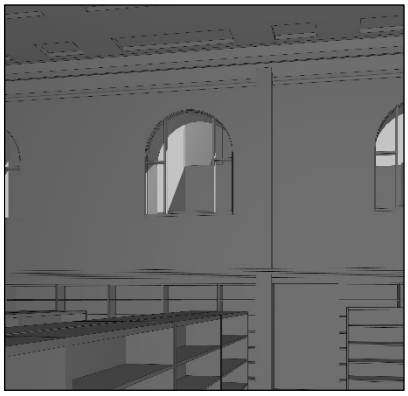
3D MODEL

DECEMBER 2018



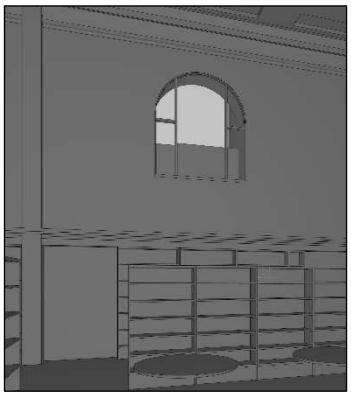
3D MODEL

DECEMBER 2018



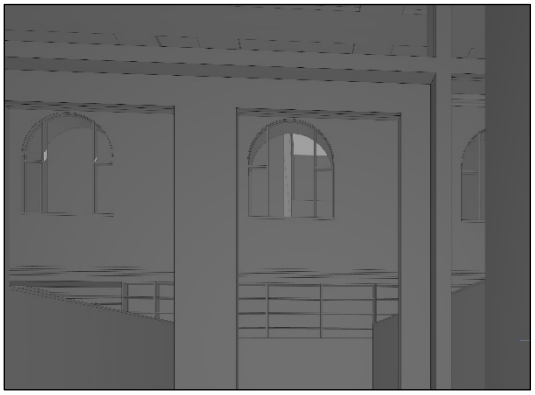
3D MODEL

DECEMBER 2018



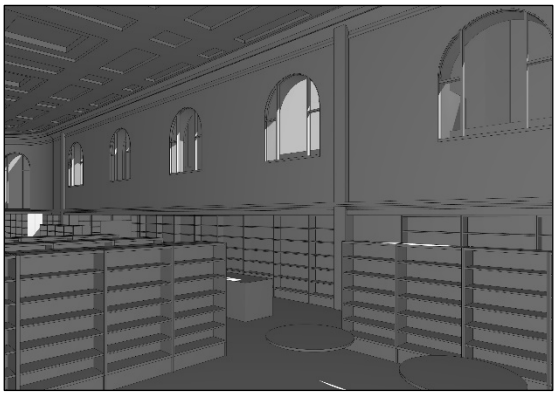
3D MODEL

NOVEMBER 2019



3D MODEL

JANUARY 2020



3D MODEL

JANUARY 2020

3D MODEL

B. MATERIALS & REFLECTIVITY

The existing materials present within and outside the library affect the overall light levels reaching the library's main reading room. This is due to the inherent reflectivity of every material. It is important to assess the materials present to determine their reflectivity, in order to derive material files that can be read by the daylighting engine, which performs the Radiance calculation.

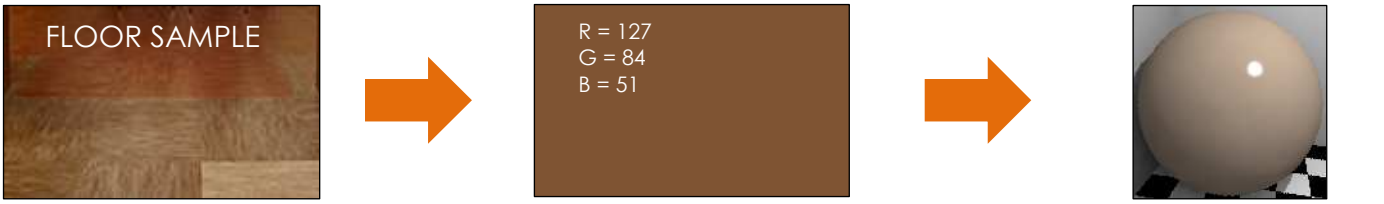
Eleven (11) different materials were identified to conduct this study:

- Library Floor
- Library High Walls
- Library Ceiling
- Library Dark Wood (including low walls and all furniture)
- Library Exterior Walls
- Library Low Roof (low flat roof at South side of the library)
- Exterior Walls of the existing and proposed project (assumed similar)
- Urban Fabric (an average of all buildings surrounding the library)
- Street
- Library Entry Stairs
- Glazing

For each material, a sample image was selected which was most representative of the material's inherent qualities. For the Urban Fabric, aerial photographs were used. The image was processed to derived its average color, using an online tool available here. Using this average color, another tool was used to derive the material file that will be necessary for the calculations.

The glazing material was created using another tool called Glazing Calculator which defines glazing material files for Radiance based on its type, its maintenance factor, and other variables. The calculator derived a final total transmittance (VT) of 0.62, which is very much in line with what typical code compliant glazing would have been in 2009. The Title 24 report refers only to the code maximum Solar Heat gain Coeficient at the time of 0.40. Given that only the southern windows were replaced and the older ones have high transmittance (older windows with no low-e or high SHGC), the value of 0.62 VT was appropriate to the study.

The images below shows evaluation the process:




```
# Reflectance: rho=0.319
void plastic identifier
0
0
5  0.35 0.265 0.2  0.05 0.05
```

FIGURE **14**: DERIVATION OF RADIANCE MATERIAL FILES

A complete list of all the material files can be found in the appendices.

C. ECOTECT PERFORMANCE SIMULATION SOFTWARE

The 3D model was imported into the environmental performance simulation software Autodesk Ecotect for analysis. This software allows the user to setup all the calculation settings required for this study, and acts as a platform to the Radiance lighting simulation engine, as well as the display of the results.

An analysis grid was set up over the entire floor of the library, which consisted of 2,406 sensor points spread one foot apart. The grid was set 3 feet above the finished floor, which is 2" above the highest working surface (information desk is 2' 10" high). Sensors were eliminated under the library's book stacks so that the results were not skewed by "blind sensors".

The image below shows the set-up of the analysis grid on the library floor:

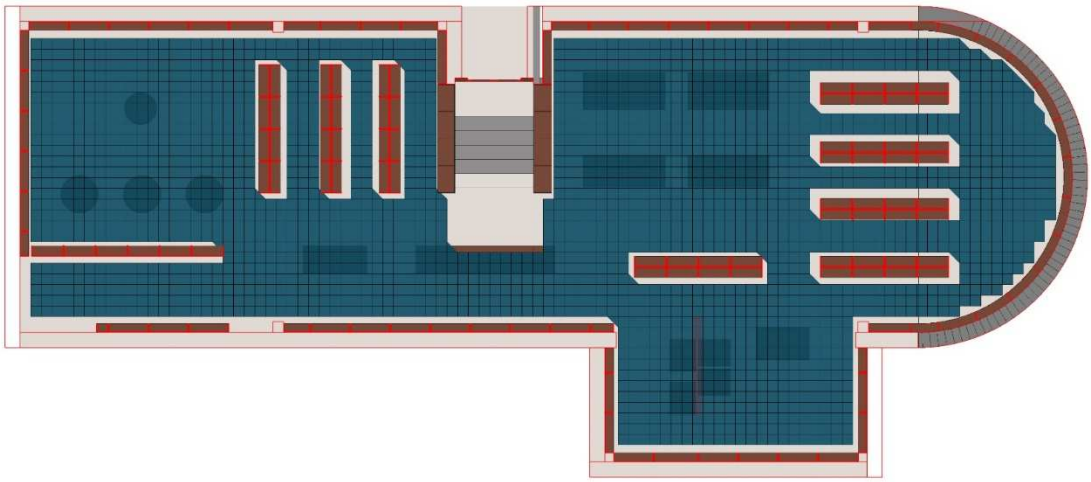


FIGURE **15**: ANALYSIS GRID SETUP ON LIBRARY MAIN FLOOR.

D. RADIANCE CALCULATIONS

For this study, Radiance, the most widely used lighting simulation engine, was selected. Radiance calculates both illuminance and luminance values. Illuminance is the amount of light that reaches a surface plane, such as a desk. It is very important to measure its value and assess whether there is enough light available to perform specific task without impacting visual comfort and acuity. The Illuminating Engineering Society (IES) provides the following recommended illuminance levels for libraries:

TABLE **7**: IES RECOMMENDED LIGHT LEVELS FOR LIBRARIES

SPACE	**RECOMMENDED ILLUMINANCE fc (LUX)**
Active Book Stacks	6–35 (60-350)
Inactive Book Stacks	5 (50)
Circulation and Reference Desk	30 (300)
Computer Areas	30 (300)
Reading (normal size and contrast)	30 (300)
Reading (very smal size and low contrast)	50 (500)

When light levels fall below these recommended ranges, it becomes necessary to supplement daylight with artificial (electric) light to avoid visual strain.

While most daylight studies perform daylighting analyses for a single worst-case scenario (overcast sky, no sun), this study analyzed 3 different sky conditions for 3 different times of the day, for both existing and proposed conditions, totaling 14 different lighting conditions (since overcast skies have no sun, there are no specific time of day or day of year).

Radiance uses "Standard Skies" to evaluate the luminance distribution from the sky dome under certain conditions. For this study, 3 sky conditions were used:

- CIE Standard Overcast Sky: no sun, brightest at the zenith.
- CIE Intermediate Sky: partly clouded sky with some sun.
- CIE Clear Sky: full sun, clear sky.

Each of these standard skies has a specific embeded algorithm that gives the Radiance engine the proper light distribution over the entire sky dome. In this study, the Intermediate Sky was renamed "partly cloudy" for clarity.

The images below show the 3 standard skies used in this study:

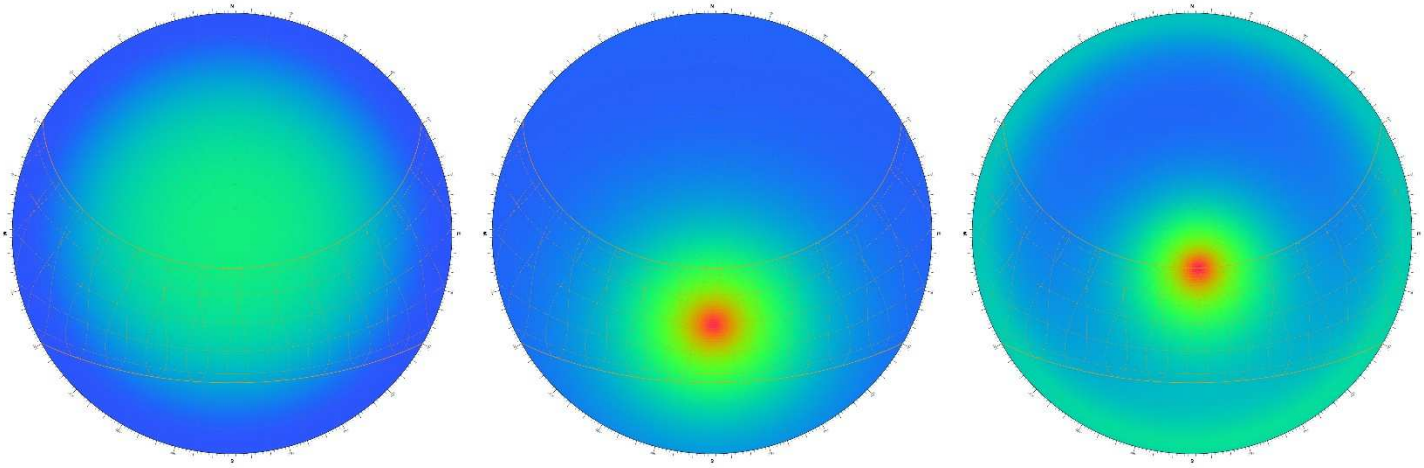


FIGURE **16**: CIE OVERCAST SKY, CIE INTERMEDIATE SKY, CIE CLEAR SKY.

