Preliminary Project Assessment

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

Reception:

415.558.6378

Fax:

415.558.6409

Planning Information: **415.558.6377**

 Date:
 July 6, 2012

 Case No.:
 2012.0605U

Project Address: 300 California Street

Block/Lot: 0238/002

Zoning: C-3-O (Downtown-Office Commercial)

400-S Height and Bulk District

Project Sponsor: Andrew Junius, Reuben and Junius, LLP

(415) 567-9000

Staff Contact: Don Lewis – (415) 575-9095

don.lewis@sfgov.org

DISCLAIMERS:

Please be advised that this determination does not constitute an application for development with the Planning Department. It also does not represent a complete review of the proposed project, a project approval of any kind, or 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, Department of Public Works, Department of Public Health, and others. The information included herein is based on plans and information provided for this assessment and 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.

PROJECT DESCRIPTION:

The approximately 15,097-square-foot project site is located in downtown San Francisco, on a block bounded by Sacramento Street to the north, Battery Street to the east, Sansome Street to the west, and California Street to the south. The project site, which fronts on California, Battery, and Halleck Streets, is currently occupied by a 129-foot-tall, eight-story over basement, 133,598-square-foot building comprising approximately 107,261 square feet of office use, 11,412 square feet of retail use, and 77 off-street parking spaces. The proposed project would involve the construction of seven additional stories to create approximately 99,293 square feet of new office use. The proposed project would include the removal of the existing rooftop penthouse, the renovation of the existing ground-floor lobby, and the addition of approximately 2,232 square feet of publicly-accessible open space at the roof-top level. The existing basement parking, the ground-floor retail uses, and the one loading space would remain. The finished building would be 241 feet tall, 15 stories, 232,891 square feet in size with 206,554 square feet of office use, 11,412 square feet of ground-floor retail use, and 77 off-street parking spaces. The existing building was constructed in 1946.

ENVIRONMENTAL REVIEW:

The project initially requires the following environmental review. This review may be done in conjunction with the required approvals listed below, but must be completed before any project approval may be granted:

An Environmental Evaluation Application is required for the full scope of the project. Below is a list of studies that would be required based on our preliminary review of the project as it is proposed in the Preliminary Project Assessment (PPA) submittal dated May 7, 2012:

a. Historical Resources. The proposed project consists of a seven-story vertical addition to a building constructed 50 or more years ago. Based on the age of the building, the project is subject to the Department's Historic Preservation review. Under CEQA, evaluation of the potential for proposed projects to impact "historical resources" is a two-step process: the first is to determine whether the property is an "historical resource" as defined in Section 15064.5(a)(3) of CEQA; and, if it is an "historical resource," the second is to evaluate whether the action or project proposed by the sponsor would cause a "substantial adverse change" to the historical resource. To assist in analysis of the proposed project, the Department requires a Historic Resource Evaluation Report (HRER), focused on evaluating impacts of the proposed project on identified historical resource(s), to be prepared by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards in Historic Architecture or Architectural History. The HRER should focus on evaluation of the proposed project for conformance with the Secretary of the Interior's Standards for Rehabilitation (Secretary's Standards), and assess potential impacts to historical resources.

As the proposed project will construct an addition of 10,000 square feet or more, use of the Historic Resource consultant pool for identification of a preservation consultant to prepare the HRER shall be required. The Department will provide the project sponsor with a list of three consultants from the Historic Preservation Consultant Pool, which shall be known as the "potential consultant list" or "PCL," upon submittal of the Environmental Evaluation Application.

b. Archeological Review. The proposed project would require a Preliminary Archeological Review (PAR) which would be conducted in-house by the Planning Department archeologist. During the PAR it will be determined what type of soils disturbance/modification will result from the project, such as excavation, installation of foundations, soils improvement, site remediation, etc. Any available geotechnical/soils or phase II hazardous materials report prepared for the project site will be reviewed at this time. Secondly, it will be determined if the project site is in an area that is archeologically sensitive. The results of this review will be provided in a memorandum to the Environmental Planner assigned to the project When it is found that the project has the potential to affect an archeological resource, the PAR memorandum will identify appropriate additional actions to be taken including the appropriate archeological measure and/or if additional archeological studies will be required as part of the environmental evaluation.

