



Laurel Heights Improvement Association of San Francisco, Inc.

October 23, 2018

By E-Mail To: California.Jobs@opr.ca.gov

Governor's Office of Planning and Research

Re: State Clearinghouse No: 2017092053 - 3333 California Street Project
Application for Environmental Leadership Development Project

These comments are submitted based on information from CARB yesterday that the above-described application was not complete, as CARB was still waiting for some information that CARB requested of the applicant.

1. The Project Drawings Submitted with the Application Do Not Show the Proposed New Loading Zones on the Exterior of the Site, and the Analysis of Vehicle Trips Should Include Estimated Vehicle Trips from Drop-Offs and Pick-Ups Including From Transportation Network Companies Such as Uber and Lyft.

The project drawings submitted with the application do not show the new passenger and commercial loading zones proposed for the exterior of the site, which would be used for pick-ups and drop-offs by passenger and commercial vehicles, including transportation network companies such as Uber and Lyft. These passenger loading zones can be expected to be used by employees working at the site as well as residents and visitors.

Attachment A hereto contains the 8-17-2017 plan sheet C2.02, which shows four (4) new proposed passenger loading zones and one (1) new commercial loading zone marked in red on the exterior of the site. Plan sheet L1.01 shows them marked in blue. (See Attachment A)

The August 30, 2018 email from Dan Safier, project manager, states on page 1 that there would be three (3) separate 60-foot-long white passenger loading zones and one (1) 100-foot-long yellow commercial loading zone on California Street and contains a diagram of the locations following the text. (See Attachment B) The diagram shows the passenger loading zones in blue and the commercial loading zone in yellow. It is not clear whether one of the passenger loading zones proposed in the plans submitted to the Planning Department has been eliminated, as the diagram attached to the email does not indicate that it has been submitted to the Planning Department.

It is my understanding from information provided by the Planning Department that San Francisco's Transportation Analysis Zones were based on data collected from the California household travel behavior survey of 2010-2012 and that transportation network trips have substantially increased since that data was collected. Thus, the Transportation Analysis Zone 709 data used by the applicant does not include the amount of vehicle trips that could be expected from the three or four passenger loading zones on the perimeter of the site under current expectations for transportation network trips. This information should be provided and the analysis of project vehicle trips revised, because the configuration of three to four passenger loading zones on the perimeter of the site can reasonably be expected to attract or serve transportation network companies and add a significant amount of traffic trips to the site.

2. **Comparable Projects in a Similar TAZ Zone or Location Type Were Not Analyzed in the Transportation Efficiency Analysis.**

The applicant's Transportation Efficiency analysis does not compare project traffic with comparable development in Zone 709 or a comparable TAZ Zone or area. Page 10 of the Transportation Efficiency analysis acknowledges that the comparable projects used in the analysis were *not* required to "have the same characteristics as the proposed and variant project that would lead to trip reductions, such as an urban location near transit, an infill nature, or a Transit Demand Management (TDM) program." Page 10 of the Transportation Efficiency analysis states that the analysis was not based on comparable projects, as follows:

"To analyze the transportation efficiency of the proposed and variant projects, the projects' vehicle trip generation was examined against that of comparable developments. The comparable project is assumed to be a project with similar land use as the proposed project **but vehicle trip generation that is more typical of national averages**. The comparable development's vehicle trip generation was calculated using the standard **national reference**, the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*. The comparable project has the same land uses and quantities (size/number of units) as the proposed and variant projects, **but may not have the same characteristics as the proposed and variant projects that would lead to trip reductions, such as an urban location near transit, an infill nature, or a Transit Demand Management (TDM) program**.

For the proposed project, the ITE trip rates used to calculate the vehicle trip generation of the comparable development originated from the following land use categories: Multifamily Housing - Mid-Rise (ITE 221), Multifamily Housing - Low-Rise (ITE 220), Shopping Center (ITE 820), Quality Restaurant (ITE 931), Coffee-Donut shop without Drive-Through Window (ITE 936), General Office (ITE 710), and Day Care Center (ITE 565). For the comparable project relating to the variant project, the same land use categories were used, with the exception of the General Office category." (Emphasis

added)

Page 1 of the Transportation Efficiency analysis also states that the proposed and variant projects were “analyzed against the trip generation of a comparable project, **which is based on national average characteristics.**” (Emphasis added)

Since the San Francisco Transportation Information Map contains many, very detailed Transportation Analysis Zones, that would have characteristics comparable to the TAZ 709 location and the proposed and variant projects, the analysis should be revised using comparable development in San Francisco that has “the same characteristics as the proposed and variant projects that would lead to trip reductions, such as an urban location near transit, an infill nature, or a Transit Demand Management (TDM) program.” Since the “comparable” projects used in the Transportation Efficiency analysis were not required to have these characteristics, but were based on national average characteristics, the comparison with the other development overstated the degree by which the proposed and variant projects could result in a decrease in total daily vehicle trips. Public Resources Code section 21180 specifies that comparable projects “must be located on an infill site,” but the Transportation Efficiency analysis did not demonstrate that the compared projects were located on an infill site.

Given the well-known fact that San Francisco is the second most dense city in the nation, the comparison of the proposed and variant projects with projects more typical of national averages resulted in misleading and inaccurate information and failed to provide information sufficient to enable the Governor to determine that the project will achieve at least 15 percent greater transportation efficiency, as defined in Public Resources Code section 21180(c) than comparable projects. The Governor's Guidelines for an AB 900 application specify that for “the purposes of this provision, comparable means a project of the same size, capacity and location type.” The comparison used by the applicant failed to use the same location type consisting of an urban location near transit or an infill nature. The applicant should be required to revise the analysis and compare the proposed and variant projects with a development of the same location type consisting of an urban location near transit or an infill site.

3. The Greenhouse Gas Emissions From Vehicles Expected to Use the Newly Proposed Passenger and Commercial Loading Zones on the Exterior of the Site Should Be Included in the Greenhouse Gas Emissions Analysis.

The Greenhouse Gas Emissions (GHG) Analysis does not appear to include the GHG emissions from vehicles expected to use the new 3 or 4 passenger and 1 commercial loading zones proposed for the exterior of the site. AB 900 clearly requires analysis of all GHG emissions from vehicle traffic associated with the proposed and variant projects. The application should be revised to include these GHG emissions, especially those that could result from employee, resident and visitor transportation to and from the site.

4. All Net Greenhouse Gas Emissions Should Be Evaluated For the Lifespan of the Project.

Public Resources Code section 21183(c) specifies that the project may not result “in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation.” The statute does not limit the GHG emissions to direct emissions from the project. All indirect emissions should also be evaluated, including the GHG emissions that would result from the manufacture of the substantial amounts of concrete and steel that would be used to construct the proposed and variant projects. The project proposes to construct 1,372,270 gross square feet of development on the site, which is almost three times the existing 469,000 gross square footage of development. (See Attachment C, plan sheet G3.02a and excerpt of Initial Study for 3333 California Street Mixed Use Project, p. 9) Substantial amounts of concrete and steel would be needed for construction of underground parking garages, which would entail excavation of soils and rock 7- 40 feet below existing grade, generating approximately 241,300 net cubic yards of excavated soils. (See Attachment C, Initial Study excerpt, p. 207 and plan excerpt G2.08.)

In addition, the application for Environmental Leadership Development Project states under heading 9 that operational emissions were calculated for 2020 through 2057 to account for an approximately 30-year lifespan of the project following buildout. This estimate seems small and should warrant further inquiry and reanalysis of the expected lifespan of the project following buildout. The buildings and garages could certainly be expected to last for more than 30 years. The existing building and garages were first constructed in the mid-1950s.

5. This is Not an Of-Right Project, and Approval of the San Francisco Board of Supervisors Would Be Required for Substantial Zoning Changes to Permit the Proposed and Variant Project to Proceed, So the Determination of Leadership Status Should be Deferred Until After the Board of Supervisors Considers the Proposed and Variant Project and any Alternatives Proposed by Commenters on the EIR.

The application does not disclose the fact that substantial zoning changes would have to be approved by the San Francisco Board of Supervisors to allow the proposed and variant project to proceed. As explained by the San Francisco Planning Department's Preliminary Project Assessment, Attachment D hereto, various aspects of the project conflict with both the current RM-1 zoning applicable to the site, as well as with City Planning Commission Resolution No. 4109, which also applies to the site. (Attachment D, pp. 10, 14) Also, various components of the project exceed the current 40-foot height limit, and a height district reclassification of the property must be sought. *Id.* p. 10; see also Attachment C, Initial Study excerpts pp. 85-87.

In addition, the San Francisco Board of Supervisors has not approved any development

agreement for the site. Thus, the statement under heading 9 of the application that the applicant "may choose to develop the project site over a timeframe of up to 15 years" is inaccurate. Applicant Dan Safier has made clear that he is seeking to enter into a development agreement with the City of San Francisco for a term of approximately 15 years. (Attachment F, excerpt of email from Dan Safier)

There is very substantial community opposition to the rezonings requested by the applicant, and the community has presented a petition with approximately 800 signatures against the rezoning to the Supervisor of District 2. The community is preparing an alternative plan that would contain the same number of housing units as the proposed and variant projects but eliminate the new retail uses and new office building.

The Governor should defer the decision on the AB 900 application until after the San Francisco Board of Supervisors votes on whether to grant zoning changes and whether to approve the nature, size and composition of the project.

6. The Existing Building and Landscaping on the Site are Listed California Historical Resources.

As explained in Attachment E hereto, the existing building and landscaping are historically significant resources listed on the California Register of Historical Resources. Attachment E contains excerpts of the nomination of the site as a historical resource that was granted. These excerpts explain the character defining features of the existing office building and landscaping and that the design was intended to promote the integration of the architecture and landscape.

The proposed and variant project would materially impair character defining features of the resource including the horizontality of massing and the integrated landscaping. (Attachment G, plan sheets A6.00, A6.01 and A1.02)

The community is preparing an alternative that would construct the same number of residential units on the site as the proposed and variant projects but would not materially impair character defining features of the resource.

Conclusion

We appreciate your consideration of these comments and hope you will take them into account in evaluating the application and deciding the appropriate time for a determination of whether the application complies with AB 900 standards.

Governor's Office of Planning and Research
October 23, 2018
Page 6

Very truly yours,

Laurel Heights Improvement Association of SF, Inc.