The analysis was conducted for 2 dates of the year to cover a wide variety of sky conditions: June 21st with a clear sky model (best case, highest light levels) and September 21st with a partly cloudy model (intermediate light levels). Because there is no sun on overcast days (worst-case, low light levels), there is minimal variability in light levels during the day, thus this sky condition can be applied to any time of the day and any day of the year. For the clear sky and partly cloudy scenarios, when the sun in present, three times were analyzed 9am, 12pm, and 3pm.

While the standard skies give us the illuminance distribution for each sky condition, it does not give us the illuminance value from the sky itself. This is derived from the Design Sky value, which is the 15th percentile (exceeded 85% of the time) illumination value of the sky, calculated from the San Francisco weather file (USA_CA_San.Francisco.Intl.AP.724940_TMY3.epw). This analysis used a Design Sky value of 8,500 LUX.

Illuminance calculations were completed for each sky condition and time of day described above, for both the existing and proposed conditions, at each of the 2406 sensor points of the analysis grid. After all calculations were completed, the existing condition illuminance results were subtracted from the proposed results then divided by the existing results to create an illumination percentage difference. The percentage difference maps are very useful to identify where reduction of light levels might occur within the library.

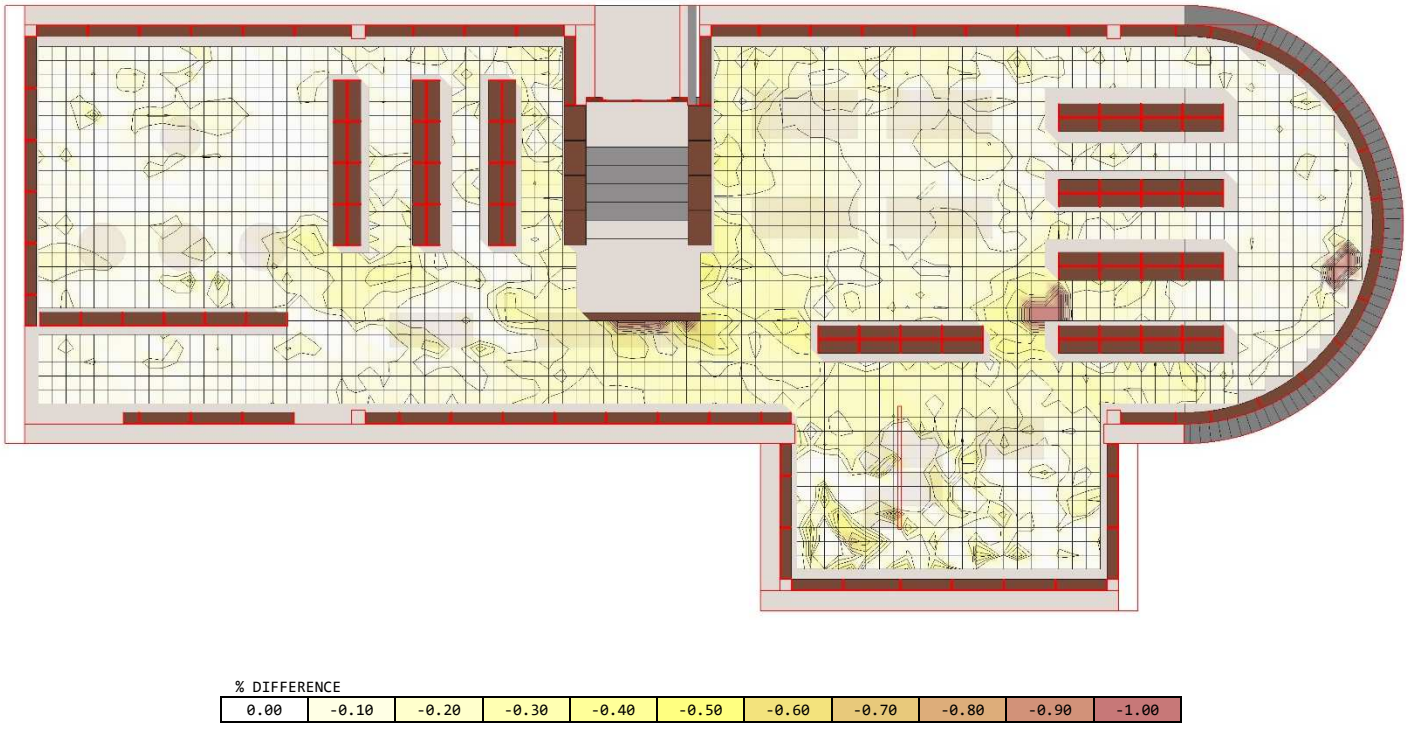


FIGURE **17**: EXAMPLE OF AN ILLUMINATION PERCENTAGE DIFFEERENCE MAP.

Radiance also calculates reflected luminance values, where one can assess the level of brightness within a space and identify potential glare issues that might impact the visual acuity and comfort.

Luminance calculations are best completed using a fisheye image that would represent the field of view of a person in a specific location. For this study, two view points were created, viewpoint 1 at the desk of the adult reading area and viewpoint 2 at the children's area.

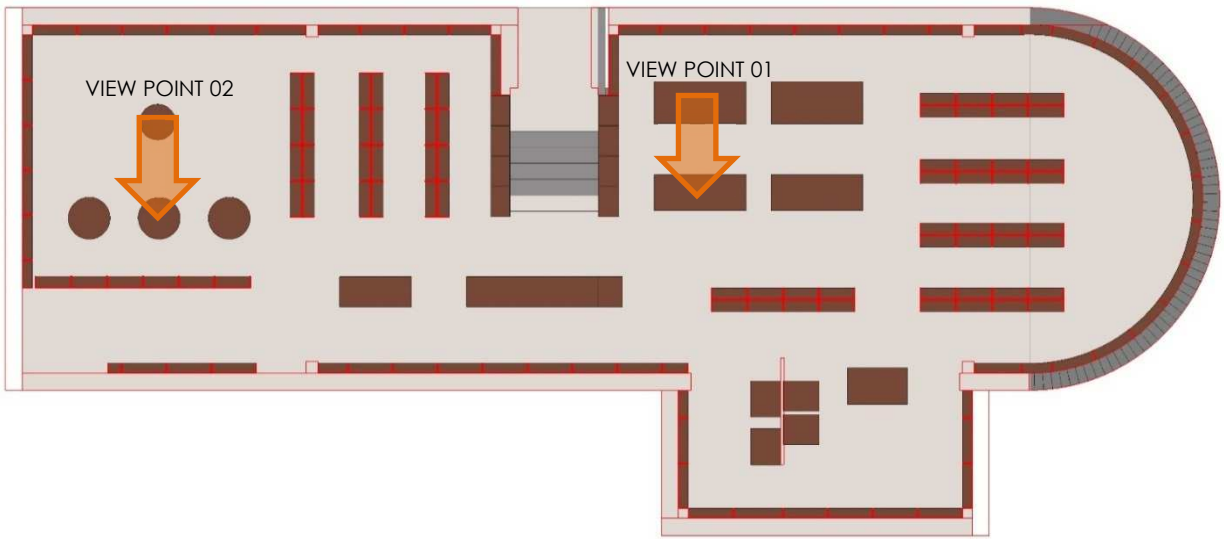


FIGURE **18**: LUMINANCE VIEW POINTS LOCATION.

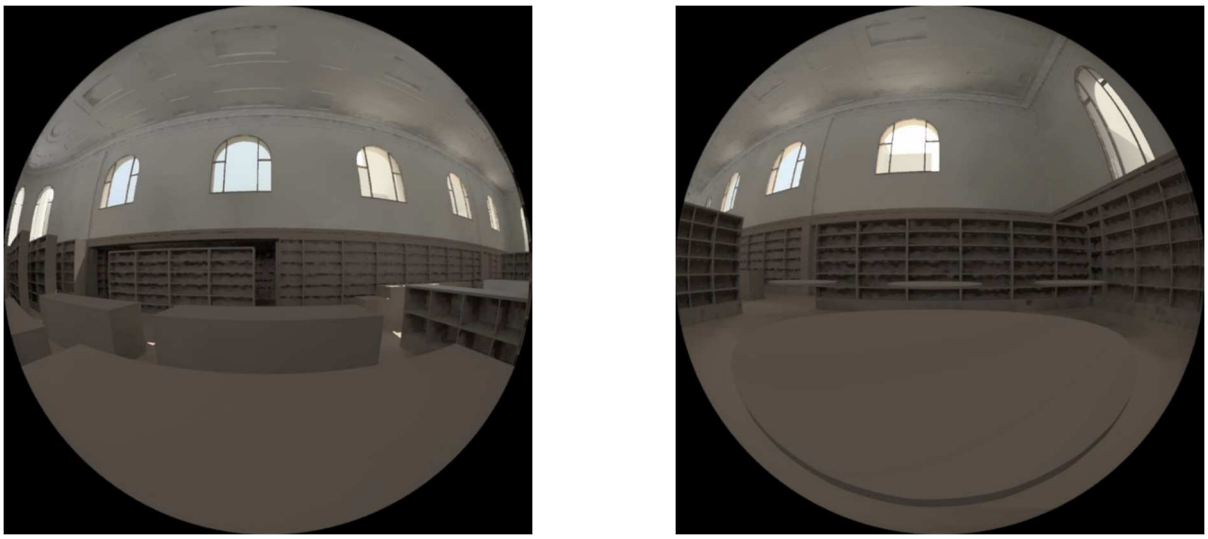


FIGURE **19**: VIEW POINT 01 AND VIEW POINT 02

The viewpoint images are then analyzed to assess any sources of brightness and potential glare. For this study, the appropriate index to use in this study is the Daylight Glare Probability index (DGP). DGP below .30 is imperceivable to the human eye and no glare is perceived. DGP between .30 and .45 is perceivable and a source of concern. DGP above .45 is intolerable.