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- c. Shadow Fan Analysis. Planning Code Section 295 generally prohibits new buildings that would cast new shadow on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space. Staff has prepared a preliminary shadow fan that indicates potential shadow impacts from the project on portions of St. Mary's Square, Maritime Plaza, Sue Bierman Park and Justin Herman Plaza. However, this shadow fan does not account for the presence of intervening buildings or shadow already cast on these properties. Please note that further graphic analysis will be necessary to determine if the project could create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas pursuant to CEQA. The shadow study application is available online at www.sfplanning.org.
- d. Wind Analysis. Planning Code Section 148, Reduction of Ground-Level Wind Currents in C-3 (Downtown Commercial) Districts, establishes two comfort criteria, and a hazard criterion used in analysis of wind impacts in San Francisco. The 7-miles-per-hour (mph) and 11-mph comfort criteria for seating and pedestrian areas, respectively, are based on pedestrian-level wind speeds that include the effects of turbulence; these are referred to as "equivalent wind speeds," and are reported as the wind speed that is exceeded 10 percent of the time. The hazard criterion is an equivalent wind speed of 26 mph for a full hour, or approximately 0.0114 percent of the time, not to be exceeded more than once during the year. Project compliance with the wind comfort and wind hazard criteria of Section 148 are used as significance criteria to determine potential wind impacts of the project. To determine whether the proposed project would alter wind in a manner that substantially affects public areas pursuant to CEQA and to determine compliance with Section 148, a wind-tunnel analysis is required.
- e. *Air Quality*. The project involves the construction of seven additional stories to an existing eight-story building. Project-related construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. To reduce construction dust impacts, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI). Pursuant to the Construction Dust Ordinance, the proposed project would be required to comply with applicable dust control requirements outlined in the ordinance.

In addition to construction dust, demolition and construction activities would require the use of heavy-duty diesel equipment which emit diesel particulate matter (DPM). DPM is a designated toxic air contaminant, which may affect sensitive receptors located up to and perhaps beyond 300 feet from the project site. Additional measures may be required to reduce DPM emissions from construction vehicles and equipment.

The proposed project is likely to require a diesel back-up generator which would result in toxic air contaminants that may affect both on-site and off-site sensitive receptors.

During the environmental review process the proposed project will be reviewed to determine whether mitigation measures in the form of either construction emissions minimization measures or air filtration and ventilation mitigation measures will be required. Should the project include stationary sources of air pollutants including, but not limited to, diesel boilers or back-up generators, an Air Quality Technical Report may be required for additional air pollutant modeling. If an Air Quality Technical Report is required, the project sponsor must retain a consultant with experience in air quality modeling to prepare a scope of work that must be approved by Environmental Planning prior to the commencement of any required analysis and/or modeling determined necessary.

If the project has the potential to expose sensitive receptors to pollutant levels above thresholds set by the Bay Area Air Quality Management District, specific mitigation measures may be required.

f. Greenhouse Gas Compliance Checklist for Private Development Projects. BAAQMD's San Francisco's Strategies to Address Greenhouse Gas Emissions presents a comprehensive assessment of policies, programs and ordinances that collectively represent San Francisco's qualified greenhouse gas (GHG) reduction strategy. Projects that are consistent with San Francisco's GHG reduction strategy would result in less-than-significant GHG emissions.

In order to facilitate a determination of compliance with San Francisco's GHG reduction strategy, the Planning Department has prepared a Greenhouse Gas Analysis Compliance Checklist. The planner or CEQA consultant in coordination with the project sponsor would prepare this checklist.

g. Transportation Impact Study. Based on the PPA submittal, a transportation impact study is not anticipated. However, please note that an official determination will be made subsequent to submittal of the environmental evaluation application. Circulation will be reviewed upon submittal of the environmental evaluation application. The project description should clearly state what, if any, circulation changes are proposed, and the plans should clearly delineate the loading area (dimensions) and explain how trucks would access the site. The addition of approximately 100,000 square feet of office uses would result in an increase in loading demand. In addition, the plans should add bicycle parking.