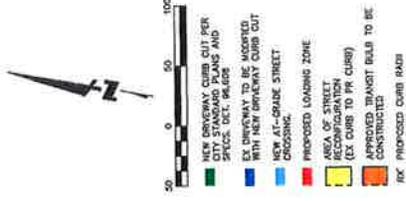
Kathryn R. Devincenzi

By: Kathryn R. Devincenzi, President

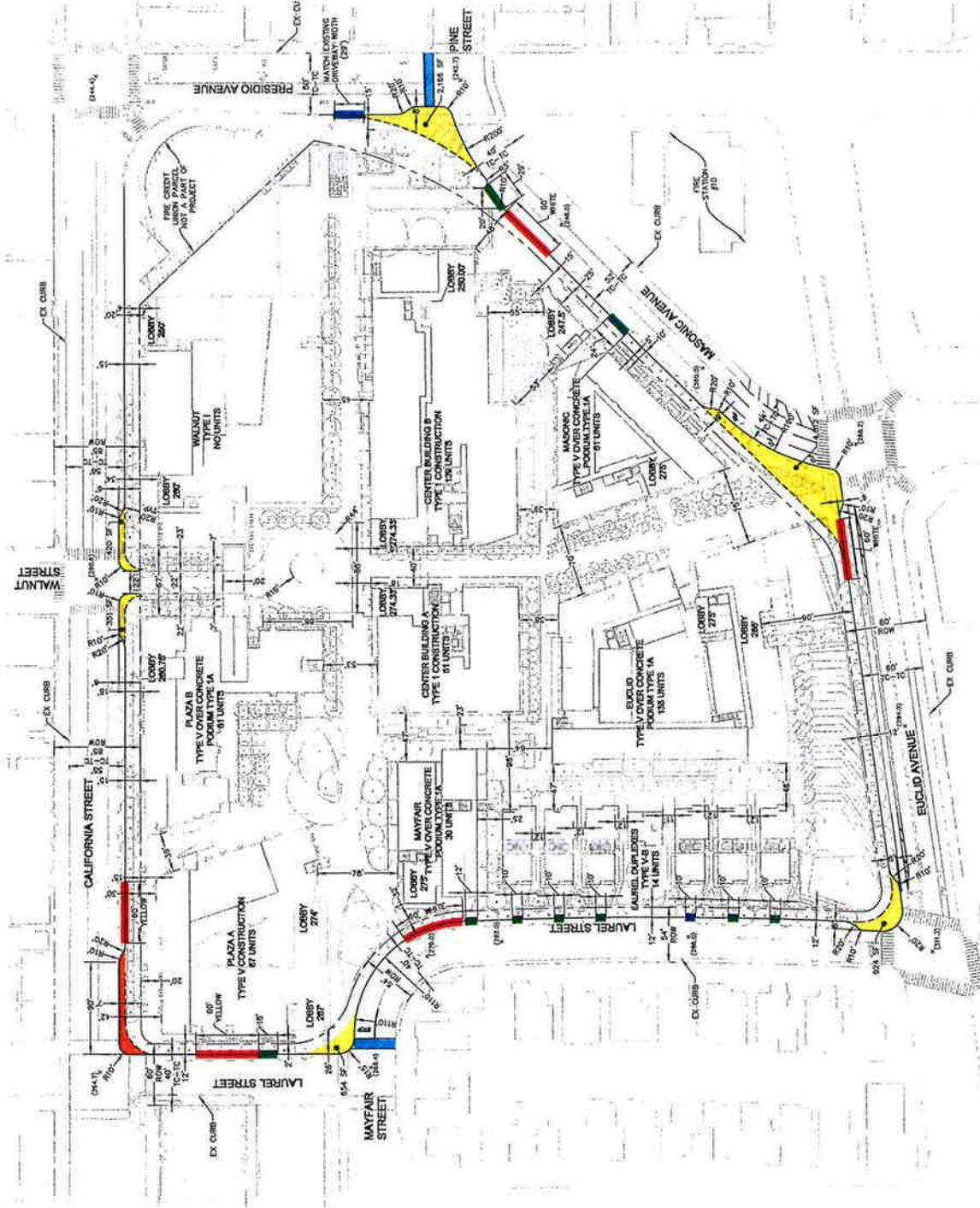
cc: Scott Morgan, Director, State Clearinghouse
Chris Ganson, Senior Planner
Richard Corey, Executive Director CARB
Heather King, Air Pollution Specialist

Attachments: A through G

EXHIBIT A



- NEW DRIVEWAY CURB CUT PER CITY STANDARD PLANS AND SPEC. DET. 94.05
- EX DRIVEWAY TO BE MOVED WITH NEW DRIVEWAY CURB CUT CROSSING
- NEW AT-GRADE STREET
- PROPOSED LOADING ZONE
- AREA OF STREET RECONFIGURATION (EX CURB TO PM CURB)
- APPROVED TRANSIT BULL TO BE CONSIDERED
- EX PROPOSED CURB RAIN



PROPOSED SITE PLAN AND HORIZONTAL CONTROL PLAN

C2.02

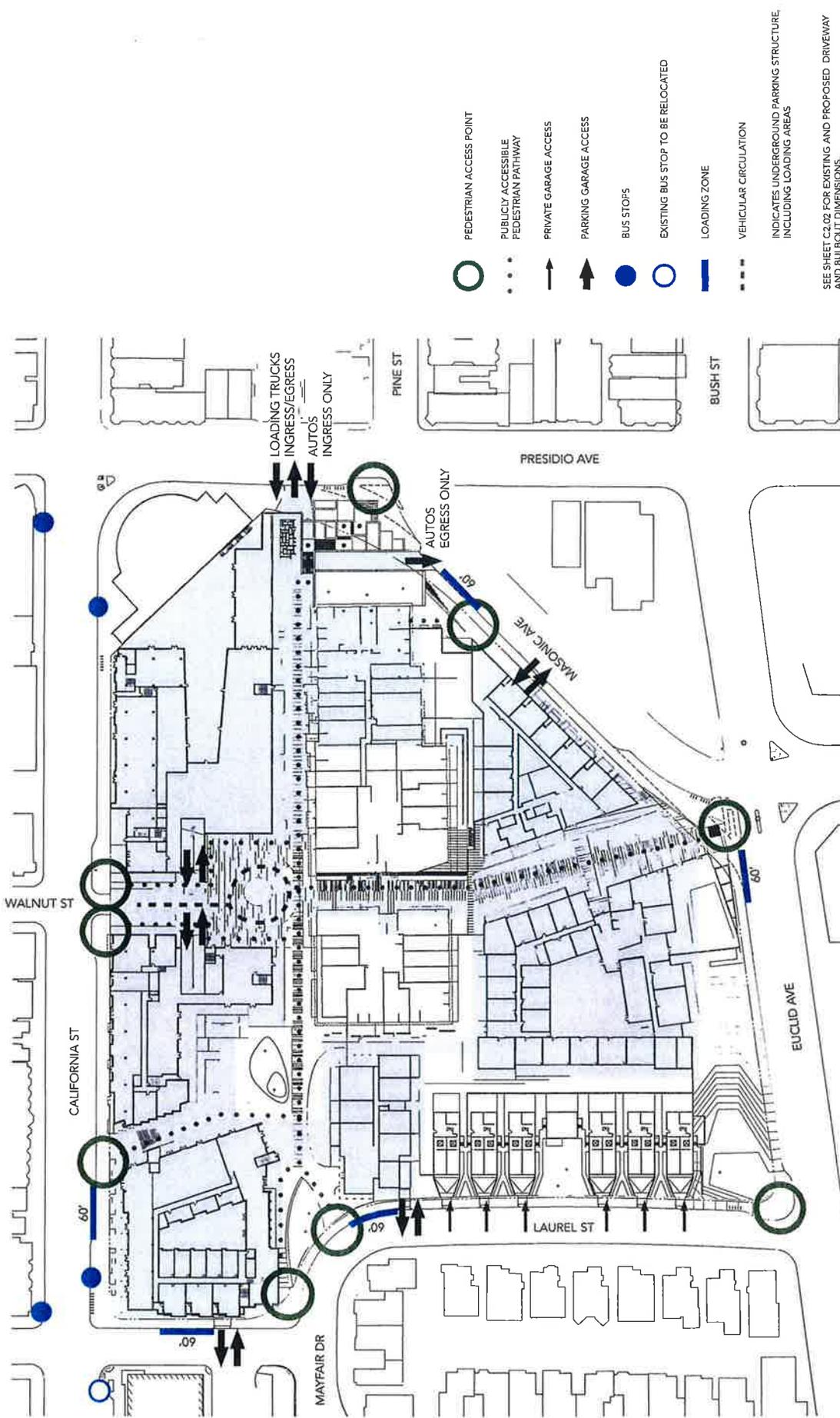
06.17.2017
PLANNING APPLICATION SUBMITTAL

3333 CALIFORNIA STREET SAN FRANCISCO, CA









3333 CALIFORNIA STREET - SITE ACCESS

08.17.2017

PLANNING APPLICATION SUBMITTAL

0 25' 50' 100' 150'



L1.01

3333 CALIFORNIA STREET SAN FRANCISCO, CA



JENSEN

ARUP BAR architects



JAMES CORNER FIELD OPERATIONS

EXHIBIT B

Thank you and Follow-Up

1 message

Dan Safier <dsafier@pradogroup.com>

Thu, Aug 30, 2018 at 11:23 AM

To: "krdevincenzi@gmail.com" <krdevincenzi@gmail.com>, "frfbeagle@gmail.com" <frfbeagle@gmail.com>, "johnrothmann2@yahoo.com" <johnrothmann2@yahoo.com>, "M.J. Thomas" <mjthomas@hill-co.com>
Cc: Dan Kingsley <dkingsley@sksre.com>, Cindy Park <cpark@pradogroup.com>, Don Bragg <dbragg@pradogroup.com>, Jing Ng <Jing@pradogroup.com>

Dear Kathy, Dick, John, and M.J.,

We hope this email finds you well.

Please see attached for our responses to your questions from our previous meeting.

As mentioned at the end of our meeting, we thought the discussion was very productive. As we continue to work on refining the Planning Application, we would like offer to schedule a follow-up meeting to further discuss retail or any other topics.

Sincerely,

Dan and Dan



Dan Safier

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 **2018.08 PSKS Response to LHIA Questions.pdf**
2155K

1. What loading zones are being proposed for the site? What traffic impacts are associated with the locations of the loading zones?