Finally, a Daylight Autonomy analysis was done for the library's main reading room. Daylight Autonomy analysis calculates the percentage of time daylight levels are above a specified target illuminance value at a specific date and time. This is valuable to determine areas that are below the selected illuminance threshold and require supplemental lighting (electrical lights). For this study, the target illumination value was set to 400 LUX (40 fc) and the time of calculation was set at the library's opening hours of 10:00 am to 8:00 pm for all days of the week, all year long.

Radiance requires many parameters settings in order to do the calculation accurately and efficiently, depending on the size of the model, and the time required for each calculation. For reference, the radiance settings used in this study are included in the appendices. ■

VI. APPENDICES

A. MATERIALS RADIANCE FILES

The following are the Radiance material files that were used in the analysis. Each material includes its color, reflectivity, specularity and roughness:

```
LIBRARY FLOOR
H                              26
S                            0.43
L                            0.35
SPECULARITY                  0.05
ROUGHNESS                    0.05
REFLECTANCE                 0.319
# Reflectance: rho=0.319
void plastic identifier
0
0
5  0.35 0.265 0.2  0.05 0.05
```

```
LIBRARY WALLS
H                              38
S                            0.09
L                            0.83
SPECULARITY                  0.02
ROUGHNESS                     0.2
REFLECTANCE                 0.811
# Reflectance: rho=0.811
void plastic identifier
0
0
5  0.83 0.803 0.755  0.02 0.2
```

```
LIBRARY CEILING
H                              37
S                            0.11
L                            0.77
SPECULARITY                  0.02
ROUGHNESS                     0.2
REFLECTANCE                 0.748
# Reflectance: rho=0.748
void plastic identifier
0
0
5  0.77 0.738 0.685  0.02 0.2
```

```
LIBRARY DARK WOOD
H                              22
S                            0.37
L                            0.27
SPECULARITY                  0.02
ROUGHNESS                     0.1
REFLECTANCE                 0.237
# Reflectance: rho=0.237
void plastic identifier
0
0
5  0.27 0.207 0.17  0.02 0.1
```

```
LIBRARY EXTERIOR WALLS
H                              39
S                            0.15
L                            0.46
SPECULARITY                     0
ROUGHNESS                    0.12
REFLECTANCE                 0.439
# Reflectance: rho=0.439
void plastic identifier
0
0
5  0.46 0.436 0.391  0 0.12
```

```
LIBRARY LOW ROOF
H                              46
S                            0.27
L                            0.79
SPECULARITY                  0.01
ROUGHNESS                     0.2
REFLECTANCE                 0.745
# Reflectance: rho=0.745
void plastic identifier
0
0
5  0.79 0.74 0.577  0.01 0.2
```

2653 OCTAVIA (E & N)

H	208
S	0.22
L	0.85
SPECULARITY	0.01
ROUGHNESS	0.12
REFLECTANCE	0.745

```
# Reflectance: rho=0.745
void plastic identifier
0
0
5  0.663 0.763 0.85  0.01 0.12
```

URBAN FABRIC

H	48
S	0.11
L	0.46
SPECULARITY	0
ROUGHNESS	0.2
REFLECTANCE	0.45

```
# Reflectance: rho=0.45
void plastic identifier
0
0
5  0.46 0.45 0.409  0 0.2
```

STREET

H	212
S	0.08
L	0.65
SPECULARITY	0
ROUGHNESS	0.3
REFLECTANCE	0.618

```
# Reflectance: rho=0.618
void plastic identifier
0
0
5  0.598 0.622 0.65  0 0.3
```

LIBRARY ENTRY STAIRS

H	330
S	0.01
L	0.56
SPECULARITY	0.05
ROUGHNESS	0.02
REFLECTANCE	0.578

```
# Reflectance: rho=0.578
void plastic identifier
0
0
5  0.56 0.554 0.557  0 0.02
```

LIBRARY GLAZING

```
# Total, dirt-corrected glazing transmittance after CIBSE LG10:1999
# JALOXA LG10 Glazing Calculator for Radiance
# http://www.jaloxa.eu/resources/radiance/lg10_glazing.shtml
# Glazing transmittance (A1.5) => 0.69
# - Double glazing clear float + low E glass
# Percentage loss of daylight compared with clean glazing (A1.5) => 10%
# - Urban
# - Commercial, educational - rooms used by groups of people, office equipment
# Special conditions multiplier for calculating maintenance factor (A1.10) => x 1
# - Normal vertical glazing
# Exposure multiplier for calculating maintenance factor (A1.11) => x 1
# - Vertical glazing
# - Normal exposure for location
# Maintenance factor  ==> 90%

# Total transmittance ==> 0.62
void glass glazing_mat
                                0
                                0
3  0.68 0.68 0.68

RGB adjusted for TVis
                              137
                              137
                              137
                      137,137,137
```

B. RADIANCE SETTINGS

The following Radiance settings were used for the Illumination calculations as well as the Luminance images:

Illuminance Settings:

-dp=256
-ar=200
-ms=0.24
-ds=0
-dt=.2
-dc=.25
-dr=0
-ss=1
-st=.5
-ab=3
-af=RCP.amb
-aa=.25
-ad=256
-as=0
-av=0.01 0.01 0.01
-lr=3
-lw=0.002

Luminance Settings:

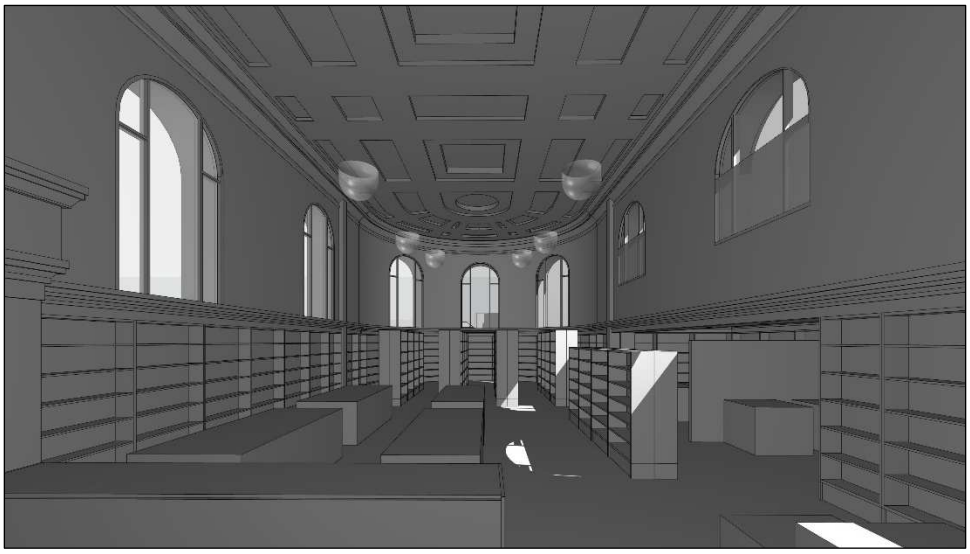
-dp=1024
-ar=476
-ms=0.24
-ds=.3
-dt=.1
-dc=.5
-dr=1
-ss=1
-st=.1
-ab=3
-af=RCP.amb
-aa=.15
-ad=768
-as=196
-av=0.01 0.01 0.01
-lr=6
-lw=0.002

SYMPHYSIS
Bioclimatic Design Consulting
435 S. ALEXANDRIA AVENUE #308
LOS ANGELES CA 90020
www.symphysis.net
info@symphysis.net

ILLUMINATION IMPACT ANALYSIS REPORT

SUN SHADE DEVICES IMPACT STUDY

FOR **Golden Gate Valley Library**



Report prepared by
Olivier PENNETIER, M.Arch, LEED AP, CEA
SYMPHYSIS
Bioclimatic Design Consulting
olivier@symphysis.net

TABLE OF CONTENTS

I. INTRODUCTION

SYMPHYSIS was hired to conduct a study to determine if dark grey shades are consistently used in the Golden Gate Valley Library, to analyze the impact the shades have on the illumination levels in the library, and to compare the results to the study previously conducted, which analyzed the impact of the proposed project on the illumination in library using natural light only in modeling.

Using photographic evidence from photos taken in all years 2013-2021 (see appendix), it was determined that there is consistent use of **dark grey shades**, which cover half the glass of all south facing windows, outlooking to 2651-53 Octavia Street. The shades are identified with 10% openness, filtering 90% of daylight through the glass.

SYMPHYISIS analyzed 2,406 individual points on the interior of the library's main reading room for the following conditions:

- Overcast sky (no sun) December 21st for all times of day, to represent the worst-case daylight conditions.
- Partly cloudy sky for September 21st at 9:00 am, 12:00 pm, and 3:00 pm, to represent the mid-season case daylight conditions.
- Clear sky for June 21st at 9:00 am, 12:00 pm, and 3:00 pm, to represent the best daylight conditions.

The report herein presents the results of this analysis. ■

Olivier A. Pennetier, M.Arch, LEED AP
SYMPHYSIS Principal

CABEC
California Association of Building Energy Consultants
CERTIFIED ENERGY ANALYST
CEA# R16-19-2017

Our services consist of professional opinions and conclusions developed in accordance with generally accepted environmental design, solar engineering and daylighting design principles and practices. Our conclusions and recommendations are based on the information provided by the clients, USGS Digital Elevation Model and publicly available Geographic Information System database.

II. ANALYSIS SUMMARY

SYMPHYSIS concludes that the dark grey, light filtering shades have a significant impact on the overall illumination levels within the Golden Gate Valley Library.

The daily average differences in illumination levels between shades up and shades down **are -13.6% for overcast skies, -24.5% for partly cloudy skies and -14.2% for clear skies**.

From the previous analyses calculated by SYMPHYSIS, the illumination differences in the library between the existing conditions and the proposed conditions (with the addition at 2651-53 Octavia) were **-4% for overcast skies, -11.1% for partly cloudy skies and -1.8% for clear skies**.

The dark grey shades have a significantly larger impact on the illumination in the library than the proposed project. It can be assumed that since the patrons and staff currently use the library with the dark shades covering half of all the south facing windows and have a positive experience, they should have a similar experience with the proposed addition at 2651-53 Octavia Street, which has less impact. If at any time additional light is desired, for both existing and proposed conditions, the shades can be easily lowered.

TABLE **1**: AVERAGE ILLUMINANCE (LIGHT LEVELS) VALUES FOR THE **ENTIRE LIBRARY MAIN FLOOR** (LUX).