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¹ San Francisco's *Strategies to Address Greenhouse Gas Emissions* is available online at: http://www.sfplanning.org/index.aspx?page=1570.

- h. Notification of a Project Receiving Environmental Review. Notice is required to be sent to occupants of properties adjacent to the project site and owners of properties within 300 feet of the project site. Please provide these mailing labels at the time of submittal.
- i. Flood Notification. The project site is on a block that has the potential to flood during storms. Contact Cliff Wong of the San Francisco Public Utilities Commission at (415) 554-8339 regarding the requirements below. Applicants for building permits for either new construction, change of use or change of occupancy, or for major alterations or enlargements shall be referred to the San Francisco Public Utilities Commission (SFPUC) at the beginning of the process, for a review to determine whether the project would result in ground level flooding during storms. The side sewer connection permits for such projects need to be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning Department, the Department of Building Inspection, or the Redevelopment Agency. The SFPUC and/or its delegate (SFDPW, Hydraulics Section) will review the permit application and comment on the proposed application and the potential for flooding during wet weather. The permit applicant shall refer to PUC requirements for information required for the review of projects in flood prone areas. Requirements may include provision of a pump station for the sewage flow, raised elevation of entryways, and/or special sidewalk construction and the provision of deep gutters.

Please note that this project is not likely to qualify for a Categorical Exemption under CEQA and an Initial Study would be required. The Initial Study will help determine that either (1) the project may be issued a Negative Declaration stating that the project would not have a significant effect on the environment (with mitigation), or (2) an Environmental Impact Report (EIR) is required to analyze one or more potentially significant physical environmental impacts.

The environmental evaluation application is available in the Planning Department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at www.sfplanning.org. To determine fees for environmental review, please refer to page one of our fee schedules, under "Studies for Projects outside of Adopted Plan Areas."

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. Downtown Project Authorization

In order for the project to proceed, the Planning Commission would need to determine that the project complies with Planning Code Section 309. This Section establishes a framework for review of projects within C-3 Districts to ensure conformity with the Planning Code and the General Plan, and modifications may be imposed on various aspects of the project to achieve this conformity. These aspects include overall building form, impacts to public views, shadows and wind levels on sidewalks and open spaces, traffic circulation, relationship of the project to the streetscape, design of

open space features, improvements to adjacent sidewalks (including street trees, landscaping, paving material, and street furniture), quality of residential units, preservation of on-site and off-site historic resources, and minimizing significant adverse environmental effects. Through the Section 309 Review process, the project sponsor may also request exceptions from certain requirements of the Planning Code. As proposed, it appears that the project would need to be redesigned to comply with the Code, or may require the following exceptions.

- Bulk (see Item 3 under 'Preliminary Project Comments').
- Separation of Towers (see Item 4 under 'Preliminary Project Comments').

2. Variances

As currently proposed, and as discussed under 'Preliminary Project Comments' below, several aspects of the project do not comply with the requirements of the Planning Code. These aspects are not eligible for an exception under Planning Code Section 309. Therefore, the project must be revised to comply with the Planning Code, or Variances must be sought for these aspects of the project:

- Public Open Space (see Item 2 under 'Preliminary Project Comments').
- Ground Floor Uses (see Item 6 under Preliminary Project Comments').
- Bicycle Parking/Showers (see Item 7 under 'Preliminary Project Comments').

3. Office Allocation

Pursuant to Planning Code Section 321 and 322, an Office Allocation Application is required for additions of greater than 25,000 square feet of office use.

4. Building Permit Application

A Building Permit application is required for the proposed building alterations. Building permit applications are available at the Department of Building Inspection at 1660 Mission Street.

NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

Project Sponsors are encouraged to conduct public outreach with the surrounding community and neighborhood groups early in the development process. Additionally, many approvals require a public hearing with an associated neighborhood notification. Differing levels of neighborhood notification are mandatory for some or all of the reviews and approvals listed above.

CITYWIDE POLICY & ANALYSIS COMMENTS:

The proposed project appears compliant with the vision established in the Downtown Plan. The proposed massing, intended uses and façade of the addition appear well integrated with the existing structure and surrounding neighborhood context.

PRELIMINARY DESIGN COMMENTS:

The following comments address preliminary design issues that may significantly impact the proposed project:

1. The Planning Department appreciates and approves of the overall design, articulation, massing, and the integration of the existing building with the proposed building except for the Halleck Street frontage. The 'after' elevation appears to be closed. It should provide an active and transparent ground floor frontage. The logic of the building's composition of vertically articulated modules should be brought down to grade.

PRELIMINARY PROJECT COMMENTS:

The following comments address specific Planning Code and other general issues that may significantly impact the proposed project:

- 1. Floor Area Ratio. Per Section 124, buildings within the C-3-O District may reach a Floor Area Ratio of 9.0 to 1, or up to a maximum of 18.0 to 1 with the acquisition of Transferable Development Rights (TDR). A maximum of 271,746 gross square feet may be developed on the project site with the acquisition of TDR. Future submittals should provide a detailed calculation of the gross floor area of the project, including floor plans which clearly indicate those areas included within the calculation of "gross floor area" pursuant to the definition in Section 102.9.
- 2. Public Open Space. Projects proposing an addition of gross floor area equal to 20 percent or more of an existing building in the C-3-O Zoning District must provide public open space at a ratio of one square foot per 50 gross square feet of all uses, except residential uses, institutional uses, and uses in a predominantly retail/personal services building. The public open space must be located on the same site as the building or within 900 feet of it within a C-3 District. The area of the proposed vertical extension, in addition to the area of existing office and retail uses, would require public open space in the amount of approximately 4,359 square feet.

The proposed publically accessible open space provided by the project in the form of the roof terrace would equal approximately 2,322 gross square feet, which would leave the project site deficient in publically accessible open space area as no other publically accessible open spaces have been identified on the project site other than the proposed rooftop terrace. Options need to be explored that would address the open space deficiency by adding more publically accessible open space onsite or within 900 feet of the site within a C-3 District as set forth in Planning Code Section 138. Alternatively, a Variance may be sought to address the publically accessible open space deficiency.

3. *Bulk.* Buildings within "S" bulk districts are subject to specified bulk controls for the "lower tower" and "upper tower" portion of the building. Based on the proposed height of the vertical extension and the width of California Street, the lower tower controls would apply above a height of approximately 103 feet, and the upper tower controls would apply above a height of approximately 160 feet. The project complies with the dimensional bulk controls for the lower tower, but exceeds the following dimensional controls for the upper tower above 160 feet:

Upper Tower	Maximum Permitted	Proposed (est.)
Bulk Control	(Per Section 270, Chart B)	Troposed (est.)
Maximum Average Floor Plate Size	12,000 square feet	13,123 square feet
Maximum Diagonal	160 ft.	162 ft.

The project, as proposed, must either be redesigned to comply with the bulk limitations, or would require an exception to these bulk controls pursuant to Section 309, demonstrating compliance with the criteria specified in Section 272.

4. Upper-Level Setbacks/Separation of Towers. Per Section 132.1(a), setbacks of upper parts of a building may be required through the Section 309 process in order to preserve the openness of the street to the sky, reduce unrelieved massing of adjacent tall buildings, and maintain the continuity of a predominant streetwall. Per Section 132.1(c), buildings within "-S" bulk districts must provide a minimum setback of 15 feet from the interior property lines that do not abut a public street and from the centerlines of abutting streets.

The portion of the vertical extension along the westerly property line does not comply with this requirement; therefore, an exception must be requested pursuant to Section 309. The project must be redesigned to comply with the "Separation of Towers" requirements, or future submittals should discuss how the project meets the criteria for this exception under Section 132.1(c)(2). Future submittals should also provide a detailed analysis of the setback from the centerline of Halleck Street as this frontage could also potentially be part of such exception findings.