The project is proposing six (6) off-street and underground freight loading spaces in the California Street and Masonic garages.

In addition to this, the project provides three (3) separate 60-foot-long (white) passenger loading zones and one (1) 100-foot-long (yellow) commercial loading zone. Please see the attached diagram which calls out the passenger loading zones in blue and the commercial loading zone in yellow. The zones are currently located as follows:

- West side of Masonic Avenue (passenger)
- North side of Euclid Avenue (passenger)
- East side of Laurel Street (passenger)
- South side of California Street (commercial), as requested by the City's Streetscape Design Advisory Team (SDAT)

The locations of the on-street passenger loading zones were located for pedestrian and residence convenience and proximity to the lobbies of the proposed buildings in the project. Passenger loading would also occur at the proposed roundabout at the terminus of the Walnut Street extension into the project site.

The potential impacts of the loading zones are currently being studied and evaluated in the transportation section of the Draft EIR. Appropriate mitigation and improvement measures will be introduced as necessary.

2. Site Access:

a. Can cars go in and out on California and Walnut?

Yes. As shown in the attached diagram, the project is proposing multiple access points from the surrounding streets into underground parking garages to disperse the access around the site. This includes the entry/exit driveway at California and Walnut for the California Street Garages. The traffic flow is being studied in the Draft EIR.

The proposed access points are listed in detail in the Initial Study, including specifically on pages 57 & 58. This list has not changed since the publication of the Initial Study, with the exception of the consolidation of the Mayfair garage entry/exit and the 6 Laurel Townhome driveways into a single access point, as shared with LHIA at our 7/24 meeting. Please see attached for a diagram of the updated site access plan for the Mayfair Garage and Laurel Townhomes.

b. What are the proposed plans for Presidio Avenue? Is there a vehicular exit on Presidio; if not, can this be added?

The proposed plans for Presidio Avenue are identified in the initial Study, including Pages 58 and 63.

There is a driveway on Presidio that will include an in and out access for the off-street freight loading area and in-only access to the California Street Garage. The current

design enables exiting vehicles to exit via a new curb cut on Masonic Avenue. The entrance and the exit were separated for traffic management purposes. The Draft EIR will analyze the traffic impacts of the project and driveways in depth, studying potential traffic impacts and circulation through the proposed driveways while putting forward mitigation and improvement measures as necessary.

c. The Initial Study states that the Mayfair Garage might be connected to the main underground garage. What effect will this have on the traffic on Laurel?

The Initial Study and DEIR do not currently study the parking garages as connected, which we understand to be the more conservative analysis.

d. Does the proposal include the retention of the café in existing building?

The proposal does not currently include the retention of the café in the existing building.

3. What is your goal for the retail? Is it more of an amenity for the housing or more of a financial driver?

Our approach has always been to add to and complement Laurel Village and Sacramento Street. We aim to work with our community and the Laurel Village Merchants. The retail plan from our June 13, 2017 community meeting shows how we could divide the spaces on California Street to accommodate smaller shops and a range of neighborhood-serving retail.

Neighborhood retail brings pedestrians and the watchful eyes that come with them, enhancing the safety of city streets. It also encourages walkability, with residents walking to stores, services, parks and other amenities close by. As such, we believe the retail will be an amenity to our project and the community.

4. If a SUD were granted, what is the process for amending it? What is the process for amending a DA? Is the public process less involved for the amendments?

Amendments to a SUD are treated as an amendment to the Planning Code and must be done by ordinance of the Board of Supervisors. This is a lengthy process involving multiple public hearings, CEQA review, and is outlined in Section 302 of the Planning Code; the proposed amendments are subject to approval by the Planning Commission and Board of Supervisors. Any material change to the DA (e.g., any modification that would extend the term, change the permitted uses, decrease the community benefits, or be inconsistent with the SUD) would require Planning Director, Planning Commission and Board of Supervisor's approval.

EXHIBIT C

Bldg	Residential Gross SF	Retail Gross SF	Office Gross SF	Childcare Gross SF	Garage Gross SF	TOTAL GSF
Plaza A	66,150	14,178	0	0	64,550	144,878
Plaza B	72,220	11,328	0	0	62,070	145,618
Walnut	0	24,324	49,959	14,650	174,440	283,453
Center Bldg A	89,465	0	0	0	0	89,465
Center Bldg B	233,423	0	0	0	19,258	252,681
Masonic	88,906	0	0	0	35,966	124,892
Euclid	177,345	4,287	0	0	51,991	233,623
Laurel Duplexes	54,111	0	0	0	4,728	58,839
Mayfair	43,071	0	0	0	15,750	58,821
Total	824,691	54,117	49,959	14,650	428,773	1,372,270

PROJECT TOTALS

PROJECT AREAS

Level	JR	1-BED	2-BED	3-BED	4-BED or PH	TOTAL
Plaza A	18	22	23	4	0	67
Plaza B	9	21	25	5	0	61
Walnut	0	0	0	0	0	0
Center Bldg A	0	24	11	10	6	51
Center Bldg B	0	50	51	29	9	139
Masonic	0	27	24	10	0	61
Euclid	0	50	54	31	0	135
Laurel Duplexes	0	0	1	1	12	14
Mayfair	0	14	6	10	0	30
Total	27	208	195	181	27	558
	5%	37%	35%	18%	5%	100%

PROJECT TOTALS

UNIT MIX/COUNT

Bldg	Residential Parking	Retail Parking *	Office Parking	Childcare Parking	Commercial Parking	Total	Car share	Loading Areas
Plaza A	57	43	0	0	0	0	0	0
Plaza B	61	34	0	0	60	0	10	0
Walnut	0	48	100	29	0	0	0	3
Center Bldg A	51	0	0	0	0	0	0	0
Center Bldg B	139	0	0	0	0	0	0	0
Masonic	61	0	0	0	0	0	0	3
Euclid	137	13	0	0	0	0	0	0
Laurel Duplexes	12	0	0	0	0	0	0	0
Mayfair	30	0	0	0	0	0	0	0
Total	558	138	100	29	60	885	10	6

PROJECT TOTALS

BIKE PARKING (SEC. 155): PROVIDED
 REQUIRED CLASS ONE: 358 - COMPLIES
 RES: 100 + 1/4 DU OVER 100 = 215 - COMPLIES
 OFFICE: 1/500 GSF = 64,177/500 = 8 - COMPLIES / EXCEEDS
 CHILDCARE: 1/20 CHILDREN = 172/20 = 9 - COMPLIES

PROVIDED CLASS TWO:
 RES: 1/20 DU = 558/20 = 28 - COMPLIES / EXCEEDS
 OFFICE: 2 REQ'D IF <50,000 GSF
 RETAIL: 10 + 1/10,000 >50K GSF = 10 - COMPLIES
 FOOD/BEV: 1/750 SF = 16,892/750 = 23 - COMPLIES / EXCEEDS
 CHILDCARE: 1/20 CHILDREN = 8

PARKING PROVIDED

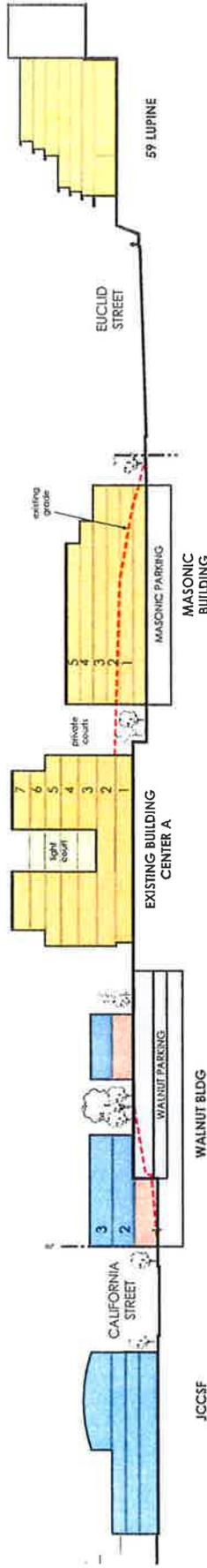
* Plaza A+B retail parked at 3/1000, assumed half of area at 2/1000 "retail general" and half of area 4/1000 "food and beverage"
 * Walnut retail parked at 2/1000, assumed "retail general"
 * Euclid retail parked at 4/1000, assumed to be "food and beverage" and are located in the California Street garage
 * The parking spaces for the Laurel townhomes without a garage are located in the Euclid garage (2)
 * 6 Plaza A Residential spaces are located in the Plaza B parking area

PROJECT DATA - SUMMARY

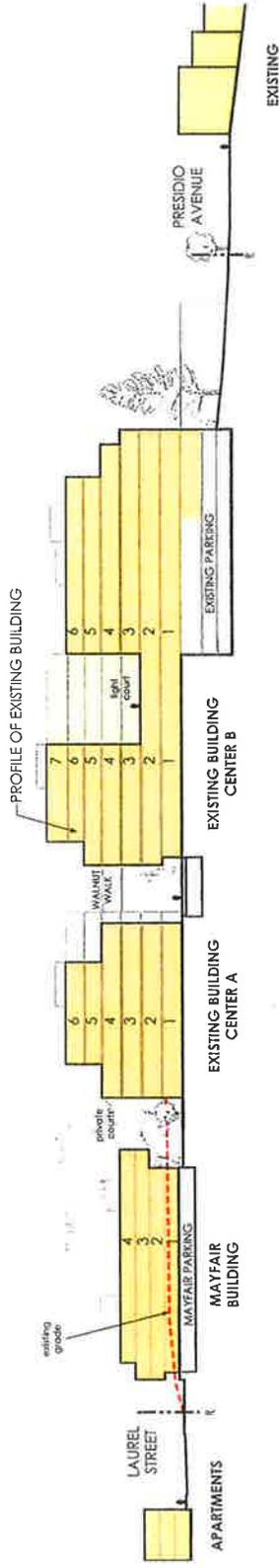
08.17.2017
 PLANNING APPLICATION SUBMITTAL

G3.02a

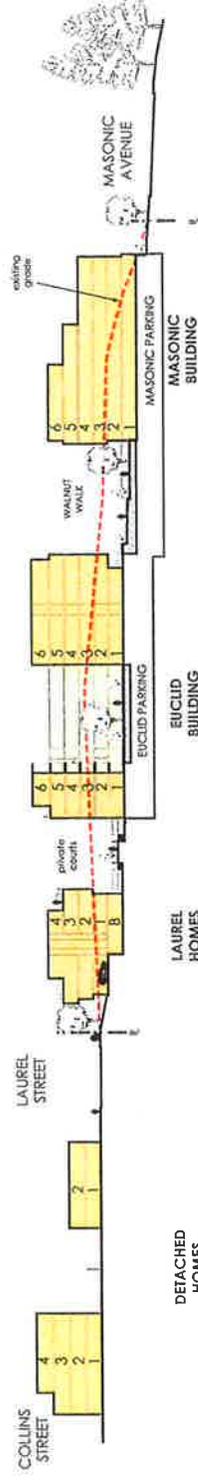
3333 CALIFORNIA STREET SAN FRANCISCO, CA



1 NORTH-SOUTH SITE SECTION
1" = 40'-0"



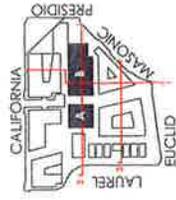
2 EAST-WEST SITE SECTION
1" = 40'-0"



3 EAST-WEST SITE SECTION
1" = 40'-0"

- CHURCH USE
- PARKING
- RETAIL USE
- OFFICE
- RESIDENTIAL HOMES
- LANDSCAPED ROOF
- CONCRETE & G.O.K.
- RETAIL G.O.K.
- OFFICE CODE
- RESIDENTIAL CODE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.