SKY	**OVERCAST SKY**	**PARTLY CLOUDY SKY**			**CLEAR SKY**		
DAY	*ALL DAYS OF YEAR*	*SEPTEMBER 21ST*			*JUNE 21ST*		
TIME	ALL TIMES OF DAY	9:00 AM	*9:00 AM*	*12:00 PM*	*03:00 PM*	12:00 PM	03:00 PM
EXISTING AVG LUX	114.28	218	239.02	150.68	820.71	538.09	390.62
PROPOSED AVG LUX	98.78	192.06	140.09	120.39	755.99	427.68	335.59
% DIFFERENCE	-13.6%	-11.9%	-41.4%	-20.1%	-7.9%	-20.5%	-14.1%
DAILY AVERAGE	**-13.6%**	**-24.5%**			**-14.2%**		

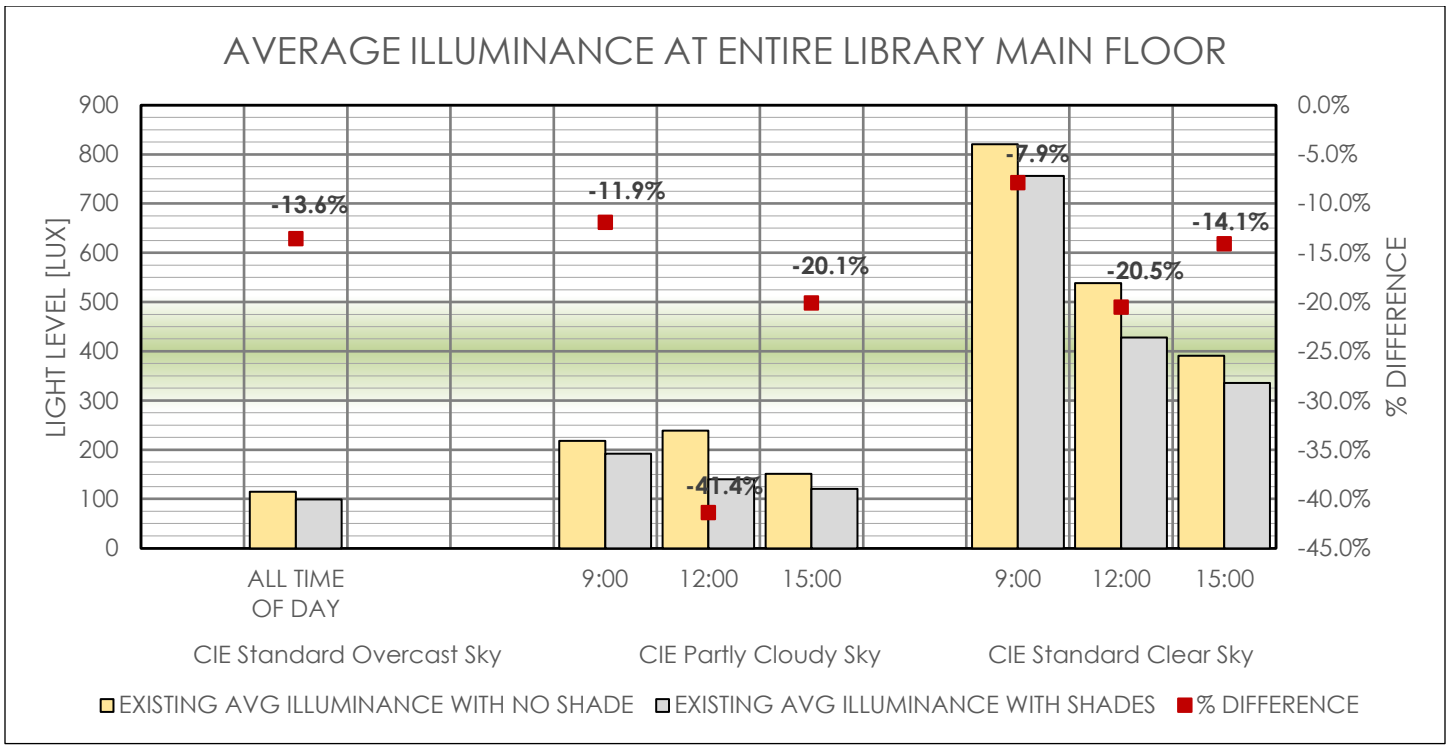


FIGURE **1**: GRAPH OF AVERAGE ILLUMINANCE VALUES FOR THE **ENTIRE LIBRARY MAIN FLOOR.**

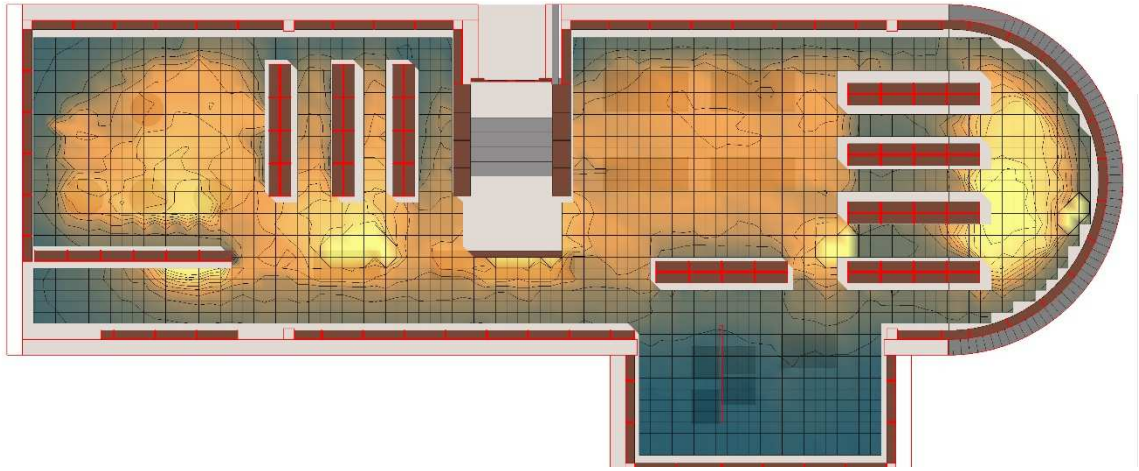
B01

DAYLIGHT LIGHT LEVELS [LUX] WITH AND WITHOUT SHADES

SEPTEMBER 21ST PARTLY CLOUDY SKY – 12:00 PM [worst case]

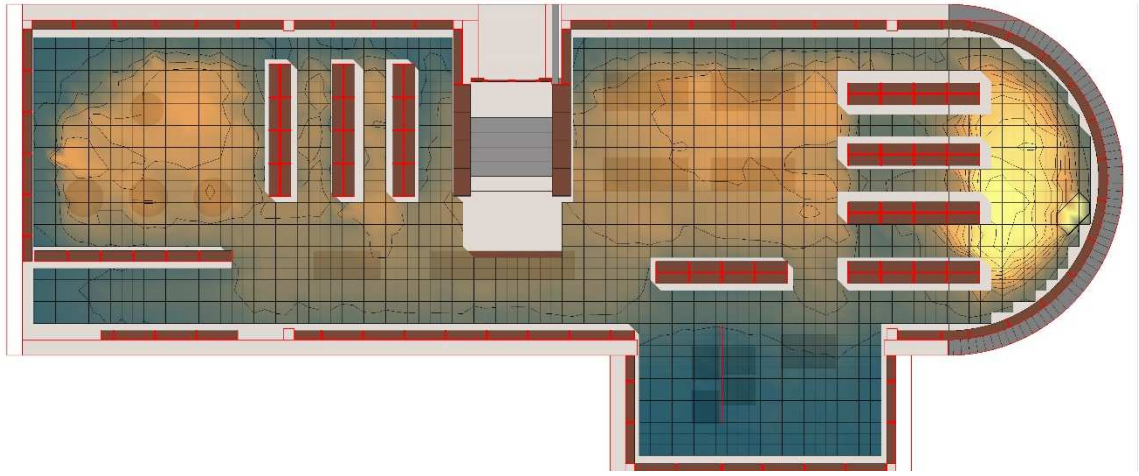
EXISTING - NO SHADES

AVERAGE = 239.02 LUX



EXISTING - WITH SHADES

AVERAGE = 140.09 LUX

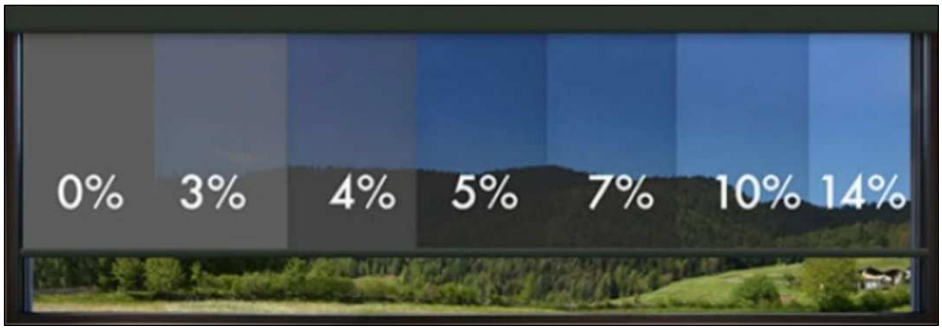


ILLUMINATION LEVELS [LUX]										
+500	450	400	350	300	250	200	150	100	50	0

III. APPENDICES

A. SUN SHADING DEVICES PARAMETERS

It was assessed by photographs and on-site visits that the shading devices are similar to a charcoal gray fabric with 10% openness. Additional information on shading fabric openness can be found at this link: [Zebra Blinds Blog on openness]



The existing library's shading devices located on the five southern windows:

B. EVIDENCE THAT SUN SHADES ARE DRAWN UP UNDER NORMAL CONDITIONS

Here is a list of links pointing to numerous photographs showing sun shades drawn up within the library, between 2013 and 2021:

Google Street Views:

Dec 2013	Feb 2014	Jan 2015	Jun 2016	Feb 2017	Mar 2018	April 2019
	June 2014	Oct 2015		Sept 2017	Jun 2018	
	Sept 2014	Nov 2015		Dec 2017		
	Aug 2014					
	Nov 2014					

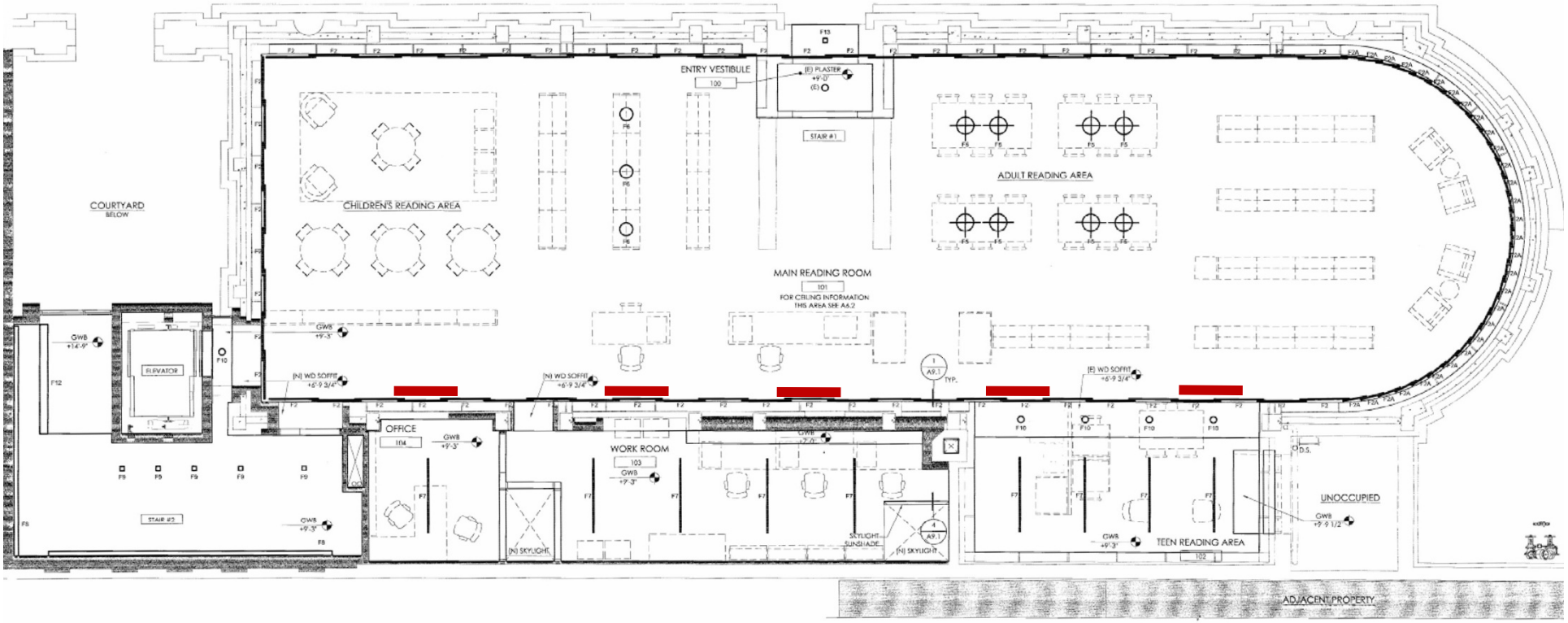
Library Patrons Internet Photographs:

Sept 2017	Feb 2019	Feb 2021
	April 2019	

Project Sponsor's Photographs – verified by Metadata:

Owner Photos

C. SUN SHADES LOCATION



SUN SHADE

1 MAIN LEVEL REFLECTED CEILING PLAN

SCALE: 1/4" = 1'-0"

N

SUN SHADING DEVICE LOCATION, AS USED IN THE LIGHTING SIMULATION.

SYMPHYSIS
Bioclimatic Design Consulting
435 S. ALEXANDRIA AVENUE #308
LOS ANGELES CA 90020
www.symphysis.net
info@symphysis.net

From: Beth Silvestri (via Google Docs)
To: BOS Legislation, (BOS)
Cc: Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Subject: Letter of Support to the BOS Re: 2651-53 Octavia
Date: Thursday, April 15, 2021 8:49:10 PM

casasilvestri@gmail.com has attached the following document:

Letter of Support to the BOS Re: 2651-53 Octavia

Snapshot of the item below:

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

Dear Board of Supervisors,

My husband and I were homeowners in 94123 (District 7) since we purchased our first home on Bay Street in 1992, and our second home on Baker Street in 1998. As owners of houses built in the 1920s, we took on the big task to structurally upgrade and remodel the properties; construction projects I greatly enjoyed. I found it reasonable to work with the SF Planning Department. We loved remodeling(!), living, working, and raising our three children in The City.

We then moved to Marin County with the intention of moving back to The City after the pandemic. It is my plan to find another home in need of TLC and spend the next 30+ years back in my hometown. However, when I hear of the difficulty the owners of 2651-53 Octavia Street have experienced for the past 2 ½ years with their proposed project, I think twice about returning to San Francisco.

The remodel plans for 2651-53 Octavia meet all California and San Francisco laws, codes, and design guidelines. The proposed remodel project was designed to protect the character of the adjacent building, the historic Golden Gate Valley Library. The owners undertook an extensive shade study performed by Symphysis for various dates of the year, times of day and conditions of sky. After examining the illumination and shade reports, it does not appear that the library lighting will be adversely impacted by the remodel. The beautiful library can continue to benefit from its use of daylight and electrical lights, plus the window shades are easily adjusted to patron needs.

I urge you to **deny the appeal** and validate the Categorical CEQA Exemption that the SF Environmental Planning Department granted to 2651-53 Octavia. I **support** the owner and project sponsor of 2651-53 Octavia in the Appeal hearing on April 20, 2021. (Case No. 2018-011022 PRJ)

The property will be improved by the remodel and the patrons of San Francisco
will enjoy the Golden Gate Valley Library in the same capacity as they do today. Thank you for your reasonable consideration of this proposed reasonable project at 2651-53 Octavia.

Sincerely yours,

Elizabeth Silvestri
PO Box 543
Stinson Beach, CA 94970

From:	Lew, Lisa (BOS)
To:	BOS Legislation, (BOS)
Subject:	FW: Letter in Support of Appeal Overturning the CEQA Categorical Exemption Determination
Date:	Thursday, April 15, 2021 2:46:33 PM

From: Ellen Kiyomizu <ellenkiyomizu@scorch.biz>
Sent: Thursday, April 15, 2021 2:43 PM
To: Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>; ChanStaff (BOS) <chanstaff@sfgov.org>; Peskin, Aaron (BOS) <aaron.peskin@sfgov.org>; Haney, Matt (BOS) <matt.haney@sfgov.org>; Mar, Gordon (BOS) <gordon.mar@sfgov.org>; MandelmanStaff, [BOS] <mandelmanstaff@sfgov.org>; MelgarStaff (BOS) <melgarstaff@sfgov.org>; Preston, Dean (BOS) <dean.preston@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>; Safai, Ahsha (BOS) <ahsha.safai@sfgov.org>; Hilary.Ronen@sfgov.org
Cc: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Lew, Lisa (BOS) <lisa.lew@sfgov.org>
Subject: Letter in Support of Appeal Overturning the CEQA Categorical Exemption Determination

Re: 2651-2653 Octavia Street; Block 0553 Lot 002; Permit Number 201808036405; Board of Supervisors File # 210275

April 15, 2021

Dear Chairman Walton and the SF Board of Supervisors:

I have been a San Francisco resident for nearly 35 years as well as a San Francisco small business owner since 2006. I have been very disappointed when city leadership 'vote' in favor of private interests & developers which, step by step, erodes the quality of life of the tax paying individuals who live and work here. I am writing IN SUPPORT of the Golden Gate Valley Library Friends Appellant group, - a group of concerned SF residents seeking to protect the Golden Gate Valley branch of SFPL from a private development project which will cause irreparable harm to the library's character defining main reading room by reducing light entering the windows and reaching the solar panels.

1. The GGV branch of SFPL is the crown jewel of the 7 Carnegie libraries in SF and a historic architectural gem of the community. The grand scale of the library's reading room was designed in 1918 with windows on all sides, clearly intending to maximize light into the main

reading room. The Carnegie foundation specifically stipulated that sites for its libraries be chosen such that *"The site chosen should be such as to admit lite (sic) on all sides"*

1. The library underwent significant renovation in October 2012 to achieve LEED Gold certification. This was accomplished at great taxpayer expense in the amount of $8.5 million as well as significant private contributions by SF City residents.

1. New south-facing high performance windows controlling solar heat exchange and a new photovoltaic system on the south-facing roof providing 25% of the library's energy needs were key components of that renovation. The 2012 renovations sought to insure that light was an integral part of the library experience for generations to come.

1. As it stands, the residential building at 2651-2653 Octavia already blocks natural light into the Library's south-facing windows. This problem cannot be compounded, as it cannot be overstated how critical the quality of natural light is to any library, especially one over a century old.
2. The proposed additions to 2651-2653 Octavia will further block light from the South, undermining light into the main reading room, and altering the character and experience of the interior space, permanently and to the detriment of users.
3. In addition, significant shading cast onto the arrays of the solar panels directly above the south- facing windows will render them ineffective, cutting off the renewable energy supply and increasing the library's carbon footprint.
4. Daylight Impact and Shading Impact reports commissioned by the Planning Department reveal a number of methodological and interpretation inconsistencies. The Appellant group has had 5 internationally recognized professional experts independently analyze the reports. Experts have been consistent in their interpretations and concerns that the project as proposed will have a negative impact on the library

- Daylight Impact Study (December 2020) reveals decreased natural light into the south-facing windows, degrading the character and experience of the interior space
- Shading Impact Study (December 2019) reveals significantly reduced functionality of solar panels, to the point of ineffectiveness. These panels were specifically installed, at great taxpayer expense, to meet SF Clean Energy goals, which will no longer be achieved.

We should think very carefully before we allow a size and volume expansion of a private residence to have a negative impact on a treasured, historic PUBLIC asset belonging to all San Franciscans. Private developers should not be allowed to negatively impact historic public resources for personal gain.

We urge the Board of Supervisors to seriously consider the evidence from all these professional experts which refute the Planning Department's assertion of "minimal" impact of the proposed project on the GGV Library.

We respectfully ask that the Board of Supervisors accepts this Appeal, overturns the second CEQA Categorical Exemption issued in February 2021 and requests that the project sponsor explore an alternative plan, one that doesn't negatively impact the Golden Gate Valley Branch of the San Francisco Public Library.

Thank you for your consideration.

Ellen Kiyomizu
300 Third Street, #901
San Francisco, CA 94107
Partner, Scorch LLC
https://avanan.url-protection.com/v1/url?o=www.scorch.biz&g=YTJhN2U2NWRkZThiMGEyMQ==&h=OThhYzI4OTMzODI4MzM2MzZhOTE1OTQxN2I0NzI0NTIxMzQ1NDI0YzU0OTY3NWQ1NDNjMjZjYWVhZWZjNTk0NQ==&p=YXAzOnNmZHQyOmF2YW5hbjpvOmQzZThhZTFlMmQ5ZjFlMTQ1YWMwOGQyYWUwZDkzNzQ2OnYx

From:	Sheila Schroeder
To:	BOS Legislation, (BOS); Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Subject:	Letter of Support for Project Sponsor in Appeal of SF Planning Dept"s CEQA Exemption for 2651-2653 Octavia Street (Case No. 2018-011022 PRJ)
Date:	Wednesday, April 14, 2021 5:39:55 PM
Attachments:	image004103.png image909091.png image730272.png image104186.png

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident and have lived here for 25 years.

After taking a look at the Symphysis illumination and shade studies, I believe the Golden Gate Valley Library will not be significantly or substantially be harmed by the proposed remodel on the adjacent building.

Specifically, I have the following points:

1. I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.
2. The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.
3. The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.
4. The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.
5. The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and *validate* the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your

consideration.

