

Carol L. Karp
Architect A.I.A.

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C&CSF Planning Commission
Rich Hillis, President
Commission Chambers, City Hall, Room 400
San Francisco, CA 94102

Subject: Appeal of CEQA Categorical Exemption (Resubmitted 6/22/18)
Proposed Contiguous & Interference Construction
2417 Green Street Project [Block 560 - Lot 028]

RE: Coxhead House, 2421 Green Street
Planned Significant Impact to Historic Architectural Resource

Dear President Hollis & Commission Members:

On 1/9/18 the Board of Supervisors granted appeal of the CEQA Categorical Exemption issued 5/16/17 allowing intrusive excavation to undermine foundations and enlarging superstructure to block windows, and returned the project to Planning for proper environmental review (still circumvented). Substantial evidence was submitted to the Board attesting to the significant adverse impact and irreparable harm from the project, if implemented, would cause to Ernest Albert Coxhead's own residence, designed and built 1892-1893. Included was my report of 12/30/17 (*attached*) summarizing the National Register.

I was co-author (with Kathryn Shaffer AIA) of the nomination of the Coxhead House to the National Park Service's placement in the National Register of Historic Places, full document submitted to the SF Planning Department 11/17/17, including Nancy Pelosi's letter. The Coxhead House's qualification for inclusion in the Register has its architecture as its basis; that architecture consists of the appearance of the building, its site and environment, and its history. CEQA, 14 Cal Code Regs §15300.2(f), does not permit a categorical exemption for an activity that interferes with an historical resource. Obliteration of architectural fenestration and view of the major elevation is severe damage. The project's approval by Planning, resulting in issuance of the current-in-place building permits, is why the Board of Supervisors unanimously granted appeal of the determination of categorical exemption, now wrongfully reinstated.

The Coxhead house is not merely an historical resource; it is a unique architectural resource of the San Francisco Bay Area. Architecture does not begin or stop at the property line; architecture is concerned with the relationships among components with emphasis on their externally visible properties. Site planning is a vital part of architecture because building systems are viewed in context with integration of their surroundings, which in CEQA "E" means "Environmental". Architects are trained and experienced in their profession and if qualified in California they are licensed to practice architecture. The Business & Professions Code defines "qualification" as "licensure". None of the persons in the Planning Department signing the determination of Categorical Exemption, which emphasizes the 2417 project but ignores its environment, is listed with the Department of Consumer Affairs as an architect. Their opinions about the Coxhead House's functional architecture are excuses to avoid the required Environmental Impact Report.

Yours truly,



Carol L. Karp