PROJECT SITE SECTIONS



08.17.2017
PLANNING APPLICATION SUBMITTAL



JENSEN

ARUP BAR architects

OPERATIONS



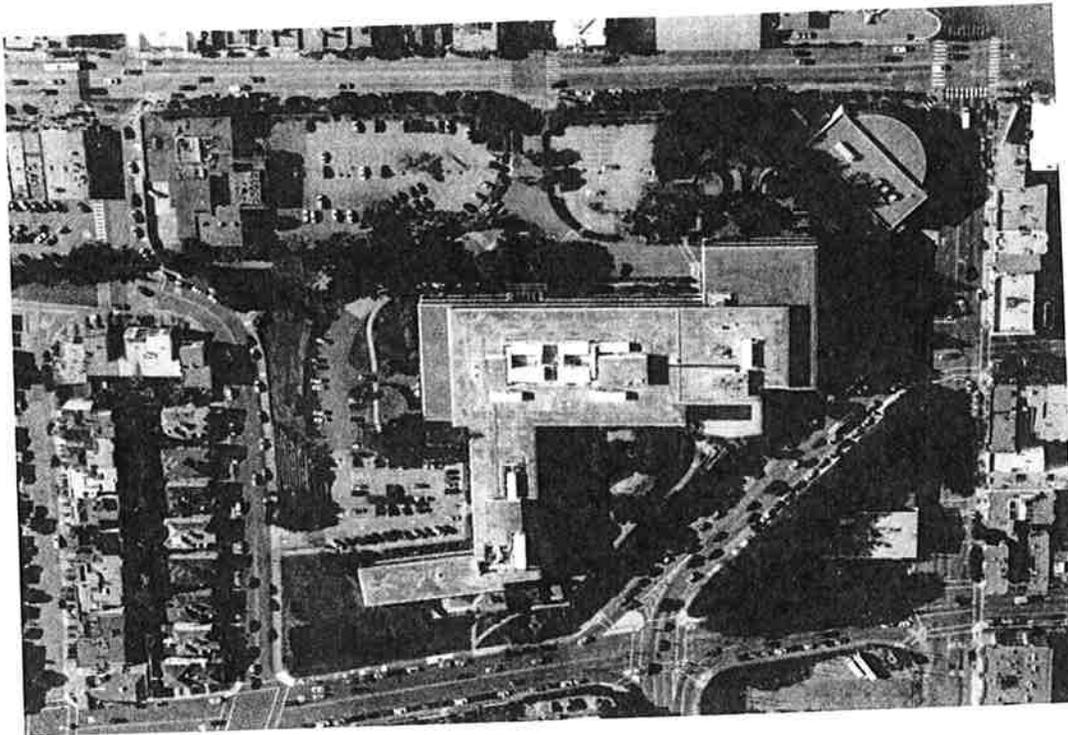
3333 CALIFORNIA STREET SAN FRANCISCO, CA

JAMES CORNER FIELD OPERATIONS

G2.08

Initial Study

3333 California Street Mixed Use Project



Planning Department Case No. 2015-014028ENV
State Clearinghouse No. 2017092053

April 25, 2018

Written comments should be sent to:

Julie Moore
Senior Environmental Planner
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
julie.moore@sfgov.org



SAN FRANCISCO
PLANNING
DEPARTMENT

Use	Existing		Proposed Project	
	Existing Gross Square Footage or Number of Spaces	Location	Proposed Gross Square Footage or Number of Spaces	Proposed Location
On-Street Commercial and Passenger Loading Spaces	0	Not Applicable	4 (conversion of 15 parking spaces)	California Street and Laurel Street (1 commercial space) Masonic Avenue, Euclid Avenue, Laurel Street (3 passenger spaces)
TOTAL GROSS SQUARE FOOTAGE / NUMBER OF SPACES	Existing: 469,000 gsf / 543 spaces		Proposed Project: 1,372,270 gsf / 895 spaces	
<p><i>Notes:</i></p> <p>A With the adaptive reuse of Center Building B, a portion of Basement Level B1 and all of Basement Level B3 under the eastern portion of the existing office building would be retained for parking and integrated with the proposed California Street Garage (under the proposed Plaza A, Plaza B, and Walnut buildings) and, potentially, with the new below-grade parking under the proposed Masonic, Euclid, and Mayfair buildings.</p> <p>B There are five existing car-share spaces in Basement Level B1 of the structured parking garage.</p> <p>C Parking would include 10 car-share spaces and 26 Americans with Disabilities Act accessible spaces. Pursuant to San Francisco Green Building Code sections 4.106.4 and 5.106.5 up to 8 percent of parking spaces would be developed with electric vehicle charging stations and other spaces would be electric vehicle ready.</p> <p>D Open area includes 51,900 square feet of existing privately owned open space. UCSF currently grants public access to the green spaces at the corner of Euclid Avenue and Laurel Street (23,600 square feet) and along Presidio Avenue (10,700 square feet). The internal private open spaces on the south and east sides of the existing office building (a 4,500-square-foot child care play space and a 13,100-square-foot private courtyard) are for UCSF's exclusive use. The remaining approximately 113,300 square feet of open area are inaccessible planted or landscaped areas. Open area does not include existing surface parking lots (approximately 139,000 square feet).</p> <p>E Includes all landscaped areas and common open space and private open space for the proposed residential uses. A portion of the common open space would be open to the public. Private and common open space would be provided for each of the proposed new buildings and the renovated Center A and Center B Buildings as part of the development of each of these buildings and as part of the overall open space framework.</p>				

Source: Laurel Heights Partners, LLC; BAR Architects; SCB; Jensen (August 2017)

The proposed project would amend the San Francisco Planning Code (planning code), adding a new Special Use District (SUD). The SUD would establish land use zoning controls for the project site. The Zoning Maps would be amended to show changes for the project site from the current zoning (Residential, Mixed District, Low Density [RM-1] Zoning District) to the proposed SUD zoning, which would apply. In addition, it would require a waiver or modification of any applicable conditions of Planning Commission Resolution 4109 (Resolution 4109 [described in detail below on pp. 22-23]).¹⁰ Height limits would remain at 40 feet except along California Street, where height limits would be increased from 40 to 45 feet to accommodate higher ceilings for ground-floor retail uses, and at the center of the site (from 40 feet to 80 and 92 feet) for the renovated buildings resulting from the adaptive reuse of the existing office building, which is approximately 55.5 feet tall as measured along the north elevation to the top of the roof (exclusive of the approximately 13-foot-tall mechanical penthouse).

¹⁰ City and County of San Francisco, City Planning Commission Resolution 4109, November 13, 1952.

Overall, 1,476,987 gsf of new and rehabilitated space, comprising 978,611 gsf of residential floor area; 48,593 gsf of ground floor retail spaces; and 14,650 gsf of childcare center space would be developed under the project variant. Up to 971 vehicle parking spaces, including ten car-share spaces, would be provided in multiple garages with up to three subterranean levels totaling 435,133 gsf. Approximately 236,000 square feet of the project site would be retained as open area, including the development of common and private open space throughout the site, the same open space and public access program that would be provided with the proposed project.

Under the project variant the footprints of the other proposed new buildings would not change and the design program would be similar to the one for the proposed project. The preliminary construction phasing plan would also be applicable to the project variant, described in detail on pp. 74-78, with the exception of Phase 3. Under the project variant, Phase 3 would include the development of 153,920 gsf of residential uses (186 units), substituting for 49,999 gsf of office space and 5,524 gsf of retail space in the Walnut Building. Under the project variant, Phase 3 garage space would increase by 6,360 gsf (from 301,060 gsf for the proposed project to 307,420 gsf).

REQUIRED APPROVALS

Implementation of the proposed project or project variant would require changes to existing development controls for the project site through planning code, and zoning map amendments including permitted uses and height and bulk. The project sponsor would seek to create a new Special Use District (SUD) and to modify or waive the requirements of Resolution 4109, which would require a recommendation by the Planning Commission and approval by the Board of Supervisors. The project sponsor would also seek approval of a Conditional Use authorization/Planned Unit Development to permit development of buildings with heights in excess of 50 feet and provide for minor deviations from the provisions for measurement of height, to allow for more residential units than principally permitted in the RM-1 Zoning District, to allow certain planning code exceptions to open space, dwelling unit exposure, rear yard setback requirements, and to allow for commercial uses necessary to serve residents of the immediate vicinity of the RM-1 Zoning District. It is anticipated that the City and the project sponsor would enter into a Development Agreement (which requires approval by the Planning Commission and Board of Supervisors) that, among other terms, could formalize the amount of affordable housing developed as part of the proposed project or project variant, formalize the amount and maintenance of privately owned, common usable open space, and limit the City's ability to rezone the site for a set period of time.

The following is a preliminary list of San Francisco agencies' anticipated approvals for the proposed project and the project variant and is subject to change. These approvals may be reviewed in conjunction with the required environmental review, but may not be granted until after the required environmental review is completed.