Sincerely,

Sheila Schroeder

Private Ocean

Sheila Schroeder
Business Development Officer
Phone: 415.788.1952 | Fax: 888.246.8327
Email: sheila.schroeder@privateocean.com
www.privateocean.com | Securely Share Files
100 Smith Ranch Road, Suite 300 | San Rafael, CA 94903

Subject: FW: CEQA Appeal: 2651-2653 Octavia Street Project
Date: Friday, April 9, 2021 at 6:52:18 PM Pacific Daylight Time
From: Zushi, Kei (CPC)
Attachments: image001.jpg

From: "Lambert, Michael (LIB)" <michael.lambert@sfpl.org>
Date: Friday, February 5, 2021 at 12:20 PM
To: "Zushi, Kei (CPC)" <kei.zushi@sfgov.org>, "Bradley, Stacy (REC)" <stacy.bradley@sfgov.org>, "Singleton, Maureen (LIB)" <Maureen.Singleton@sfpl.org>, "Green, Heather (LIB)" <heather.green@sfpl.org>
Cc: "Gibson, Lisa (CPC)" <lisa.gibson@sfgov.org>, "Delneo, Catherine (LIB)" <catherine.delneo@sfpl.org>, "Lombardi, Roberto (LIB)" <Roberto.Lombardi@sfpl.org>, "Robinson, Todd (LIB)" <todd.robinson@sfpl.org>
Subject: RE: Connecting Planning & SFPL

Hi Kei and Stacy,

The Library has been tracking this proposed project and the neighbors' concerns and efforts to seek historic landmark designation. I have consulted with our Facilities Director and our Chief of Branches to arrive at the following conclusion:

- The Library is not concerned with the adjacent resident's renovation plans
  - The Library has no concern regarding the amount of light that will be able to enter the building and there is no concern regarding the solar panels on the roof
- The Library respects the jurisdiction of other city agencies (Planning, etc.) to oversee the approval of this project

My team can meet with you next week, their schedule permitting. Copying our Chief of Branches, Cathy Delneo, and Facilities Director, Roberto Lombardi, as well ours our Engineering Manager, Todd Robinson.

Thank you,

Michael Lambert | Pronouns (He, Him, His)
City Librarian
San Francisco Public Library
100 Larkin Street | San Francisco, CA 94102-4733
415.557.4232 | michael.lambert@sfpl.org

The San Francisco Public Library system is dedicated to free and equal access to information, knowledge, independent learning and the joys of reading for our

diverse community.

From:	John Baker
To:	BOS Legislation, (BOS); Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Subject:	Board of Supv and Environmental Planning support for the 2651-53 Octavia St project
Date:	Monday, April 12, 2021 8:43:44 AM
Attachments:	Letter to SF Board of Supervisors re 2651-53 Octavia St.pdf

Please forward the attached letter to the Board of Supervisors and Environmental Planning prior to the Appeal hearing on April 20, 2021.
Thank you,
John W. Baker

John W. Baker
301 Mission ST, APT #35C
San Francisco, CA 94105

April 11, 2021

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

RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's
CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Please forward to the Board of Supervisors and Environmental Planning this letter of SUPPORT for the owner and project sponsor of 2651-53 Octavia in the Appeal hearing on April 20, 2021.

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident for over 30 years, first moving here in 1990.

I am an ardent supporter of the San Francisco Library system and the role our libraries have played for years reaching the youth of our community and serving necessary supplemental education in our city. However, after examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building. The GGV Library can continue its mission long after the neighborhood friendly project at 2651-53 Octavia is completed according to the conscientious plans presented.

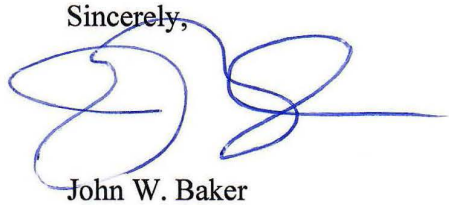
Specifically, I have the following points:

1) I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.
2) The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.

3) The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.
4) The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.
5) The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.

Sincerely,



John W. Baker

From: Susan Neal Nealfam
To: BOS Legislation, (BOS)
Subject: BOS Letter of Support
Date: Sunday, April 11, 2021 9:07:53 AM
Attachments: BOS Neighbor Support.pdf

Please see attached.

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

RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident and have lived here for over 30 years.

After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building.

Specifically, I have the following points:

1) I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.
2) The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.
3) The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.
4) The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.
5) The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.

Sincerely,

Susan Neal

Email addresses:

bos.legislation@sfgov.org
kei.zushi@sfgov.org
lisa.lew@sfgov.org
bos-supervisors@sfgov.org
angela.calvillo@sfgov.org

From:	Robert Vanderlaan
To:	BOS Legislation, (BOS); Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Subject:	2651-53 Octavia Project (Case No. 2018-011022PRJ)
Date:	Saturday, April 10, 2021 8:20:51 PM
Attachments:	2651-53 Octavia Project (Case No. 2018-011022PRJ).msg

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

RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Via E-Mail

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident and have lived here for 37 years.

After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building.

Specifically, I have the following points:

1) I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.
2) The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.
3) The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.
4) The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.
5) The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.

Sincerely,

Robert Vanderlaan
723 4th Ave. San Francisco, CA 94118

From: STEPHANI RIEHLE
To: BOS Legislation, (BOS); Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Subject: 2651-53 Octavia Street
Date: Saturday, April 10, 2021 11:48:35 AM

March 10, 2021
Angela Calvillo
Clerk of the Board
San Francisco Board of Supervisors
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's
CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)
Please forward to the Board of Supervisors and Environmental Planning this letter of SUPPORT for the
owner and project sponsor of 2651-53 Octavia in the Appeal hearing on April 20, 2021.
Dear Board of Supervisors,
We are writing today in support of the owners, Jane and Chris Cook, and the proposed project at 2651-53 Octavia Street. We are San
Francisco residents and have lived here for 33 years. My husband and I are both children of public school teachers and great supporters of the Golden Gate Valley Library as well as all public libraries in San Francisco and believe they are of great importance to the City. In this case, only the most minimal of light disturbance would be caused by the addition and the owners should be able to move ahead.
After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library
will not significantly or substantially be harmed by the proposed remodel on the adjacent building.
Specifically, we have the following points:
1) We understand that a CEQA protects historically significant buildings from substantial adverse effects on
its character defining features. With the proposed project, we find the illumination and shade differences
do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the
same capacity as it does today.
2) The normal light condition in the library is daylight and electric lights, used in combination during open
hours. The difference in illumination between the existing light and the light with the proposed addition
is minimal at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.

3) The library has 14 windows that encircle the building, and the only widows that are potentially affected
are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural
light.
4) The sun shades on the south facing windows have a greater impact on light than the proposed project
would have. These shades can be easily adjusted to suit library patron needs.
5) The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well,
there are no codes or laws protecting solar panels from development of adjacent properties.
We urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco
Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.
Sincerely,
Stephanie and Paul Riehle
2453 Filbert Street
San Francisco, CA 94123
415 244-2643

From:	Board of Supervisors, (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides; BOS-Administrative Aides
Cc:	Calvillo, Angela (BOS); Somera, Alisa (BOS); Ng, Wilson (BOS); BOS Legislation, (BOS)
Subject:	FW: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)
Date:	Monday, April 12, 2021 8:20:22 AM

From: Ruth Levy <rjlevy50@yahoo.com>
Sent: Saturday, April 10, 2021 10:44 AM
To: BOS-Supervisors <bos-supervisors@sfgov.org>
Subject: Fw: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Angela Calvillo

Clerk of the Board

San Francisco Board of Supervisors

RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's

CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Dear Board of Supervisors:

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident and have lived here for 70 years.

After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building.

Specifically, I have the following points:

1) I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.

2) The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.

3) The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.

4) The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.

5) The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.

Sincerely,

Ruth J. Levy

From:	Elizabeth Munz
To:	BOS Legislation, (BOS); Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Subject:	Support for project at 2651 Octavia
Date:	Friday, April 9, 2021 4:06:30 PM

Angela Calvillo

Clerk of the Board

San Francisco Board of Supervisors

City Hall, Room 244

1 Dr. Carlton B. Goodlett Place

San Francisco, CA 94102

RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's

CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident and have lived here for 42 years.

After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building and that this project should be allowed to proceed.

Specifically, I have the following points:

--[if !supportLists]-->1) <!--[endif]-->The proposed project has gone through a thorough review, including evaluation from Environmental Planning and a detailed shade study. It has received approvals from the Planning Commission in two separate occasions. Continuing delays of this nature make San Francisco a difficult environment to build in, especially for small construction projects. The experts have spoken!

--[if !supportLists]-->2) <!--[endif]-->Although CEQA protects historically significant buildings from substantial adverse effects on its character-defining features, it does not appear that the illumination and shade differences of this project qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.

--[if !supportLists]-->3) <!--[endif]-->The normal light condition in the library is daylight and

electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2% partly cloudy sky, -1.0% overcast sky.

--[if !supportLists]-->4) <!--[endif]-->The library has 14 windows that encircle the building, and only 3 are potentially affected. Those windows are consistently 50% covered by dark grey shades that already filter 90% of the natural light.

--[if !supportLists]-->5) <!--[endif]-->The sun shades on the remaining south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.

--[if !supportLists]-->6) <!--[endif]-->The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.

Sincerely,

Elizabeth Munz

154 Ewing Ter

San Francisco, CA 94118

From:	Colette Zee
To:	BOS Legislation, (BOS); Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Cc:	Cook Jane
Subject:	CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)
Date:	Thursday, April 8, 2021 6:28:42 PM

Angela Calvillo

Clerk of the Board

San Francisco Board of Supervisors

City Hall, Room 244

1 Dr. Carlton B. Goodlett Place

San Francisco, CA 94102

RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's

CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street.

> We all feel fear when we hear that our next door neighbor is expanding. But as I homeowner, I also rely on an even playing field, where - even I - cannot block my neighbor's legal expansion - just because I perceive them to be taking space, light, privacy away from me (which all expansions do). Neighbors are always against expansion, but this fear does not give them the right to deprive others of their rights to legally expand or to impose onerously expensive requirements, just because they are afraid.
>
> The impact on light in the library is minimal. In fact, the library has shades because there is TOO MUCH light at times. It is a neighborly and responsible project, abiding by all of the current zoning and setback restrictions. There are buildings in the area, built before the current planning requirements were enacted, that exceed current height and setback restrictions. This building abides by the current restrictions, please judge it fairly.
>
> I am a San Francisco resident and have lived here for 22 years.

After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building.

Specifically, I have the following points:

--[if !supportLists]-->1) <!--[endif]-->I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.

--[if !supportLists]-->2) <!--[endif]-->The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.

--[if !supportLists]-->3) <!--[endif]-->The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.

--[if !supportLists]-->4) <!--[endif]-->The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.

--[if !supportLists]-->5) <!--[endif]-->The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.

Sincerely,

Colette Zee & family Herrick

36 Barcelona Ave.
San Francisco, CA 94115

From:	Misty Phenicie
To:	BOS Legislation, (BOS); Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Cc:	Tony Avila; jcotecook@gmail.com
Subject:	Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)
Date:	Thursday, April 8, 2021 9:51:29 AM
Attachments:	BOS Neighbor Support Ltr.docx

Please see attached letter supporting the proposed renovation set forth in the attached letter.

Thank you,

Misty C. Phenicie
Sent on behalf of **Tony Avila**
Resident at 2741 Buchanan St., San Francisco, CA 94123

Misty C. Phenicie, Executive Assistant
Encore Capital Management

Phone: 415-561-0600
Web: https://www.encorecm.com
Email: misty.phenicie@encorefunds.com
770 Tamalpais Dr #401B, Corte Madera, CA 94925

April 8, 2021

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

RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Please forward to the Board of Supervisors and Environmental Planning this letter of SUPPORT for the owner and project sponsor of 2651-53 Octavia in the Appeal hearing on April 20, 2021.