5. Shadow Impacts. Section 295 generally prohibits new buildings and additions to existing buildings over 40 in height that would cast new shadow on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space.

Staff has prepared a preliminary shadow fan to indicate potential shadow impacts from the project on portions of St. Mary's Square, Maritime Plaza, Sue Bierman Park and Justin Herman Plaza. However, this shadow fan does not account for the presence of intervening buildings or shadow already cast on these properties. Please note that further graphic analysis will be necessary to definitively conclude that there will or will not be shadow impacts to these properties.

Sections 146 and 147 specify that buildings should generally be shaped to reduce substantial shadow impacts to public sidewalks within C-3 Districts, as well as publicly-accessible open spaces that are not protected under Section 295. Future submittals should provide detailed graphic, quantitative,

and qualitative analysis of shadow impacts to such spaces, as well as other publicly-accessible open spaces in the vicinity. This information will allow staff to assess whether the project complies with Sections 146 and 147, and to conclude whether the additional shadow would result in a significant impact under CEQA.

- Street Frontages. Per Section 145.1, all ground floor frontages that are not used for parking and loading access, building egress and mechanical systems must be occupied by active uses. Based on the proposed elevations, the Halleck Street ground floor frontage does not appear that it will contain active uses as defined in Planning Code Section 145.1(b)(2). Please re-design the Halleck Street frontage so it is occupied by active uses. A Variance will be required if active ground floor uses are not proposed along Halleck Street. Please see further comments regarding the Halleck Street frontage in the Preliminary Design section of the letter.
- 7. Bicycle Parking. Per Planning Code Section 155.4, a total of 12 Class 1 bicycle parking spaces would need to be provided for the project. Additionally, four showers and eight clothes lockers would be required per Code Section 155.3. However, the plans indicate that no bicycle parking spaces or showers and lockers will be provided. Therefore, additional bicycle parking spaces and showers/lockers must be added, or a Variance would be required.
- Streetscape Improvements. Per Planning Code Section 138.1 and the Downtown Streetscape Plan, the Department may require standard streetscape elements and sidewalk widening for the appropriate street type per the Better Streets Plan, including street trees, landscaping, site furnishings, and/or corner curb extensions (bulb-outs) at intersections (see Better Streets Plan Section 4 for Standard Improvements and Section 5.3 for bulb-out guidelines: www.sfbetterstreets.org). The project sponsor is required to submit a Streetscape Plan illustrating these features, and the department will work with the project sponsor and other relevant departments to determine an appropriate streetscape design.
- 9. Ground-Level Wind Currents. As discussed under the "Environmental Review" section, the height of the proposed residential building would trigger a wind analysis study in order to identify changes in ground-level wind speeds resulting from project. Section 148 of the Planning Code comfort criteria (ground level wind levels not to exceed 11 mph in areas of substantial pedestrian use or 7 mph in public seating areas) specifically outlines these criteria for the Downtown Commercial (C-3) Districts, including the project site. The comfort criteria are based on pedestrian-level wind speeds that include the effects of turbulence; these are referred to as "equivalent wind speeds" (defined in the Planning Code as "an hourly mean wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians"). If existing wind speeds exceed the comfort level, or when a project would result in exceedances of the comfort criteria, an exception may be granted, pursuant to Planning Code Section 309, if the building or addition cannot be designed to meet the criteria "without creating an unattractive and ungainly building form and without unduly restricting the development potential" of the site, and it is concluded that the exceedance(s) of the criteria would be insubstantial "because of the limited amount by which the comfort level is exceeded, the limited location in which the comfort level is exceeded, or the limited time during which the comfort level is exceeded." Section 148 also establishes a hazard criterion, which is a 26 mph equivalent wind speed for a single full hour. Section 148 includes specific comfort- and hazard-level criteria for ground-level wind currents. If the project creates new exceedances of the comfort-level criteria, or if the project fails to fails to ameliorate