Actions by the City Planning Commission

- Certification of Environmental Impact Report (EIR) and adoption of findings under CEQA
- Adoption of Findings of Consistency with the general plan and priority policies of Planning Code section 101.1
- Recommendation to Board of Supervisors to approve planning code and zoning map amendments, approve the Special Use District, and to modify or waive the requirements of Resolution 4109
- Conditional Use/Planned Unit Development authorization to permit development of buildings with height in excess of 50 feet and provide for minor deviations from the provisions for measurement of height, to provide exceptions to open space, dwelling unit exposure, rear yard setback requirements and to allow for commercial uses necessary to serve residents of the immediate vicinity of the RM-1 Zoning District and 40-X Height and Bulk District, and to provide for additional dwelling unit density under the project variant
- Approval of office allocation for up to 49,999 square feet (Planning Code section 321)
- Recommendation to Board of Supervisors to approve Development Agreement
- General plan referral for street vacation/dedication associated with the development of Corner Plaza at Masonic and Euclid avenues and the Pine Street Steps and Plaza at the Masonic/Pine/Presidio intersection; and for sidewalk widening
- Approval of a Transportation Demand Management Plan (Planning Code section 169)

Actions by the San Francisco Board of Supervisors

- Adoption of findings under CEQA
- Adoption of Findings of Consistency with the General Plan and priority policies of Planning Code section 101.1
- Approval of planning code and zoning map amendments, including Special Use District
- Approval of Development Agreement, if applicable
- Approval of street vacation/dedication associated with the development of Corner Plaza at Masonic and Euclid avenues and the Pine Street Steps and Plaza at the Masonic/Pine/Presidio intersection
- Approval of sidewalk widening legislation
- Adoption of resolution to modify or waive Planning Commission Resolution 4109

Actions by Other City Departments

- San Francisco Public Works
 - Approval of Subdivision Map
 - Public hearing and approval of permits to remove and replace street trees on California Street and to remove protected trees on the project site within 10 feet of the public right-of-way
 - Approval of permits for streetscape improvements in the public right-of-way, including new curb cuts on Masonic Avenue (two) and Laurel Street (eight)

- Approval of an encroachment permit for the proposed curb bulb-outs and associated streetscape improvements on the west side of Presidio Avenue at the intersection with Pine Street and Masonic Avenue, on the west side of Masonic Avenue at the intersection with Euclid Avenue, and on the east side of Laurel Street at the intersection with Mayfair Drive
- Approval of a street space permit from the Bureau of Street Use and Mapping if sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s)
- Recommendation to Board of Supervisors to approve legislation for sidewalk widening
- San Francisco Municipal Transportation Agency
 - Approval of request for on-street commercial truck (yellow) and passenger (white) loading zones on Laurel Street, California Street, Masonic Avenue, and Euclid Avenue
 - Approval of a special traffic permit from the Sustainable Streets Division if sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s)
 - Approval of construction within the public right-of-way (e.g., bulbouts and sidewalk extensions) to ensure consistency with the Better Streets Plan
 - Approval of the placement of bicycle racks on the perimeter sidewalks and within the project site
- San Francisco Department of Building Inspection
 - Review and approval of demolition, excavation, and site/building permits
 - Review and approval of construction permit for non-potable water system
 - Approval of a permit for nighttime construction if any night construction work is proposed that would result in noise greater than five dBA above ambient noise levels
 - Review and approval of plumbing plans for non-potable water reuse system per the Non-potable Water Ordinance
- San Francisco Public Utilities Commission
 - Review and approval of Erosion and Sediment Control Plan, in accordance with article 4.1 of the public works code
 - Review and approval of any changes to sewer laterals (connections to the City sewer system)
 - Review and approval of any changes to existing publicly-owned fire hydrants, water service laterals, water meters, and/or water mains
 - Review and approval of the size and location of new fire, standard, and/or irrigation water service laterals
 - Review and approval of post-construction stormwater design guidelines including a Stormwater Control Plan, in accordance with City's 2016 Stormwater Management Requirements and Design Guidelines
 - Review and approval of Landscape Plan per the Water Efficient Irrigation Ordinance

- Approval of the use of dewatering wells per article 12B of the health code (joint approval by the health department)
- Review and approval of documentation for non-potable water reuse system per the Non-potable Water Ordinance
- San Francisco Department of Public Health
 - Review and approval of Site Mitigation Plan, in accordance with San Francisco Health Code article 22A (Maher Ordinance)
 - Review and approval of a Construction Dust Control Plan, in accordance with San Francisco Health Code article 22B (Construction Dust Control Ordinance)
 - Approval of the use of dewatering wells per article 12B of the health code (joint approval by the San Francisco Public Utilities Commission)
 - Review and approval of design and engineering plans for non-potable water reuse system and testing prior to issuance of Permit to Operate

Actions by Other Government Agencies

- Bay Area Air Quality Management District
 - Approval of any necessary air quality permits for installation, operation, and testing (e.g., Authority to Construct/Permit to Operate) for individual air pollution sources such as boilers and emergency standby diesel generator
 - Approval of Asbestos Dust Mitigation Plan for construction and grading operations

B. PROJECT SETTING

EXISTING SETTING

The project site is located on Lot 003 of Assessor's Block 1032 at 3333 California Street in the Laurel Heights/Jordan Park area of San Francisco's Presidio Heights neighborhood. The 10.25-acre site is adjacent to the Pacific Heights and Western Addition⁴⁴ neighborhoods (to the east) and just north of the Anza Vista area of the Inner Richmond neighborhood (see Figure 1, p. 3). The project site is occupied by the UCSF Laurel Heights Campus and contains two buildings (the existing office and annex buildings), parking (surface and underground) and roadways, and landscaped areas. The two-story building that houses the SF Fire Credit Union, at the southwest corner of California Street and Presidio Avenue, is not part of the project site.

The irregularly shaped 446,490-square-foot lot is bounded by California Street to the north (an approximately 730-foot-long frontage), Presidio Avenue to the east (an approximately 280-foot-long frontage), Masonic Avenue to southeast (an approximately 422-foot-long frontage), Fulton Avenue to the south (an approximately 348-foot-long frontage), and Laurel Street/Mayfair Drive to the west (an approximately 742-foot-long frontage). The project site's topography exhibits a generally southwest-to-northeast-trending downslope, with its high point of 308 feet at the

⁴⁴ This portion of the Western Addition neighborhood is also referred to as Lower Pacific Heights.

Construction of the proposed project or project variant would require earthwork activities across the entire project site. The depths of excavation would range from 7 to 40 feet below the existing grade (including excavation for the elevators and automobile stacker pits), with a total of approximately 241,300 net cubic yards of excavated soils generated during the approximately 7- to 15-year construction period.^{247,248} With the proposed project or project variant, the existing office building at the center of the site would be adaptively reused and rehabilitated for residential use. New foundations (in the form of footings) would be needed where shear walls terminate at the foundation level. At these locations new spread footings would be created by removing the existing subgrade (essentially fractured bedrock) and new concrete footings would be poured. Where the new shear walls terminate on existing footings, new footing extensions would be required to enlarge the existing footing to support the additional seismic loads. The proposed new buildings around the perimeter of the site along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street/Mayfair Drive would be constructed on shallow footings supported by the native soil or bedrock. The depth of excavation on the northern portion of the site along California Street (and specifically on the northwest portion of the site) would be greatest at up to 40 feet for the two to three-level below grade parking garage (California Street Garage) and building foundations for the Plaza A, Plaza B, and Walnut buildings. The depth of excavation on the south and central portion of the project site (for the Masonic and Euclid building's single level below-grade parking garage and foundation) would be shallower with the shallowest depth of excavation occurring along the eastern edge of the existing office building and along the western edge of Laurel Street for the new Laurel Duplexes. Thus excavations on the south and central portions of the project site would encounter bedrock, and it is likely that bedrock would also be encountered at depth along the northern portion of the site. During excavation of the new building parking garages and/or foundations, a soldier-pile-and-wood-lagging system would be used to support the walls of the excavations. For excavations deeper than approximately 12 feet, tiebacks or internal bracings would be installed to provide lateral resistance and limit the likelihood of the walls of the excavation caving in.

The existing parking garage beneath the eastern wing of the main building has three below-grade levels with a maximum depth of approximately 36 feet below ground surface near the central portion of the site. To avoid effects to the underground levels of the garage from excavation for the proposed California Street Garage, which would be adjacent to and integrated with the existing below-grade garage, drilled piers would be installed along adjacent walls of the new garage structure supported by the bedrock below the elevation of the bottom of the existing parking garage. The same construction and excavation technique would apply to the project variant.

²⁴⁷ Approximately 3,700 cubic yards of excavated soils would be reused on the project site as fill.

²⁴⁸ Construction of the proposed project or project variant could extend over a 15-year timeframe, as discussed above in Section A, Project Description, p. 74, with periods of time when no construction would occur, i.e., same development program but over a longer time.

EXHIBIT D



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: Thursday, July 14, 2016
TO: Don Bragg
FROM: David Lindsay, Planning Department
RE: PPA Case No. 2015-014028PPA for 3333 California Street

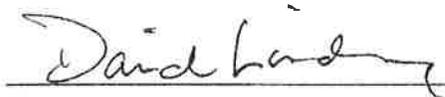
1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Brittany Bendix, at (415) 575-9114 or Brittany.Bendix@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.



David Lindsay, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: Thursday, July 14, 2016
Case No.: **2015-014028PPA**
Project Address: 3333 California Street
Block/Lot: 1032/003
Zoning: RM-1 (Residential, Low-Density)
40-X
Project Sponsor: Don Bragg c/o Prado Group
150 Post Street, Suite 320
San Francisco, CA 94108
415-857-9324
Staff Contact: Brittany Bendix – 415-575-9114
Brittany.bendix@sfgov.org

1650 Mission St
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

DISCLAIMERS:

This Preliminary Project Assessment (PPA) letter provides feedback to the project sponsor from the Planning Department regarding the proposed project described in the PPA application submitted on March 29, 2016, as summarized below. This PPA letter identifies Planning Department review requirements for the proposed project, including those related to environmental review, approvals, neighborhood notification and public outreach, the Planning Code, project design, and other general issues of concern for the project. Please be advised that the PPA application does not constitute an application for development with the Planning Department. The PPA letter also does not represent a complete review of the proposed project, does not grant a project approval of any kind, and does not in any way supersede any required Planning Department approvals listed below.