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident and have lived at 2741 Buchanan Street for several years.

After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building.

Specifically, I have the following points:

1) I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.
2) The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.
3) The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.
4) The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.
5) The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.

Sincerely,

Tony Avila

From:	Ann Arora
To:	BOS Legislation, (BOS); Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Subject:	RE: Letter of Support for ProjectSponsor in Appeal of San Francisco Planning Department's CEQAExemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)
Date:	Thursday, April 8, 2021 7:10:54 AM

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

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident and have lived here for __20_____ years.

After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building.

Specifically, I have the following points:

1) I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.
2) The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.
3) The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.
4) The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.
5) The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for

your consideration.

Sincerely,

Ann Arora
740 Euclid Ave
SF, 94118

--

From:	anita demas
To:	BOS Legislation, (BOS); Zushi, Kei (CPC); Lew, Lisa (BOS); BOS-Supervisors; Calvillo, Angela (BOS)
Subject:	Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)
Date:	Wednesday, April 7, 2021 1:44:26 PM

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

RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's

CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Please forward to the Board of Supervisors and Environmental Planning this letter of SUPPORT for the owner and project sponsor of 2651-53 Octavia in the Appeal hearing on April 20, 2021.

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident and have lived here for 28 years.

After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building.

Specifically, I have the following points:

1) I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.

2) The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is minimal at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.

3) The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.

4) The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.

5) The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.

Sincerely,

Anita N. Demas, MD

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

RE: Letter of Support for Project Sponsor in Appeal of San Francisco Planning Department's CEQA Exemption for 2651-2653 Octavia Street, (Case No. 2018-011022 PRJ)

Please forward to the Board of Supervisors and Environmental Planning this letter of SUPPORT for the owner and project sponsor of 2651-53 Octavia in the Appeal hearing on April 20, 2021.

Dear Board of Supervisors,

I am writing today in support of the owners and proposed project at 2651-53 Octavia Street. I am a San Francisco resident and have lived here for 49 years.

After examining the Symphysis illumination and shade studies, I believe that the Golden Gate Valley Library will not significantly or substantially be harmed by the proposed remodel on the adjacent building.

Specifically, I have the following points:

1) I understand that a CEQA protects historically significant buildings from substantial adverse effects on its character defining features. With the proposed project, I find the illumination and shade differences do not qualify as significant or substantial. The patrons of San Francisco will enjoy the library in the same capacity as it does today.
2) The normal light condition in the library is daylight and electric lights, used in combination during open hours. The difference in illumination between the existing light and the light with the proposed addition is **minimal** at -2% clear sky, -4.2 partly cloudy sky, -1.0% overcast sky.
3) The library has 14 windows that encircle the building, and the only widows that are potentially affected are 3, and those windows are consistently 50% covered by dark grey shades that filter 90% of the natural light.
4) The sun shades on the south facing windows have a greater impact on light than the proposed project would have. These shades can be easily adjusted to suit library patron needs.
5) The solar radiation generation is decreased minimally by the proposed project, -5.8% annually. As well, there are no codes or laws protecting solar panels from development of adjacent properties.

I urge you to deny the appeal and validate the Categorical CEQA Exemption that the San Francisco Environmental Planning Department granted to 2651-53 Octavia. Thank you for your consideration.

Sincerely,

Steve Peletz
peletz@gmail.com
415-772-7777

Email addresses to send letter:

bos.legislation@sfgov.org
kei.zushi@sfgov.org
lisa.lew@sfgov.org
bos-supervisors@sfgov.org
angela.calvillo@sfgov.org

From:	BOS Legislation, (BOS)
To:	gloria@gsmithlaw.com; "jcotecook@aol.com"
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Zushi, Kei (CPC); Rosenberg, Julie (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS)
Subject:	HEARING NOTICE: Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Appeal Hearing April 20, 2021
Date:	Tuesday, April 6, 2021 8:29:00 AM
Attachments:	image001.png

Greetings,

The Office of the Clerk of the Board has scheduled a remote hearing for Special Order before the Board of Supervisors on **April 20, 2021, at 3:00 p.m**., to hear an appeal of CEQA Categorical Exemption Determination, for the proposed 2651-2653 Octavia Street project.

Please find the following link to the hearing notice for the matter:

Public Hearing Notice - April 6, 2021

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 210275

Regards,

Lisa Lew
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.
Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services.

Click here to complete a Board of Supervisors Customer Service Satisfaction form

The Legislative Research Center provides 24-hour access to Board of Supervisors legislation, and archived matters since August 1998.

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689
Tel. No. (415) 554-5184
Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

NOTICE OF PUBLIC HEARING

BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO
Sent via Email and/or U.S. Postal Service

NOTICE IS HEREBY GIVEN THAT the Board of Supervisors of the City and County of San Francisco will hold a remote public hearing to consider the following appeal and said public hearing will be held as follows, at which time all interested parties may attend and be heard:

Date: **Tuesday, April 20, 2021**

Time: **3:00 p.m.**

Location: **REMOTE MEETING VIA VIDEOCONFERENCE**
Watch: www.sfgovtv.org

Watch: **SF Cable Channel 26, 78 or 99 *(depending on your provider)* once the meeting starts, the telephone number and Meeting ID will be displayed on the screen.**

Public Comment Call-In: https://sfbos.org/remote-meeting-call

Subject: **File No. 210275.** Hearing of persons interested in or objecting to the determination of exemption from environmental review under the California Environmental Quality Act issued as a Categorical Exemption by the Planning Department on January 27, 2021, for the proposed project at 2651-2653 Octavia Street, Assessor's Parcel Block No. 0554, Lot No. 002 for construction of a fourth floor vertical and a horizontal rear addition that incorporates decks at the step backs to an existing three-story, two-family home within a RH-2 (Residential-House, Two Family) Zoning District and 40-X Height and Bulk District. (District 2) (Appellant: Gloria D. Smith of The Law Offices of Gloria D. Smith, on behalf of GGV Library Friends) (Filed March 5, 2021)

DATED ~ MAILED ~ EMAILED ~ POSTED: April 6, 2021

On March 17, 2020, the Board of Supervisors authorized their Board and Committee meetings to convene remotely and allow for remote public comment due to the Coronavirus -19 pandemic. Therefore, Board of Supervisors meetings that are held through videoconferencing will allow remote public comment. Visit the SFGovTV website (www.sfgovtv.org) to stream the live meetings or watch them on demand.

PUBLIC COMMENT CALL-IN
WATCH: SF Cable Channel 26, 78 or 99 *(depending on your provider)* once the meeting starts, the telephone number and Meeting ID will be displayed on the screen; or
VISIT: https://sfbos.org/remote-meeting-call

Please visit the Board's website (https://sfbos.org/city-board-response-covid-19) regularly to be updated on the City's response to COVID-19 and how the legislative process may be impacted.

In accordance with Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on this matter may submit written comments prior to the time the hearing begins. These comments will be made as part of the official public record in this matter and shall be brought to the attention of the Board of Supervisors. Written comments should be addressed to Angela Calvillo, Clerk of the Board, City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA, 94102 or sent via email (board.of.supervisors@sfgov.org). Information relating to this matter is available in the Office of the Clerk of the Board or the Board of Supervisors' Legislative Research Center (https://sfbos.org/legislative-research-center-lrc). Agenda information relating to this matter will be available for public review on Friday, April 16, 2021.

For any questions about this hearing, please contact one of the Legislative Clerks:

Lisa Lew (lisa.lew@sfgov.org ~ (415) 554-7718)
Jocelyn Wong (jocelyn.wong@sfgov.org ~ (415) 554-7702)

Please Note: *The Department is open for business, but employees are working from home. Please allow 48 hours for us to return your call or email.*

Angela Calvillo
Clerk of the Board of Supervisors
City and County of San Francisco

ll:jw:ams

DATED ~ MAILED ~ EMAILED ~ POSTED: April 6, 2021

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. (415) 554-5184
Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

PROOF OF MAILING

Legislative File No. 210275

Description of Items: Hearing - Appeal of Determination of Environmental Exemption - 2651-2653 Octavia Street - 1 Notice Mailed

I, Richard Lagunte , an employee of the City and County of San Francisco, mailed the above described document(s) by depositing the sealed items with the United States Postal Service (USPS) with the postage fully prepaid as follows:

Date: April 5, 2021

Time: 9:00 a.m.

USPS Location: Repro Pick-up Box in Building Management's Office (Rm 8)

Mailbox/Mailslot Pick-Up Times (if applicable): N/A

Signature: Richard Lagunte

Instructions: Upon completion, original must be filed in the above referenced file.

From:	BOS Legislation, (BOS)
To:	Ko, Yvonne (CPC); Yeung, Tony (CPC)
Cc:	BOS-Operations; BOS Legislation, (BOS)
Subject:	APPEAL FILING FEE PICK-UP: Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Appeal Hearing April 20, 2021
Date:	Friday, March 12, 2021 3:05:15 PM
Attachments:	image001.png Appeal Check Pickup.doc

Hi Yvonne,

The check for the appeal filing fee for the CEQA Exemption Determination appeal of the proposed 2651-2653 Octavia Street project, is ready to be picked up at the Clerk's Office. Please coordinate with our Operations team, copied here, to set up a date and time for pick up. A fee waiver was not filed with project.

Ops,
Check No. 4783 should be in your possession currently. Please have Planning sign the attached pick up form and scan it to leg clerks when completed.

Thank you.
Lisa Lew
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

From: BOS Legislation, (BOS) <bos.legislation@sfgov.org>
Sent: Friday, March 12, 2021 2:45 PM
To: gloria@gsmithlaw.com
Cc: PEARSON, ANNE (CAT) <Anne.Pearson@sfcityatty.org>; STACY, KATE (CAT) <Kate.Stacy@sfcityatty.org>; JENSEN, KRISTEN (CAT) <Kristen.Jensen@sfcityatty.org>; RUIZ-ESQUIDE, ANDREA (CAT) <Andrea.Ruiz-Esquide@sfcityatty.org>; Hillis, Rich (CPC)

<rich.hillis@sfgov.org>; Teague, Corey (CPC) <corey.teague@sfgov.org>; Sanchez, Scott (CPC) <scott.sanchez@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Jain, Devyani (CPC) <devyani.jain@sfgov.org>; Navarrete, Joy (CPC) <joy.navarrete@sfgov.org>; Lewis, Don (CPC) <don.lewis@sfgov.org>; Varat, Adam (CPC) <adam.varat@sfgov.org>; Sider, Dan (CPC) <dan.sider@sfgov.org>; Starr, Aaron (CPC) <aaron.starr@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Zushi, Kei (CPC) <kei.zushi@sfgov.org>; Rosenberg, Julie (BOA) <julie.rosenberg@sfgov.org>; Longaway, Alec (BOA) <alec.longaway@sfgov.org>; BOS-Supervisors <bos-supervisors@sfgov.org>; BOS-Legislative Aides <bos-legislative_aides@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Somera, Alisa (BOS) <alisa.somera@sfgov.org>; Mchugh, Eileen (BOS) <eileen.e.mchugh@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>
Subject: Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Appeal Hearing April 20, 2021

Greetings,

The Office of the Clerk of the Board has scheduled for a remote hearing Special Order before the Board of Supervisors on April 20, 2021, at 3:00 p.m. Please find linked below an appeal letter regarding the proposed 2651-2653 Octavia Street project, as well as direct links to the Planning Department's timely filing determination, and an informational letter from the Clerk of the Board.