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- existing exceedances, an exception may be sought through the Section 309 review process. No exception may be sought, however, if the project creates new exceedances of the hazard-level criteria.
- 10. Loading. Per Planning Code Section 152.1, one off-street loading space will be required for the addition of the proposed office space. The plans indicated that existing loading space already exists in the basement garage area. Future submittals should clearly delineate the defined loading spaces and loading maneuvering found in the basement level.
- 11. Office Allocation. The proposed project would need to obtain an Office Allocation from the Planning Commission as outlined in Planning Code Sections 321 and 322.
- 12. Public Art. Per Section 429, the Project will be required to include works of art costing an amount equal to one percent of the construction cost of the building. The art will need to be installed in a location that is physically and/or visually accessible to the public. In certain circumstances, upon approval from relevant agencies, the art could be installed on public property (such as an adjacent right-of-way).
- 13. Transit Impact Development Fee. Pursuant to Planning Code Section 411, the Project Sponsor shall pay the Transit Impact Development Fee (TIDF) as required by and based on drawings submitted with the Building Permit Application. Prior to the issuance of a temporary certificate of occupancy, the Project Sponsor shall provide the Planning Director with certification that the fee has been paid.
- 14. Downtown Park Fee. Pursuant to Planning Code Section 412, the Project Sponsor shall pay the Downtown Park Fee. The fee shall be based on drawings of the net addition of gross floor area of office to be constructed as set forth in the building permit and shall be paid prior to the issuance of a temporary certificate of occupancy.
- 15. Jobs Housing Linkage. Pursuant to Planning Code Section 413, the Project Sponsor shall contribute to the Jobs-Housing Linkage Program. The calculation shall be based on the net addition of gross square feet of each type of space to be constructed as set forth in the permit plans. The Project Sponsor shall provide evidence that this requirement has been satisfied to the Planning Department prior to the issuance of the first site or building permit by the Department of Building Inspection.
- 16. Childcare Requirements for Office and Hotel Development Projects. Prior to issuance of a building or site permit for a development project subject to the requirements of Section 414.1 et seq., the sponsor shall elect one of the six options listed in Planning Code Section 414.4(c) to fulfill any childcare requirements imposed as a condition of approval and notify the Department of their choice. The net addition of gross floor area subject to the fee shall be determined based on drawings submitted with the Building Permit Application.
- 17. First Source Hiring. Chapter 83 of the San Francisco Administrative Code, passed in 1998, established the First Source Hiring Program to identify available entry-level jobs in San Francisco and match them with unemployed and underemployed job-seekers. The intent is to provide a resource for local employers seeking qualified, job ready applicants for vacant positions while helping economically disadvantaged residents who have successfully completed training programs and job-readiness classes.

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PLANNING DEPARTMENT 10 The ordinance applies to (1) any permit application for commercial development exceeding 25,000 square feet in floor area involving new construction, an addition or a substantial alteration which results in the addition of entry level positions for a commercial activity; or (2) any application which requires discretionary action by the Planning Commission relating to a commercial activity over 25,000 square feet, but not limited to conditional use; or (3) any permit application for a residential development of ten units or more involving new construction, an addition, a conversion or substantial rehabilitation.

The project is subject to the requirement. For further information or to receive a sample First Source Hiring Agreement, please see contact information below:

Ken Nim, Workforce Compliance Officer CityBuild, Office of Economic and Workforce Development City and County of San Francisco 50 Van Ness, San Francisco, CA 94102 Direct: 415.581.2303

Fax: 415.581.2368

PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Conditional Use Authorization, or Building Permit Application, as listed above, must be submitted no later than **January 6**, **2014**. Otherwise, this determination is considered expired and a new Preliminary Project Assessment is required. Such applications and plans must be generally consistent with those found in this Preliminary Project Assessment.

Enclosure: Shadow Fan Analysis

cc: Andrew Junius, Project Sponsor Aaron Hollister, Current Planning Paul Chasan, Long Range Planning David Winslow, Design Review Team