The Planning Department may provide additional comments regarding the proposed project once the required applications listed below are submitted. While some approvals are granted by the Planning Department, some are at the discretion of other bodies, such as the Planning Commission or Historic Preservation Commission. Additionally, it is likely that the project will require approvals from other City agencies such as the Department of Building Inspection, Public Works, the Municipal Transportation Agency, Department of Public Health, San Francisco Public Utilities Commission, and others. The information included herein is based on the PPA application and plans, the Planning Code, General Plan, Planning Department policies, and local/state/federal regulations as of the date of this document, all of which are subject to change.

filed by the developer of any "major project." A major project is a real estate development project located in the City and County of San Francisco with estimated construction costs exceeding \$1,000,000 where either: (1) The Planning Commission or any other local lead agency certifies an EIR for the project; or (2) The project relies on a program EIR and the Planning Department, Planning Commission, or any other local lead agency adopts any final environmental determination under CEQA. A final environmental determination includes: the issuance of a Community Plan Exemption (CPE); certification of a CPE/EIR; adoption of a CPE/Final Mitigated Negative Declaration; or a project approval by the Planning Commission that adopts CEQA Findings. (In instances where more than one of the preceding determinations occur, the filing requirement shall be triggered by the earliest such determination.) A major project does not include a residential development project with four or fewer dwelling units. The first (or initial) report must be filed within 30 days of the date the Planning Commission (or any other local lead agency) certifies the EIR for that project or, for a major project relying on a program EIR, within 30 days of the date that the Planning Department, Planning Commission, or any other local lead agency adopts a final environmental determination under CEQA. Please submit a Disclosure Report for Developers of Major City Projects to the San Francisco Ethics Commission. This form can be found at the Planning Department or online at <http://www.sfethics.org>.

PLANNING DEPARTMENT APPROVALS:

The project requires the following Planning Department approvals. These approvals may be reviewed in conjunction with the required environmental review, but may not be granted until after the required environmental review is completed.

1. **Rezoning.** As indicated in the 'Preliminary Project Comments' below, various aspects of the project conflict with both the current RM-1 Zoning of the site, as well as City Planning Commission Resolution No. 4109. The Preliminary Project Assessment application indicates the intent of the property owner to pursue a rezoning, potentially to an NC District. Additionally, as noted in the comments below, a Special Use District overlay to the current RM-1 District may also be a potential path for rezoning. In either case, rezoning of the property requires approval by the Board of Supervisors.
2. **Height District Reclassification.** As indicated in the 'Preliminary Project Comments' below, various components of the project exceed the current 40 foot height limit. Accordingly, a height district reclassification of the property must be sought. This also requires approval by the Board of Supervisors.
3. **Conditional Use.** Because the project may seek a rezoning to an NC District, the Code analysis below takes into consideration requirements related to the current RM-1 District, in addition to NC-1, NC-2, NC-3 and NC-S Districts. Depending on the applicable zoning, the following elements of the project may require Conditional Use Authorization by the Planning Commission: development of a building

these spaces and the date of their establishment to make that determination. Details relative to the existing and proposed depth of excavation for garages is also needed. Please note that if the spaces are determined to be legally noncomplying, but are otherwise removed or relocated through the elimination of existing surface parking lots or the reconstruction of an existing parking garage, the spaces will then be abandoned pursuant to Planning Code Section 183 and their re-establishment will need to conform to any applicable zoning controls. In NC Districts 'Automobile Parking' as a commercial use is defined in Planning Code Section 790.8 and is principally permitted in NC-S Districts, but requires Conditional Use authorization in NC-1, NC-2, and NC-3 Districts. Please note that any Conditional Use applications for parking exceeding accessory amounts must meet the additional criteria set forth in Planning Code Section 157. Given the Planning Department's concerns regarding the amount of proposed off-street parking referenced in both the 'Environmental Review' and 'Preliminary Design Comments' sections of this letter, you are strongly encouraged to substantially reduce or eliminate any proposed non-accessory commercial parking.

10. City Planning Commission Resolution 4109. In 1952, the City Planning Commission adopted Resolution 4109 which approved a rezoning of the subject property to a First Residential District and included additional stipulations subject to future development of the site. The site has subsequently undergone additional rezoning, as it is now within an RM-1 District. However, the stipulations of future development as outlined in Resolution 4109 continue to apply, absent modification by the Board of Supervisors per Planning Code Section 174. As expected, given that there have been more than 60 years of changes to the Planning Code there are some distinctions between the current RM-1 District controls and the stipulations outlined in Resolution 4109. In the project comments that follow, when there is an inconsistency, the more restrictive is noted as the guiding control. As indicated in the Preliminary Project Assessment application, the project may result in the rezoning of the property which requires review and approval by the Board of Supervisors. Amending Resolution 4109 would also require review and approval by the Board of Supervisors.

a. Residential Uses. In general, the RM-1 District controls are more restrictive than the Stipulations of Resolution 4109. However, the stipulations are more restrictive when defining the density and buildable area requirements as applicable to a portion of the subject property fronting on Laurel and Euclid Avenues. At present, the project does not comply with these restrictions and would require amending the Resolution.

11. Residential Density. The subject property is within an RM-1 District which permits a residential density of up to one unit per 800 square feet of lot area. However, as a Planned Unit Development the proposal may seek approval for a density equal to one less unit than what is permitted by the district with the next greater density (RM-2). In consideration of rezoning the property, please note the following maximum residential densities for each zoning district: NC-1, NC-2 and NC-S Districts, generally, up to one unit per 800 square feet of lot area; and, in NC-3 Districts, generally up to one

EXHIBIT E

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov



August 31, 2018

John Rothman, President
Kathryn Devincenzi, Vice President
Laurel Heights Improvement Association of San Francisco
22 Iris Avenue
San Francisco, California 94118

**RE: Fireman's Fund Insurance Company, Determination of Eligibility
National Register of Historic Places**

Dear Mr. Rothman and Ms. Devincenzi:

I am writing to inform you that on August 29, 2018, Fireman's Fund Insurance Company was determined eligible for the National Register of Historic Places (National Register). As a result of being determined eligible for the National Register, this property has been listed in the California Register of Historical Resources, pursuant to Section 4851(a)(2) of the California Code of Regulations.

There are no restrictions placed upon a private property owner with regard to normal use, maintenance, or sale of a property determined eligible for the National Register. However, a project that may cause substantial adverse changes in the significance of a registered property may require compliance with local ordinances or the California Environmental Quality Act. In addition, registered properties damaged due to a natural disaster may be subject to the provisions of Section 5028 of the Public Resources Code regarding demolition or significant alterations, if imminent threat to life safety does not exist.

If you have any questions or require further information, please contact Jay Correia of the Registration Unit at (916) 445-7008.

Sincerely,

A handwritten signature in black ink, appearing to read "Julianne Polanco".

Julianne Polanco
State Historic Preservation Officer

Enclosure

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

1. Name of Property

Historic name: Fireman's Fund Insurance Company Home Office

Other names/site number: University of California at San Francisco Laurel Heights Campus

Name of related multiple property listing:

N/A

(Enter "N/A" if property is not part of a multiple property listing)

2. Location

Street & number: 3333 California Street

City or town: San Francisco 94118 State: CA County: San Francisco 075

Not For Publication: Vicinity:

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___ national ___ statewide ___ local

Applicable National Register Criteria:

___ A ___ B ___ C ___ D

<p>_____ Signature of certifying official/Title:</p>	<p>_____ Date</p>
<p>_____ State or Federal agency/bureau or Tribal Government</p>	

<p>In my opinion, the property ___ meets ___ does not meet the National Register criteria.</p>	
<p>_____ Signature of commenting official:</p>	<p>_____ Date</p>
<p>_____ Title : State or Federal agency/bureau or Tribal Government</p>	

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

The Service Building is a steel frame and reinforced concrete structure enclosed in brick. Its openings are limited to glass and aluminum doors, a few window openings, and ventilating louvers in the boiler room.

LANDSCAPE

Landscape Features Associated with the Mid-1950s Design

The landscape was an integral part of the original design for the new corporate headquarters commissioned by Fireman's Fund in the mid-1950s. The San Francisco-based firm of Eckbo, Royston, and Williams (ERW) was the landscape architect for the original landscape design, completed in 1957, and its successor firm Eckbo, Dean, Austin, and Williams (EDAW) designed the landscape associated with the mid-1960s additions. The landscape setting around the modernist Office Building integrates functional needs (such as parking lots and internal circulation) with large areas of lawns and structured outdoor spaces (the Terrace, Entrance Court, and the Auditorium's outdoor spaces). The landscape is designed to promote the integration between architecture and landscape and uses forms and materials that are characteristic of modernist designs from the mid-twentieth century. (See Map 2 and Map 3)

Brick Wall

A brick wall, which takes different forms, provides a continuous and unifying element around the edges of the site. It exists as a retaining wall along the perimeter of the property's northeast, north, and west sides. Three gated entrances—one for the employees on California Street and the service and executive/visitor entrances on Laurel Street—are integrated into these sections of the wall. Each of these three entrances has a separate vehicular and pedestrian opening framed by brick pillars and secured by a double-leaf, metal rail gate when the property is closed. On the south side of the Executive/Visitor Gate, the perimeter wall is transformed into low retaining walls that define a series of planting beds along the west end and south side of the Executive Wing. The wall continues along the outer edge of the Terrace garden, along the bank that parallels Masonic Avenue, and then reconnects to the southeast corner of the Office Wing (east). Here rectangular brick planting beds have been incorporated into the wall, creating a zig-zag alignment similar to that found in other locations (i.e., on the bank along Laurel Street in the vicinity of the Entrance Court, on the southwest side of the Terrace, and in the bench wall that frames the eastern side of the Terrace).

Parking Lots and Internal Circulation

Two parking lots occupy the land in front (north) of the Office Building. The East Parking Lot and the West Parking Lot sit on either side of the entry drive, which aligns with the Employee Gate and an employee entrance (E2) into the Office Building.

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

for sidewalks; the exposed aggregate concrete divided into panels by rows of brick in the pavement at the Terrace and in the Auditorium's west-side sitting area; the metal for the entrance gates; the custom-designed wood benches found in the Terrace and at the Entrance Court's outdoor sitting area; and the circular tree beds constructed of modular sections of concrete found in the Terrace the Auditorium's west-side sitting area.