Appeal Letter - March 5, 2021
Planning Department Memo - March 10, 2021
Clerk of the Board Letter - March 11, 2021

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 210275

Regards,

Lisa Lew
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.

BOARD of SUPERVISORS

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Tel. No. (415) 554-5184
Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

March 15, 2021

File No. 210275
Planning Case No. 2018-011022ENV

Received from the Board of Supervisors Clerk's Office one check, one in the amount of Six Hundred Sixty Five Dollars ($665) the filing fee paid by the Maureen Holt for the appeal of the Categorical Exemption Determination under CEQA for the proposed 2651-2653 Octavia Street project:

Planning Department By:

Tony Yeung
Print Name

3/16/21
Signature and Date

From:	BOS Legislation, (BOS)
To:	gloria@gsmithlaw.com
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Zushi, Kei (CPC); Rosenberg, Julie (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS)
Subject:	Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Appeal Hearing April 20, 2021
Date:	Friday, March 12, 2021 2:44:34 PM
Attachments:	image001.png

Greetings,

The Office of the Clerk of the Board has scheduled for a remote hearing Special Order before the Board of Supervisors on April 20, 2021, at 3:00 p.m. Please find linked below an appeal letter regarding the proposed 2651-2653 Octavia Street project, as well as direct links to the Planning Department's timely filing determination, and an informational letter from the Clerk of the Board.

Appeal Letter - March 5, 2021
Planning Department Memo - March 10, 2021
Clerk of the Board Letter - March 11, 2021

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 210275

Regards,

Lisa Lew
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.
Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services.

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TDD/TTY No. (415) 554-5227

March 11, 2021

Gloria D. Smith
The Law Offices of Gloria D. Smith
48 Rosemont Place
San Francisco, CA 94103

Subject: **File No. 210275 - Appeal of California Environmental Quality Act (CEQA) Determination of Exemption from Environmental Review - Proposed 2651-2653 Octavia Street Project**

Dear Ms. Smith:

The Office of the Clerk of the Board is in receipt of a memorandum dated March 10, 2021, from the Planning Department regarding their determination on the timely filing of appeal of the Exemption Determination issued by the Planning Department under CEQA for the proposed 2651-2653 Octavia Street project.

The Planning Department has determined that the appeal was filed in a timely manner (copy attached).

Pursuant to Administrative Code, Section 31.16, a remote hearing date has been scheduled for **Tuesday, April 20, 2021, at 3:00 p.m.**, at the Board of Supervisors meeting.

Please provide to the Clerk's Office by noon:

20 days prior to the hearing: *Wednesday, March 31, 2021*	names and addresses of interested parties to be notified of the hearing, in spreadsheet format; and
11 days prior to the hearing: *Friday, April 9, 2021*	any documentation which you may want available to the Board members prior to the hearing.

For the above, the Clerk's office requests electronic files be sent to bos.legislation@sfgov.org.

If you have any questions, please feel free to contact Legislative Clerks Lisa Lew at (415) 554-7718, Jocelyn Wong at (415) 554-7702, or Brent Jalipa at (415) 554-7712.

Very truly yours,

Angela Calvillo
Clerk of the Board

ll:jw:ams

c: Anne Pearson, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Kristen Jensen, Deputy City Attorney
Andrea Ruiz-Esquide, Deputy City Attorney
Rich Hillis, Director, Planning Department
Corey Teague, Zoning Administrator, Planning Department
Scott Sanchez, Acting Deputy Zoning Administrator, Planning Department
Lisa Gibson, Environmental Review Officer, Planning Department
Devyani Jain, Deputy Environmental Review Officer, Planning Department
Joy Navarette, Environmental Planning, Planning Department
Don Lewis, Environmental Planning, Planning Department
Adam Varat, Acting Director of Citywide Planning, Planning Department
Dan Sider, Director of Executive Programs, Planning Department
Aaron Starr, Manager of Legislative Affairs, Planning Department
Jonas Ionin, Planning Commission Secretary, Planning Department
Kei Zushi, Staff Contact, Planning Department
Julie Rosenberg, Executive Director, Board of Appeals
Alec Longaway, Legal Process Clerk, Board of Appeals

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

Categorical Exemption Appeal Timeliness Determination

Date: March 10, 2021
To: Angela Calvillo, Clerk of the Board of Supervisors
From: Lisa Gibson, Environmental Review Officer – (628) 652-7571

RE: **Appeal Timeliness Determination – 2651-2653 Octavia Street Categorical Exemption**
Planning Department Case No. 2018-011022ENV

On March 5, 2021, Gloria D. Smith (Appellant), on behalf of GGV Library Friends, filed an appeal with the Office of the Clerk of the Board of Supervisors of the Categorical Exemption for the proposed project at 2651-2653 Octavia Street. As explained below, the appeal is timely.

Date of Approval Action	30 Days after Approval Action	Appeal Deadline (Must Be Day Clerk of Board's Office Is Open)	Date of Appeal Filing	Timely?
Thursday, February 4, 2021	Saturday, March 6, 2021	Monday, March 8, 2021	Friday, March 5, 2021	Yes

Approval Action: On January 27, 2021, the Planning Department issued a Categorical Exemption for the proposed project. The Approval Action for the project was the Planning Commission's discretionary review decision, which occurred on February 4, 2021 (Date of the Approval Action).

Appeal Deadline: Sections 31.16(a) and (e) of the San Francisco Administrative Code state that any person or entity may appeal an exemption determination (including a CPE) to the Board of Supervisors during the time period beginning with the date of the exemption determination (including a CPE) and ending 30 days after the Date of the Approval Action. The 30th day after the Date of the Approval Action was Saturday, March 6, 2021. The next day when the Office of the Clerk of the Board of Supervisors was open was Monday, March 8, 2021 (Appeal Deadline).

Appeal Filing and Timeliness: The Appellant filed the appeal of the exemption determination on Friday, March 5, 2021, prior to the end of the Appeal Deadline. Therefore, the appeal is timely.

From:	BOS Legislation, (BOS)
To:	Hillis, Rich (CPC)
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Zushi, Kei (CPC); Rosenberg, Julie (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); BOS Legislation, (BOS)
Subject:	Appeal of CEQA Exemption Determination - Proposed 2651-2653 Octavia Street Project - Timeliness Determination
Date:	Monday, March 8, 2021 3:51:30 PM
Attachments:	Appeal Ltr 030521.pdf COB Ltr 030821.pdf image001.png

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Dear Director Hillis,

The Office of the Clerk of the Board is in receipt of an appeal of the Exemption Determination for the proposed 2651-2653 Octavia Street project. The appeal was filed by Gloria D. Smith of the Law Offices of Gloria D. Smith, on behalf of the GGV Library Friends.

Please find the attached letter of appeal and timely filing determination request letter from the Clerk of the Board. Kindly review for timely filing determination. Thank you.

Best,

Lisa Lew
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

BOARD of SUPERVISORS

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Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

March 8, 2021

To: Rich Hillis
Planning Director

From: Angela Calvillo
Clerk of the Board of Supervisors

Subject: Appeal of California Environmental Quality Act (CEQA) Determination of Exemption from Environmental Review - 2651-2653 Octavia Street

An appeal of the CEQA Determination of Exemption from Environmental Review for the proposed 2651-2653 Octavia Street project was filed with the Office of the Clerk of the Board on March 5, 2021, by Gloria D. Smith of The Law Offices of Gloria D. Smith, on behalf of GGV Library Friends.

Pursuant to Administrative Code, Chapter 31.16, I am forwarding this appeal, with attached documents, to the Planning Department to determine if the appeal has been filed in a timely manner.

If you have any questions, please feel free to contact Legislative Clerks Lisa Lew at (415) 554-7718, Jocelyn Wong at (415) 554-7702 or Brent Jalipa at (415) 554-7712.

c: Anne Pearson, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Kristen Jensen, Deputy City Attorney
Andrea Ruiz-Esquide, Deputy City Attorney
Corey Teague, Zoning Administrator, Planning Department
Scott Sanchez, Acting Deputy Zoning Administrator, Planning Department
Lisa Gibson, Environmental Review Officer, Planning Department
Devyani Jain, Deputy Environmental Review Officer, Planning Department
Joy Navarette, Environmental Planning, Planning Department
Don Lewis, Environmental Planning, Planning Department
Adam Varat, Acting Director of Citywide Planning, Planning Department
Dan Sider, Director of Executive Programs, Planning Department
Aaron Starr, Manager of Legislative Affairs, Planning Department
Jonas Ionin, Planning Commission Secretary, Planning Department
Kei Zushi, Staff Contact, Planning Department
Julie Rosenberg, Executive Director, Board of Appeals
Alec Longaway, Legal Process Clerk, Board of Appeals

ll:jw:ams

Print Form

Introduction Form

By a Member of the Board of Supervisors or the Mayor

Time stamp
or meeting date

I hereby submit the following item for introduction (select only one):

☐ 1. For reference to Committee. (An Ordinance, Resolution, Motion, or Charter Amendment)

☐ 2. Request for next printed agenda Without Reference to Committee.

☒ 3. Request for hearing on a subject matter at Committee.

☐ 4. Request for letter beginning "Supervisor _____ inquires"

☐ 5. City Attorney request.

☐ 6. Call File No. _____ from Committee.

☐ 7. Budget Analyst request (attach written motion).

☐ 8. Substitute Legislation File No. _____

☐ 9. Reactivate File No. _____

☐ 10. Question(s) submitted for Mayoral Appearance before the BOS on _____

Please check the appropriate boxes. The proposed legislation should be forwarded to the following:

☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission

☐ Planning Commission ☐ Building Inspection Commission

Note: For the Imperative Agenda (a resolution not on the printed agenda), use a Imperative Form.

Sponsor(s):

Clerk of the Board

Subject:

Hearing - Appeal of Determination of Exemption From Environmental Review - Proposed 2651-2653 Octavia Street Project

The text is listed below or attached:

Hearing of persons interested in or objecting to the determination of exemption from environmental review under the California Environmental Quality Act issued as a Categorical Exemption by the Planning Department on February 4, 2021, for the proposed project at 2651-2653 Octavia Street, Assessor's Parcel Block No. 0554, Lot No. 002 for construction of a fourth floor vertical and a horizontal rear addition that incorporates decks at the step backs to an existing three-story, two-family home within a RH-2 (Residential-House, Two Family) Zoning District and 40-X Height and Bulk District. (District 2) (Appellant: Gloria D. Smith of The Law Offices of Gloria D. Smith, on behalf of GGV Library Friends) (Filed March 5, 2021)

Signature of Sponsoring Supervisor: _____

For Clerk's Use Only: