



BAYVIEW HUNTERS POINT MOTHERS AND FATHERS COMMITTEE



SPEAK SUNSET PARKSIDE EDUCATION & ACTION COMMITTEE



Golden Gate Park Preservation Alliance



SF Ocean Edge
Where Golden Gate Park meets Ocean Beach . . .

August 18, 2020

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Pl. Rm. 244
San Francisco, CA 94102

Re: **OPPOSE** 2020-00052PCA, Standard Environmental Requirements, Code Amendments
AND Call for strengthening of the CEQA process in San Francisco

Dear Supervisors,

The undersigned organizations and individuals write to voice our strong opposition to Planning staff's proposed Standard Environmental Requirements and Code Amendments (SER proposals). These proposed changes, in the guise of 'streamlining' and 'standardizing' development approvals, instead unacceptably and dangerously create huge legal loopholes that allow the waiving of environmental review under the California Environmental Quality Act (CEQA). We urge you to strongly oppose these SER proposals, and furthermore, we urge the City to institute changes to the current CEQA review process in San Francisco, to establish more transparency and democratic participation for local residents.

It should be noted that we the signers, while representing organizations and views that are highly diverse and often not in alignment, on *this* issue of the vital need to maintain and strengthen our community CEQA protections, we are resolute and unified in this communication to you.

Fifty years ago, California adopted CEQA as a vital tool in reducing impacts to the environment, maintaining neighborhood integrity, reducing transportation congestion, and safeguarding historic landmarks. We support the City mandating the most environmentally friendly equipment and methods for projects in San Francisco, but this must be done without damaging the people's right to a fair CEQA process. CEQA must never be weakened or waived in order to simply speed up project approvals.

During these times when the Trump Administration in Washington DC is so easily and callously sweeping aside environmental review and environmental protections in order to streamline corporate profits, San Francisco should be strengthening its environmental protections, not weakening them.

The SER proposals would give City planners sweeping powers over project approvals.

Under the guise of establishing ‘Standard Requirements’ these unacceptable proposals would give City planners sweeping powers to declare projects Categorically Exempt from environmental review, behind closed doors, without any public hearings, based on their own subjective discretion. The proposals:

- **Would enable the SF Planning Department and Planning Commission to unilaterally and arbitrarily make up any exemptions to environmental review they wish, with no required hearings or approval by the Board of Supervisors.** Decisions on what is categorically exempt and what environmental mitigations are required for projects, would be decided solely by the Planning Department and Commission with no input from the Board of Supervisors. The proposed ordinance would even allow Planning to make up new rules to *change* current environmental exemption and mitigation requirements. Over time this could result in completely out-of-control environmental rules, continuously changed on a whim by planners, with no democratic oversight by elected officials whatsoever.
- **Would cut the public and the elected Board of Supervisors out of the environmental appeals process.** Because there is now a more quickly triggered and shorter time period for appealing Categorical Exemptions to the Board, and Categorical Exemptions do not require hearings at the Planning Commission (and, as stated above, under the proposed ordinance exemptions for any project could just be made up arbitrarily) planners would be able to fly far more projects quickly under the radar, with the public far less likely to be aware of them. This would decimate the ability of the public to find out about and appeal harmful projects.
- **Are a disrespectful repeat of previous such attempts by Planning staff to weaken San Francisco’s environmental protections.** In 2006, 2010, and 2012 Planning staff put forward very similar proposals to allow themselves to waive CEQA protections and fly projects under the radar without democratic and environmental scrutiny. Each time, the public and the Board of Supervisors said “No!” and rejected these attempts. Enough is enough. Planning staff should not be allowed to come back over and over again every few years, with the same failed undemocratic proposals, hoping that a new set of Supervisors will somehow not understand the importance of CEQA to environmental protection, and to the democratic process for San Franciscans.

CEQA in San Francisco needs to be strengthened, not weakened.

For example, there needs to be a more robust process for informing the public of the numerous Categorical Exemptions that are issued each year by Planning staff.