Combined Buildings and Landscape

Together the buildings and landscape of the Fireman's Fund Home Office constitute a single resource that possesses integrity as measured by the seven aspects of integrity, as follows:

- 1) Location: The property is in its original location. It has not been moved.
- 2) Design: The property retains the essential elements of its design and the relationship between the parts of the design. Alterations to the design since the period of significance are relatively minor. It retains integrity of design.
- 3) Setting: The setting of the property is the same in all major respects as at the time it was first built. It retains integrity of setting.
- 4) Materials: The materials used in the buildings and landscape during the period of significance are all present. The property retains integrity of materials.
- 5) Workmanship: Evidence of workmanship, both from craftsmanship (brick and landscape features) and industrial processes (glass manufacture, concrete finishing, extrusion of aluminum) are all present. The property retains integrity of workmanship.
- 6) Feeling: Because the property as a whole – its buildings and landscape – are little altered and have been well-maintained, it retains integrity of feeling from the period of significance.
- 7) Association: Apart from the lettering on the outside wall near two entrance gates with the name of the current owner and occupant of the property, the property is almost indistinguishable from the time of its ownership by Fireman's Fund Insurance Company. Thus it retains integrity of association.

CHARACTER DEFINING FEATURES

Office Building

Plan of the building with wings open along the sides to the immediate landscape and to views of the distant city.

Horizontality of massing

Horizontal lines of projecting edges of concrete floors

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

Horizontal bands of nearly identical window units

Uninterrupted glass walls

Window units of aluminum and glass

Circular garage ramps

Exposed concrete piers over the Garage

Wrought iron deck railings that match gates in the landscape

Brick accents and trim

Service Building

Massing of rectangular volumes

Brick walls with a minimum of openings

Landscape

Terrace, as the “centerpiece” of the landscape, designed to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco); key character-defining features include its biomorphic-shaped lawn surrounded by a paved terrace and patio (paved with exposed aggregate concrete divided into panels by rows of brick); brick retaining wall and large planting bed around the east and north sides of the paved patio, custom-designed wood benches, and three circular tree beds constructed of modular sections of concrete.

Entrance Court, providing a connection between the Executive/Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria Wing; key character-defining features include a central paved parking lot surrounded on its north, east, and west sides by narrow planting beds; exposed aggregate sidewalks along the north, east, and west sides of the parking lot; and a low free-standing brick wall along its north side.

Two outdoor sitting areas—one on the east side of the Auditorium and one on its west side—that connect to entrances into the Auditorium; key character-defining features for the area on the west side of the Auditorium include the pavement (exposed aggregate divided into panels by rows of bricks), circular tree bed constructed of modular sections of concrete; and metal benches; key character-defining features for the area on the east side of the Auditorium include the pavement (concrete divided into panels by wood inserted into expansion joints).

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

Brick wall (constructed of red brick set in running bond pattern similar in appearance to brick used in exterior of main building) that takes several forms and which forms a continuous and unifying element around the edges of the site.

Three gated entrances—one for the employees on California Street and the service and executive/visitor entrances on Laurel Street—that are integrated into the brick perimeter wall.

Internal Circulation System (entrance drive, service drive, East and West Parking lots)

Vegetation features that helps to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods including (1) the large trees in and around the East and West Parking Lots, (2) the lawns on the west, south, and east sides of the property, and (3) the planted banks along Laurel and Masonic streets.

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

8. Statement of Significance

Applicable National Register Criteria

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Property is associated with the lives of persons significant in our past.
- C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D. Property has yielded, or is likely to yield, information important in prehistory or history.

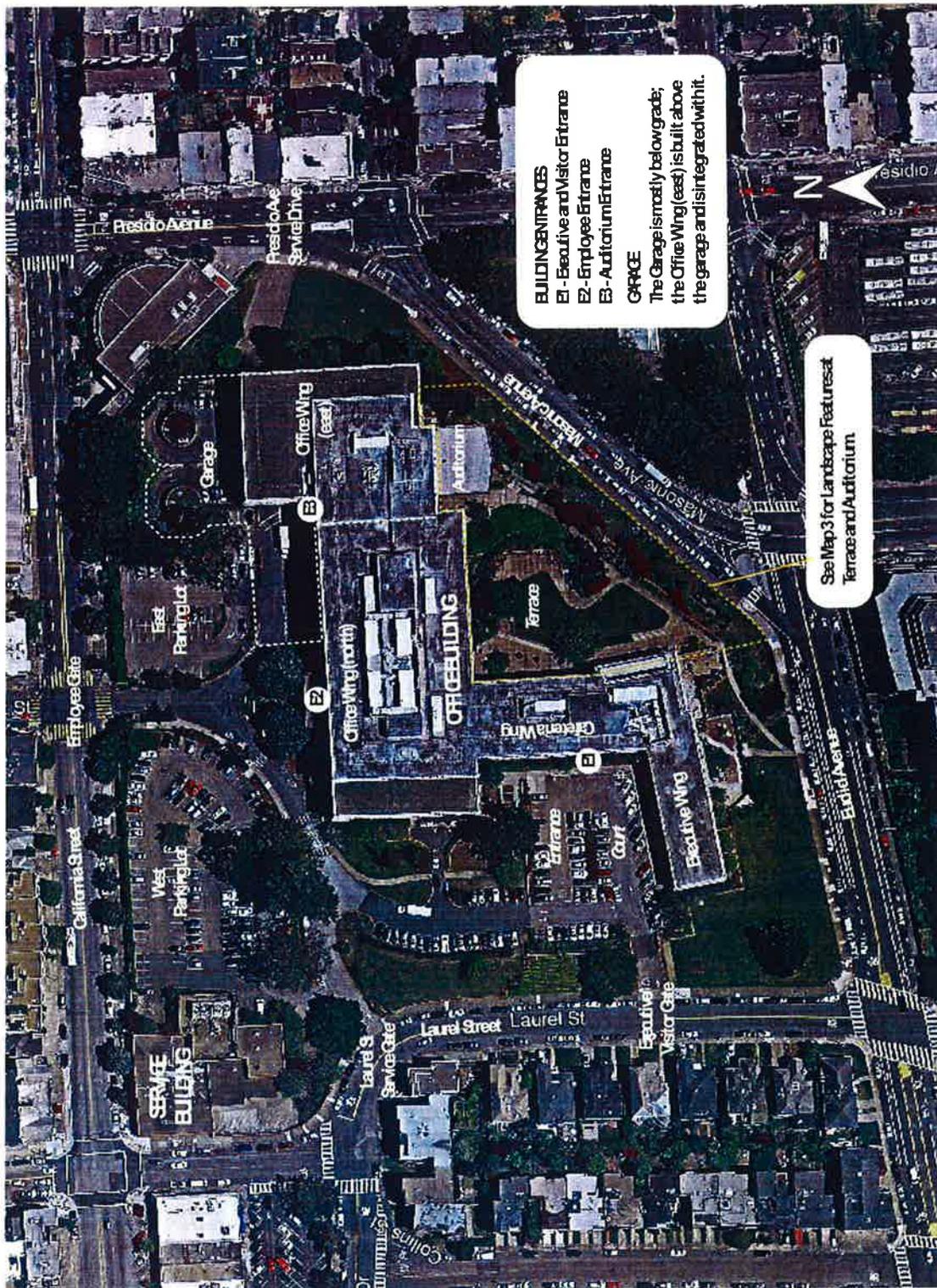
Criteria Considerations

(Mark "x" in all the boxes that apply.)

- A. Owned by a religious institution or used for religious purposes
- B. Removed from its original location
- C. A birthplace or grave
- D. A cemetery
- E. A reconstructed building, object, or structure
- F. A commemorative property
- G. Less than 50 years old or achieving significance within the past 50 years

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State



Map 2. Sketch Map. Source: Google Earth, photo taken April 2016, annotated by Denise Bradley and Michael Corbett

EXHIBIT F

John Butler <dsafier@pradogroup.com>

Thu, Oct 12, 2017 at 3:45 PM

To: John Rothmann <johnrothmann2@yahoo.com>, Dan Kingsley <dkingsley@sksre.com>

Cc: Kathy Devincenzi <krdevincenzi@gmail.com>, Catherine Carr <catherine.a.carr@gmail.com>, "M.J. Thomas" <mjnsf@comcast.net>, Richard Frisbie <frfbeagle@gmail.com>

Dear John, Kathy, Catherine, M.J., and Dick:

First of all John, thank you for the meeting last week at your home. As we agreed in the meeting, we are responding to your recent questions regarding the project. We have re-arranged your questions slightly to group them according to subject. If we haven't answered any of your questions, please let us know. We very much appreciate your willingness to promptly write back to us with your five outstanding issues on the project that are currently preventing us from obtaining LHIA support for the project. We appreciate your doing this so we can set a follow up meeting to find a mutually workable solution.

LHIA Questions:

Q: You also stated that Prado wants to have a development agreement to lock in entitlements for longer periods of time than would normally be allowed?

A: Yes, we are looking to enter into a development agreement (DA) with the City for a term of approximately 15 years. For large projects with multiple buildings like 3333 California Street, the City generally requires a DA. The DA vests the entitlements, protecting the entitlements from changes in the law in exchange for certain community benefits. This would include the community benefit of certainty of the entitlements during that period. If we did not build the project during the term of the DA, then the DA would expire and we would lose the protections of the DA.

Q: What portion of the project would be built first?

A: At this time, we have assumed that the Masonic and Euclid buildings would be built first. In general, we anticipate construction beginning with a staging and site preparation phase, which will include some demolition, then excavation for underground parking, followed by construction of the buildings. With the exception of work on the sidewalks, addition of landscaping, paving, and connecting to the City's various systems and utilities, our general contractor, Webcor Builders, is anticipating that construction will occur within the site. We will be preparing a detailed construction management plan, and the EIR will include mitigation measures around construction emissions, air quality, etc. with which we will have to comply.

Q: What would you expect to be built in each successive phase of the project?

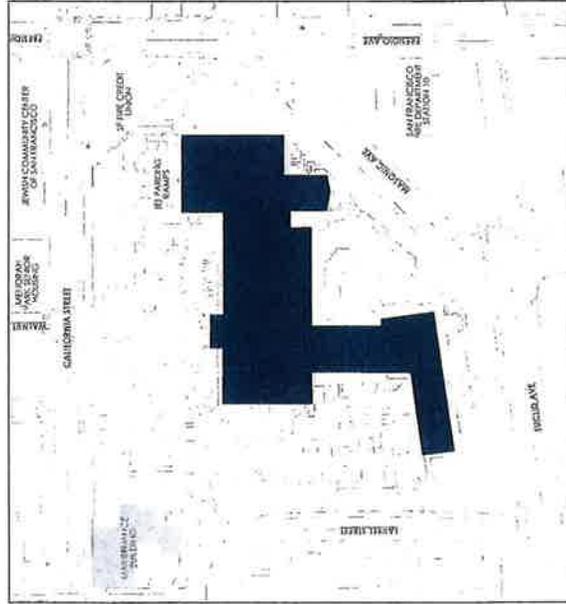
A: At this time, we anticipate the following in each phase – Phase 1: Masonic and Euclid buildings; Phase 2: Center Buildings A and B; Phase 3: Plaza A, Plaza B and Walnut buildings; and Phase 4: Mayfair Building and Laurel Duplexes.

Q: What do you anticipate the total period of time will be during each phase of construction?

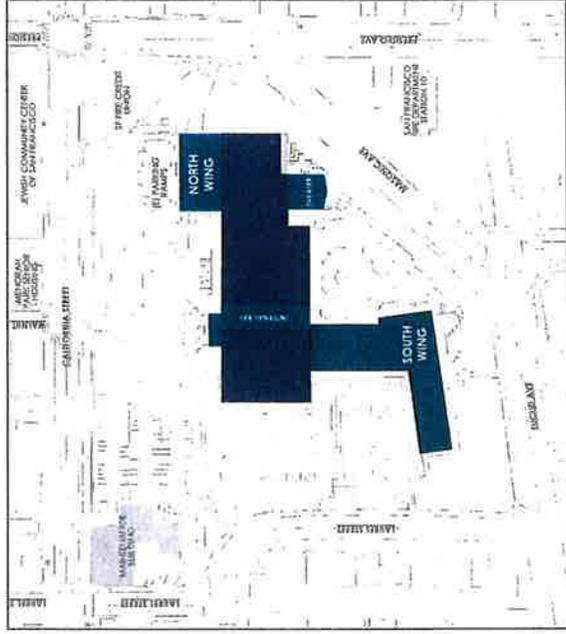
A: Our current planning assumes that each phase would overlap, e.g., Phase 2 begins approximately 20 months after Phase 1. Specifically, we think Phase 1 could take 30 months, Phase 2 could take 24 months, Phase 3 could take 36 months, and Phase 4 could take 20 months. Assuming an overlap of phases, from start to finish it could take approximately six to seven years to complete all phases of the construction. This construction phasing and related

EXHIBIT G

EXISTING BUILDING
 362,000 GSF
 (not including parking or annex)



PROPOSED REMOVAL
 185,958 GSF REMOVED
 (not including parking)



PROPOSED CENTER A & B
 322,888 GSF
 (not including parking)



3333 CALIFORNIA STREET SAN FRANCISCO, CA

CENTER A & B: EXISTING CONDITIONS + PROPOSED ADAPTATION



08.17.2017
 PLANNING APPLICATION SUBMITTAL

A6.00

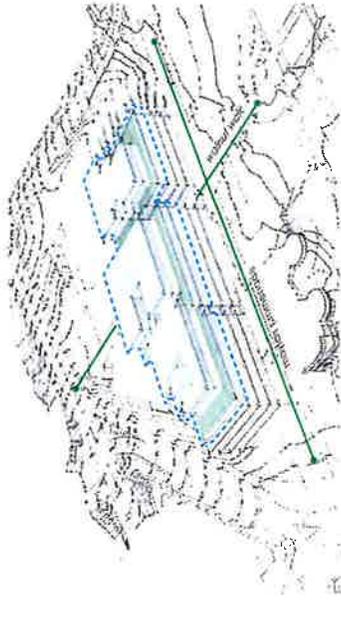
1 Partial removal of existing structure, freeing up Mayfair Promenade axis.



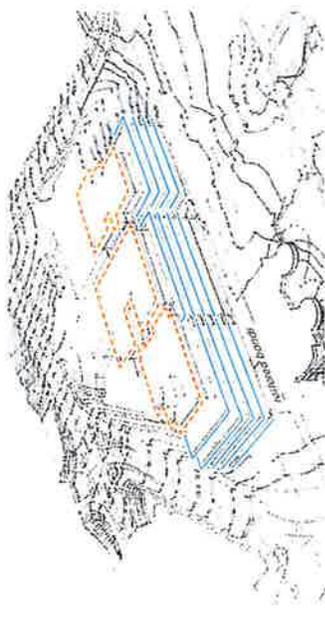
2 Rebuild and reinforce the existing 4th floor and cut opening for Walnut Walk axis.



3 Add one and two floors that are set back from the existing building edge.



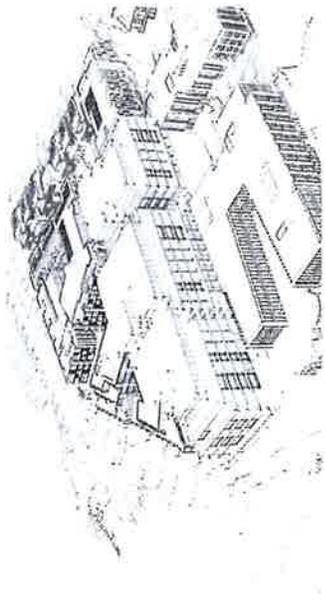
4 Restore the horizontal bands and add warm soffits to upper floor overhangs.



5 Articulate the exterior with high-performance glass, reveals at demising walls and bay windows at the bedrooms.



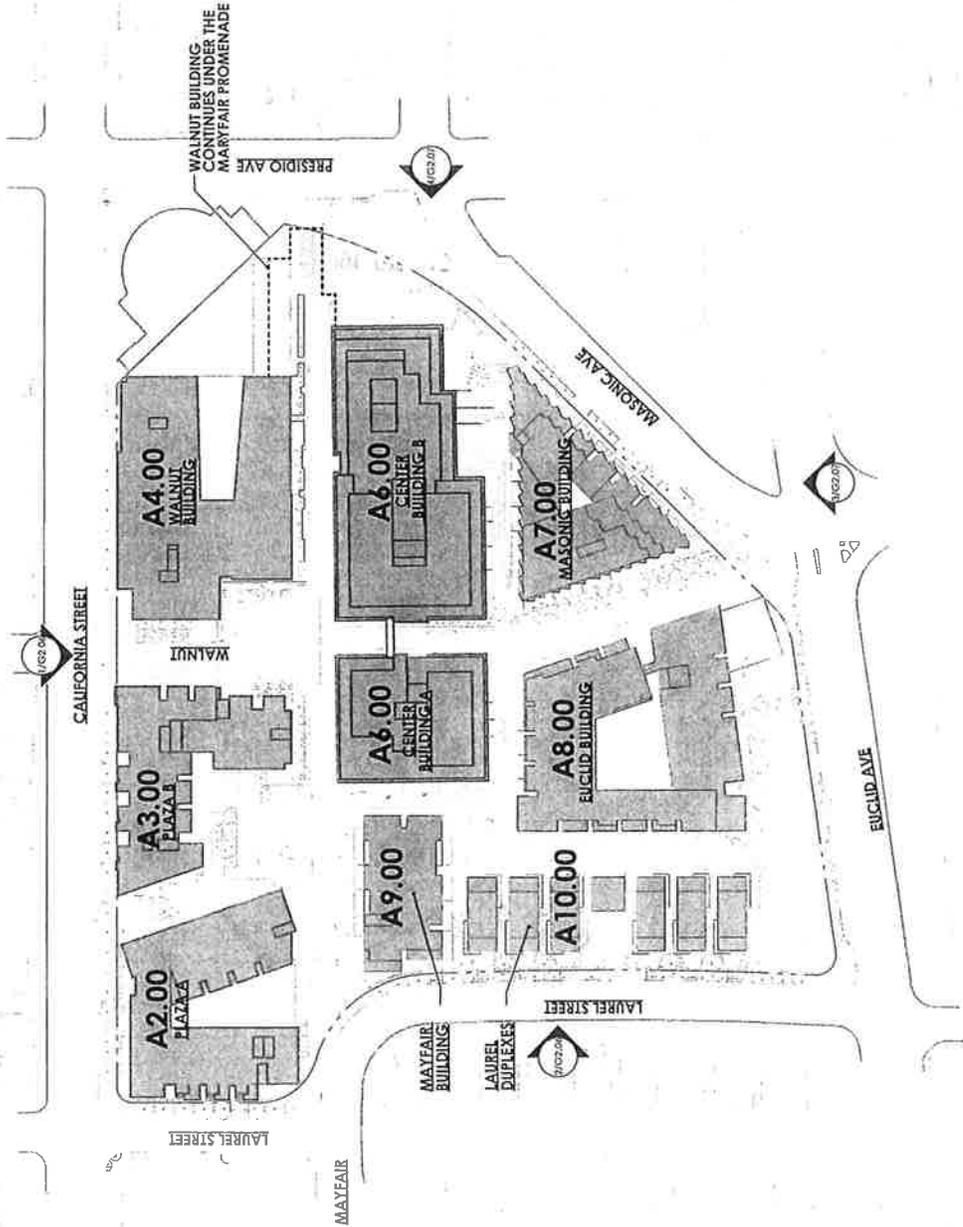
6 Completed design.



REMOVALS: THE SOUTH WING, NORTH WING AND THEATER ARE REMOVED TO REDUCE THE BUILDING BULK AND MASS. AN INTERNAL BAY IS OPENED UP TO CREATE WALNUT WALK.

RESTORE AND REBUILD: THE EXISTING HORIZONTAL FLOOR LINES WILL BE RESTORED AND THE UPPER FLOORS WILL BE REBUILT WITH SETBACKS.

PROPOSED DESIGN: THE RESIDENTIAL QUALITY OF THE DESIGN IS ENHANCED WITH ARTICULATED BAY WINDOWS AT THE BEDROOMS. THIS MODULATES THE HORIZONTALITY OF THE OVERALL MID-CENTURY COMPOSITION AND RELATES TO THE NEW BUILDINGS AND THE EXISTING NEIGHBORHOOD.



FOLLOWING THE PPA SUBMITTAL THE "PRESIDIO BUILDING" WAS REMOVED FROM THE PROJECT AS SERIES IS OMITTED FROM DRAWING SET.

KEYING SITE PLAN - PROPOSED

08.17.2017
 PLANNING APPLICATION SUBMITTAL



G1.02

3333 CALIFORNIA STREET SAN FRANCISCO, CA