- **Appeal Deadlines:** Because Categorical Exemptions require no public hearings, with community questions answered, many projects lack adequate public information at the time that a Categorical Exemption is issued. To give the public adequate time to learn about a project, and if desired file an effective appeal, the length of time for an appeal of a Categorical Exemption should be extended from the current 30 days to 60 days.
- **Public Notice:** So that they are clearly announced to the public, in addition to other noticing requirements, Categorical Exemptions, as they are issued, should be publicly and prominently listed in the agenda for the next public meeting of the Planning Commission, with a sentence describing for each exemption why it was issued.

We are eager to work with the Department to further explore these and other possibilities toward making the CEQA process more effective for the environment and for the residents of San Francisco.

Conclusion

Because these SER proposals allow Planning staff to outright gut our precious CEQA environmental and appeal protections, and are an unwarranted revisiting of previous such proposals that San Franciscans and public officials have clearly and repeatedly rejected, we strongly urge you to OPPOSE them.

We also urge you to strengthen the CEQA process in San Francisco, so past abuses will be prevented and the people of San Francisco may enjoy their right to a full and transparent environmental review process.

Sincerely,

Organizations

Sierra Club San Francisco Land Use Coalition Greenaction for Health and Environmental Justice
PODER San Francisco Green Party Bayview Hunters Point Mothers and Fathers Committee
San Francisco Tenants Union India Basin Neighborhood Association Media Alliance
Golden Gate Park Preservation Alliance SPEAK: Sunset Parkside Education & Action Committee
Outlands Planning Council SF Ocean Edge Friends of the Music Concourse Dance Mission
Our City SF D4ward

Individuals

Judge Quentin Kopp, former State Senator, former Supervisor, SF Board of Supervisors
George Wooding, President Emeritus, Coalition for San Francisco Neighborhoods, District 7
Dennis Antenore, former SF Planning Commissioner; founder, Friends of City Planning, District 5
Nancy Wuerfel, former member Parks, Recreation, & Open Space Advisory Committee (PROSAC) District 4
Tes Welborn, President, Haight Ashbury Neighborhood Council (HANC)
Mike Murphy, Director, San Francisco Watershed Protection Alliance, District 4
Stewart Morton, founding Board member of SF Heritage, former member SF Landmarks Preservation Advisory Board, former Chair Preservation Consortium, District 3
Amy Meyer, District 1 Aaron Goodman, AIA Aleta Beaupied Anastasia Yovanopoulos
Anne MacKenzie, District 2 Arthur Feinstein Barbara Delaney, District 4 Bradley Angel
Bradley Wiedmaier Caroline Kleinman Carolyn Constantino, District 5 Cira Curri
Courtney Clarkson, District 2 Dan Richman, District 8 David Romano, District 1
Denise Zietlow, District 5 Diane Janakes- Zasada, District 1 Diane Smith, District 10

Donald Andreini Dr. Devorah Joseph, Friends of Cabrillo Playground, D-1

Eileen Boken, President, SPEAK, District 4 Eric Brooks, District 6 Erica Zweig, District 4

Erin Farrell, District 10 Georgia Schuttish, District 8 Greg Miller, District 4

Howard Wong AIA, District 3 Inge S. Horton, District 4 J. Barry Gurdin, Phd

Jeff Rigo, District 4 Jim Connelly, District 2 Jody Williams, District 2 Katherine Howard, District 4

Katherine Petrin, Architectural Historian, District 3 Kelly Nice, District 2 Ken Wong, District 1

Larry Delaney, District 4 Letitia Yang, District 2 Libbie Reilly, District 2 Linda Weiner, District 9

Maureen Holt, District 2 Melissa Baer, District 4 Nurit Baruch, District 5 Ozzie Rohm, SFLUC

Paul Guermonprez, District 2 Paul Simpson Piper Connelly, District 2 Rita J. Jeremy, Ph.D.

Shawna McDonald, District 4 Stephen Haigh Steve Ward, 3rd gen SF, La Playa Pk Village (Outer Sunset)

Tom Zimmeroff William Triebe, District 5

Other Opposition Letters (attached)

- Coalition for San Francisco Neighborhoods: Resolution to OPPOSE the proposed SER Ordinance
- San Francisco Preservation Consortium: Letter in opposition to the proposed SER ordinance
- Northern California District Council of Laborers SER opposition letter
- San Francisco Electrical Construction Industry SER opposition letter
- United Food & Commercial Workers Union (UFCW) Local 5 SER opposition letter
- Sierra Club SER opposition letter